



County of San Diego

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DRAFT

CEQA Initial Study – Environmental Checklist Form (Based on the State CEQA Guidelines, Appendix G)

1. Project Name:

Sycuan-Sloane Canyon Trail

2. Lead agency name and address:

County of San Diego, Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, CA 92123-1239

3. a. Contact: Eira Whitty, Project Manager

b. Phone number: (858) 966-1377

c. E-mail: Eira.Whitty@sdcounty.ca.gov

4. Project location:

The Sycuan-Sloane Canyon Trail Project is located within the unincorporated community of Crest-Dehesa in eastern San Diego County (County), California (Figure 1, Regional Location). More specifically, the project is located roughly parallel to Dehesa Road and Sloane Canyon Road along the Sweetwater River (Figure 2, Project Vicinity [Aerial Photograph]). The project is located on land within County right-of-way (ROW), San Diego National Wildlife Refuge (SDNWR), and lands owned by the Sycuan Band of the Kumeyaay Nation (Sycuan) and Kumeyaay Diegueno Land Conservancy (KDLC).

5. Project Applicant name and address:

County of San Diego Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, CA 92123-1239

6. General Plan

Community Plan: Crest/Dehesa/Harbison Canyon/Granite Hills

Community Plan

Land Use Designation: Specific Plan Area, Tribal Lands, Public Agency Lands, Semi-Rural Residential (SR-4), and Rural Lands (RL-20)

Hills, Valle de Oro, Dulzura, and Jamul. The non-motorized recreational trail would provide increased opportunities for walking, bicycling, and equestrian use, as well as provide safe pedestrian and cyclist access to Dehesa Elementary School. The project is intended to increase and improve connectivity and mobility of non-motorized users within the community and throughout the region.

The topography of the Study Area includes relatively flat areas along Dehesa Road and Sloane Canyon Road, and some areas with steep slopes near the central portion of the project. Elevations along the trail alignment range from 430 feet above mean sea level along Dehesa Road to 1,030 feet along the ridge tops west of Sloane Canyon Road.

The proposed trail alignments would include pathways in County ROW and trails through Sycuan and KDLC land, and the SDNWR managed by the United States Fish and Wildlife Service (USFWS).

- Trail Segment 6a would be located entirely within County ROW.
- The western portion of Trail Segment 6b along the north side of Dehesa Road would be located within County ROW adjacent to land maintained by USFWS and private landowners.
- Trail Segment 1 is located on the south side of Dehesa Road in areas that were previously a large sand mine. Lake Emma, a 75-acre freshwater lake, is the product of these extraction activities.
- The majority of the proposed trail alignment (Trail Segments 1, 2, portions of Segments 3, 4, and 6a) in the northern portion of the Study Area surrounding Lake Emma is within the Sycuan Indian Reservation.
- The KDLC owns the land surrounding the proposed trail alignment (Trail Segment 5 and portions of Segments 3 and 4) in the southern portion of the project.
- The southernmost proposed trail alignment (Segment 5a and 5b) is located south of the Sweetwater River. Portions of Segment 5a is located within County ROW, and the entirety of Segment 5b is located on lands owned by the KDLC. Refer to Figure 3 and Figure 4, *Property Ownership*.

The proposed trail segments would be designed to follow the County's Preserve Trail Guidelines (County 2018), support the goals and policies outlined by the Community Trails Master Plan (County 2005), and would comply with the Multiple Species Conservation Plan (MSCP) Framework Management Plan. Approximate trail lengths and widths by segment are shown in Table 1, *Trail Dimensions*.

7. Zoning

Use Regulation: Specific Plan Area (S88), Limited Agricultural Use (A70), General Agricultural Use (A72), Open Space (S80), and Rural Residential (RR)
Minimum Lot Size: 1 acre
Special Area Regulation: F

8. Description of project:

The project proposes to implement the Sycuan-Sloane Canyon trail, which upon completion, would include six segments totaling approximately five miles. Implementation of the trail would provide a critical regional and community trail connection between the Sweetwater River Loop Trail and the California Riding and Hiking Trail.

The trail alignment is divided into segments, numbered as Segments 1 through 6. Segments 1 and 3 each have one option. Segment 2 is divided into three options, numbered as Segments 2a, 2b, and 2c. Segment 4 is also divided into three options, numbered as Segments 4a, 4b, and 4c. Segment 5 is divided into two options, numbered as Segments 5a and 5b. Segment 6 is divided into two options, numbered as Segments 6a and 6b. Segment 6b, if chosen as the preferred segment alignment, would replace Segment 6a and Segment 1.

The project's Study Area was chosen to incorporate all potential trail alignments. To the extent feasible, the County has designed the trail alignment options to use existing County right-of-way (ROW). Where it is not feasible to use existing County ROW, the County proposes using land outside the existing County ROW for trail use. The project would include securing trail easements per the 2015 Option Agreement between Sycuan and the County. Some non-preferred segment options would require securing easements from KDLC. Refer to Figure 3, *Sycuan-Sloane Trail Segments* for the trail alignment and trail segment locations.

The preferred alignment for this project would include the following segments: Segment 6a, Segment 1, Segment 2a, Segment 3, Segment 4a, and Segment 5a. In all cases, the preferred alignment is the one closest to, meandering in and out of, or completely within County ROW. This preferred alignment is intended to be built in phases. The first phase would construct Segment 1 and 2a. The second phase would construct Segment 4a and 5a along Sloane Canyon Road. The third phase would construct Segment 3, connecting with trails on the San Diego National Wildlife Refuge (SDNWR). The fourth phase would construct Segment 6a along Dehesa Road.

The proposed project supports the goals and policies outlined by the Community Trails Master Plan (County 2005) which includes objectives, policies, goals, implementation strategies, and guidelines for the management and expansion of the recreational trail network throughout the County. Implementation of the project would provide a critical regional and community trail connection between two regional trails, the Sweetwater River Loop Trail and the California Riding and Hiking Trail. This project is within the County's Crest/Dehesa/Granite Hills/Harbison Canyon planning area, which serves as a hub connecting the neighboring communities of El Cajon, Lakeside, Willow Glen/Singing

Table 1		
Trail Dimensions		
Segment	Width	Length
Segment 6a	5 feet	6,012 feet
Segment 6b	4 to 8 feet	13,067 feet
Segment 1	8 feet	6,662 feet
Segment 2a	5 feet	4,070 feet
Segment 2b	5 feet	4,058 feet
Segment 2c	4 to 8 feet	4,217 feet
Segment 3	4 to 5 feet	2,890 feet
Segment 4a	5 feet	2,152 feet
Segment 4b	5 feet	2,257 feet
Segment 4c	5 feet	2,363 feet
Segment 5a	5 to 8 feet	4,104 feet
Segment 5b	5 to 8 feet	4,117 feet

The project would post signage that would clearly prohibit trail users' access to areas outside of established trails and would clearly prohibit off-leash pets on trails or public areas. Following construction, only non-invasive, native plant species would be included in the landscape plan for the site (defined as species not listed on the California Invasive Plant Inventory prepared by the California Invasive Plant Council [2006]). Wildlife-friendly fencing would be installed to protect Quino checkerspot butterfly host plant areas.

The trail may utilize two bridges on Sloane Canyon Road: the existing Northern Bridge which crosses Harbison Canyon Creek and the existing Southern Bridge which crosses the Sweetwater River. The option to place trail infrastructure on each bridge would require narrower lanes for vehicular use. Safety features such as signage would be provided along the roadway before each bridge to warn drivers of narrowed lanes. A standalone bridge option for trail users may be constructed to separate pedestrian, bicycle, and equestrian users from vehicles on the existing Southern Bridge. A second standalone trail bridge is also proposed for Segment 5b along Sloane Canyon Road in the southeastern portion of the project. Vehicular use on the Segment 5b trail bridge would be prohibited, with access provided for trail users only.

To help avoid impacts to sensitive vegetation communities outside of the impact footprint during construction, temporary environmental fencing (including silt fencing, where determined necessary by the Stormwater Pollution Prevention Plan [SWPPP]), would be installed at the edges of the impact area prior to initiation of grading for each Segment.

Project construction activity would not be subject to the County Grading Ordinance per County Code 87.202, Subsection E. However, the project would be consistent with dust control measures adopted in the Grading Ordinance.

Segment 6a

Trail Segment 6a would be located in the western portion of the study area along the southern edge of Dehesa Road. The trail alignment would be located within County ROW,

prior to connecting to Segment 1 to the east. Segment 6a would provide regional connectivity by connecting the project to the Sweetwater Loop Trail. A portion of Segment 6a would be located on existing sidewalk along Dehesa Road. Segment 6a would be approximately 5 feet wide.

Segment 6b

Trail Segment 6b would be located in the western portion of the study area north of Dehesa Road prior to connecting with Segment 2 near the existing staging area. If this alignment is chosen, the trail would require a crossing at Dehesa Road near the intersection with Sloane Canyon Road. This intersection would require a full signalization with crosswalks for safe pedestrian movement in each direction. The trail would then be located within County ROW along the eastern edge of Sloane Canyon Road. The project would then cross Sloane Canyon Road at a non-signalized crossing of the roadway to meet the existing staging area and connect Segment 6b to Segment 2. Like Segment 6a, Segment 6b would provide regional connectivity by connecting the project to the Sweetwater Loop Trail. If the Segment 6b alignment is chosen, it would replace Segments 1 and 6a. Segment 6b would be between 4 and 8 feet wide.

Segment 1

Trail Segment 1 would be located along Dehesa Road east of the Singing Hills Golf Resort. This segment would travel through Sycuan land as a connection from the eastern end of Segment 6a to the northern end of Segment 2. The alignment would be located south of Dehesa Road and north of the Sweetwater River and Lake Emma. The project would incorporate two puncheon bridges to traverse existing jurisdictional drainages. The puncheon bridges would be located near the center of Segment 1, north of Lake Emma. The puncheon bridges would span the jurisdictional drainage, with abutments located outside the drainages. Segment 1 would be 8 feet wide.

Segment 2a

Trail Segment 2a would be located in the northern portion of the study area along Sloane Canyon Road. As shown on Figure 3, the segment would travel through County ROW and Sycuan land beginning at the existing staging area. Starting at the north, Segment 2a would be a 5-foot-wide trail located within County ROW along the eastern edge of Sloane Canyon Road. The trail would cross Harbison Canyon Creek using the existing Northern Bridge and would require physical separation from vehicular traffic. The trail would cross the Sweetwater River at or adjacent to the existing Southern Bridge. Crossing options include the trail's use of the existing Southern Bridge with physical separation from vehicular traffic, or through the construction of a new non-vehicular bridge parallel to the Southern Bridge. After crossing the Sweetwater River, the trail would require a crosswalk to the southern edge of Sloane Canyon Road.

Segment 2a would continue east along Sloane Canyon Road before ending at the intersection of Segments 2b, 3, 4a, and 4b. Operation of Segment 2a may require the use of safety features to separate the trail from vehicular use of the ROW.

Segment 2b

As shown on Figure 3, Segment 2b would be identical to Segment 2a from its beginning at the staging area off Sloane Canyon Road to a point east of the Southern Bridge along Sloane Canyon Road. At this point, Segment 2b would travel up a hillside to the west, ending at the intersection of Segments 2a, 3, 4a, and 4b. Operation of Segment 2b may require the use of safety features to separate the trail from vehicular use of the ROW. Segment 2b would be a 5-foot-wide trail.

Segment 2c

As shown on Figure 3, Segment 2c would be identical to Segments 2a and 2b from its beginning at the staging area off Sloane Canyon Road east of the Southern Bridge. At this point, Segment 2c would move out of County ROW to the south as a 4- to 8-foot-wide trail. The alignment would be located within an existing disturbed trail, traveling up a steep gradient to the southwest. Trail Segment 2c would end upon its convergence with Segment 3.

Segment 3

As shown on Figure 3, Segment 3 would begin at the intersection of Segments 2a, 2b, 4a, and 4b near Sloane Canyon Road. Segment 3 would be located in the eastern portion of the Study Area and would provide a connection to the SDNWR through Sycuan and KDLC lands. Segment 3 follows an existing dirt road used by vehicles for maintenance of the Refuge. The western end of Segment 3 would not connect to a project trail and would terminate at a point approximately 2,500 feet west of Sloane Canyon Road. Segment 3 would be a 4-to 5-foot-wide trail.

Segment 4a

As shown on Figure 3, Segment 4a would start at the intersection of Segments 2a, 2b, 3, and 4b near Sloane Canyon Road. Segment 4a would then travel eastward to County ROW. Segment 4a would then be located entirely within County ROW, traveling southward along Sloane Canyon Road to meet Segments 5a and 5b at the intersection of Model A Ford Lane and Sloane Canyon Road. Operation of Segment 4a would require the use of design features to separate the trail from vehicular use of the ROW. Segment 4a would be a 5-foot-wide trail.

Segment 4b

As shown in Figure 3, Segment 4b would start at the intersection of Segments 2a, 2b, 3, and 4b near Sloane Canyon Road. Segment 4b would then travel southward within Sycuan land, parallel to and west of Sloane Canyon Road. Segment 4b would then travel uphill to the west, before descending downhill to meet Segments 5a and 5b at the intersection of Model A Ford Lane and Sloane Canyon Road. Segment 4b would be located entirely outside County ROW within previously undisturbed areas. Segment 4b would be a 5-foot wide trail.

Segment 4c

As shown in Figure 3, Segment 4c would start at a location near the approximate midpoint of Segment 3. The alignment would connect Segment 3 to Segments 5a and 5b through Sycuan land and KDLC owned lands. The alignment would traverse a hillside before descending downhill to meet Segments 5a and 5b at the intersection of Model A Ford Lane and Sloane Canyon Road. Segment 4c would be located entirely outside of existing County ROW in previously undisturbed areas. Segment 4c would be a 5-foot wide trail.

Segment 5a

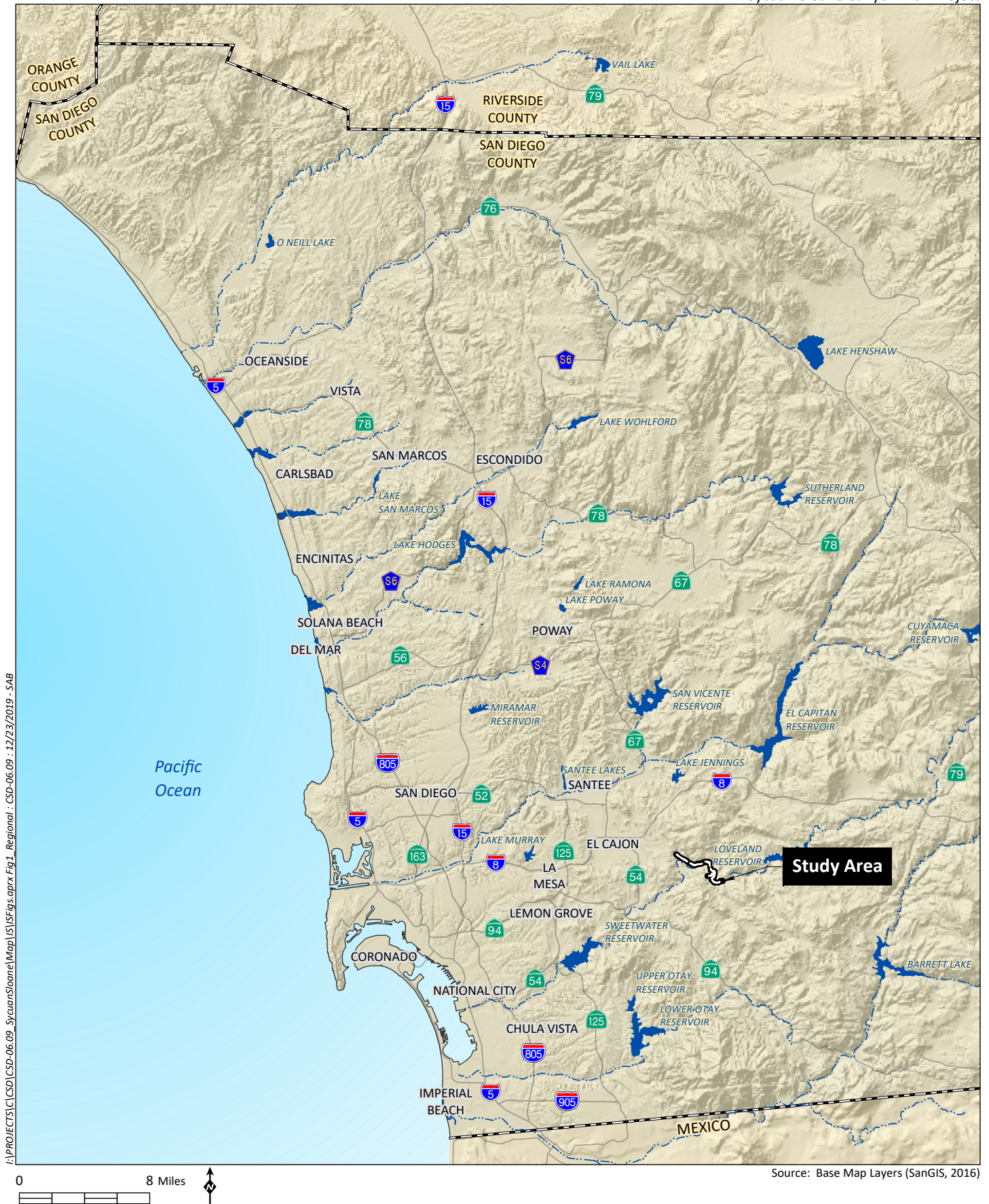
As shown in Figure 3, Segment 5a would be located in the southern portion of the Study Area along Sloane Canyon Road and travel from the intersection of Sloane Canyon Road and Model A Ford Lane to connect with the existing California Riding and Hiking Trail to the east. This segment would be located entirely within County ROW on the southern side of Sloane Canyon Road. No trail infrastructure would be constructed within the portions of roadway crossing a drainage called Beaver Hollow. Operation of Segment 5a would require the use of design features to separate the trail from vehicular use of the ROW. Segment 5a would be a 5- and 8-foot wide trail.

Segment 5b

As shown in Figure 3, Segment 5b is located in the southern portion of the Study Area along Sloane Canyon Road and travels from the intersection of Sloane Canyon Road and Model A Ford Lane to connect with the existing California Riding and Hiking Trail to the east. This segment would be located both within and outside County ROW on the southern edge of Sloane Canyon Road. Portions of the alignment for Segment 5b, however, would be located outside the existing County ROW on land owned and maintained by the KDLC. No trail infrastructure would be constructed within the portions of roadway crossing a drainage called Beaver Hollow. A non-vehicular bridge would be constructed along the eastern end of Segment 5b to separate trail users and vehicular traffic. This bridge would be required to retain the trail across steep terrain and a drainage. Segment 5b would be a 5- to 8-foot-wide trail.

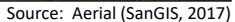
9. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Permit Type/Action	Agency
General Construction Storm Water Permit	Regional Water Quality Control Board
Landscape Plan/Revegetation Plan	County of San Diego
Right-of-Way Agreement	Department of Interior/ Bureau of Indian Affairs
No-rise Certification (for puncheon bridges along Segment 1 and the non-vehicular bridge for segment options 2a, 2b, and 2c)	San Diego County Flood Control
Section 7 Consultation for Segment 2c	United States Fish and Wildlife Services

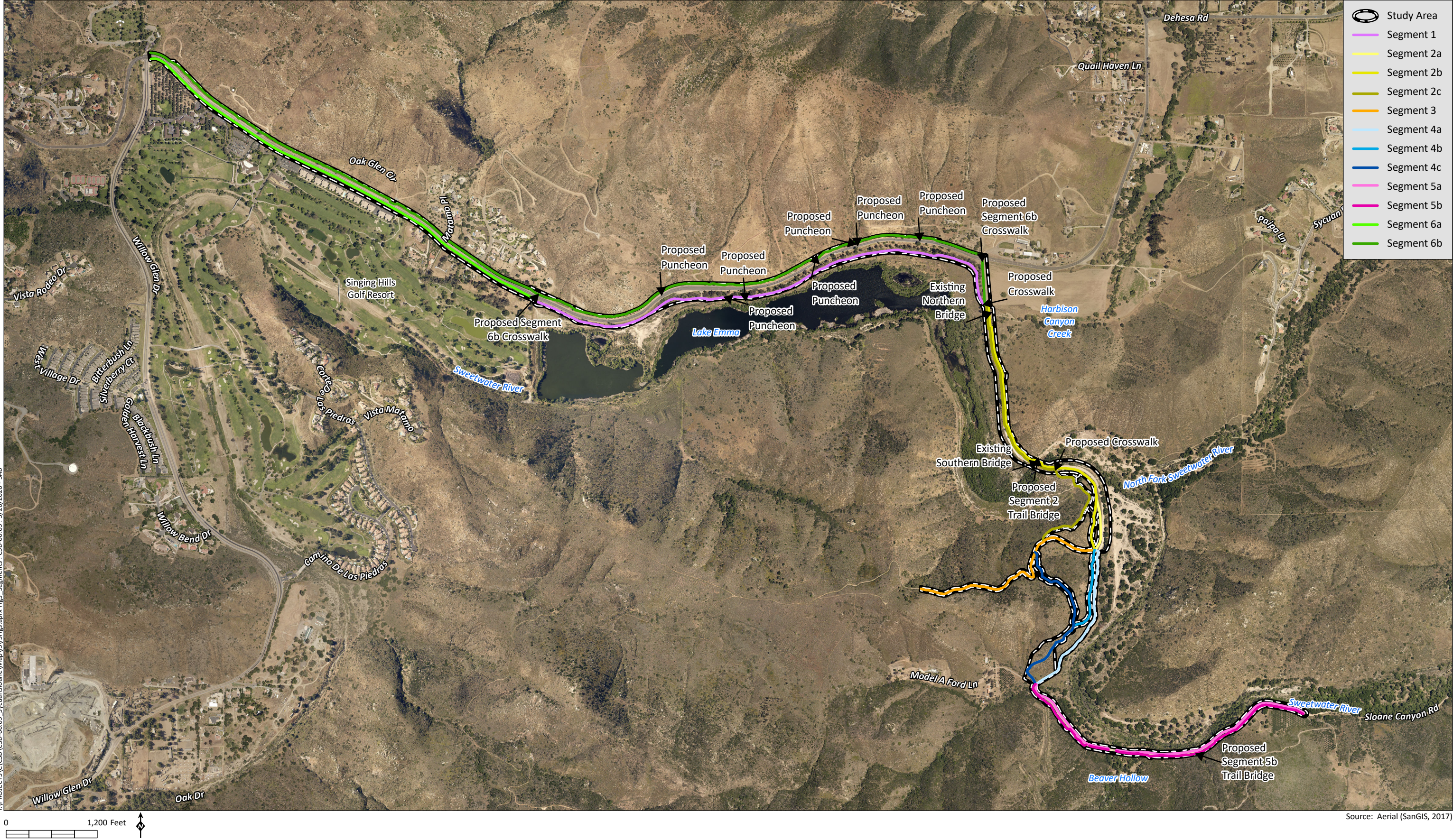


Regional Location

Figure 1

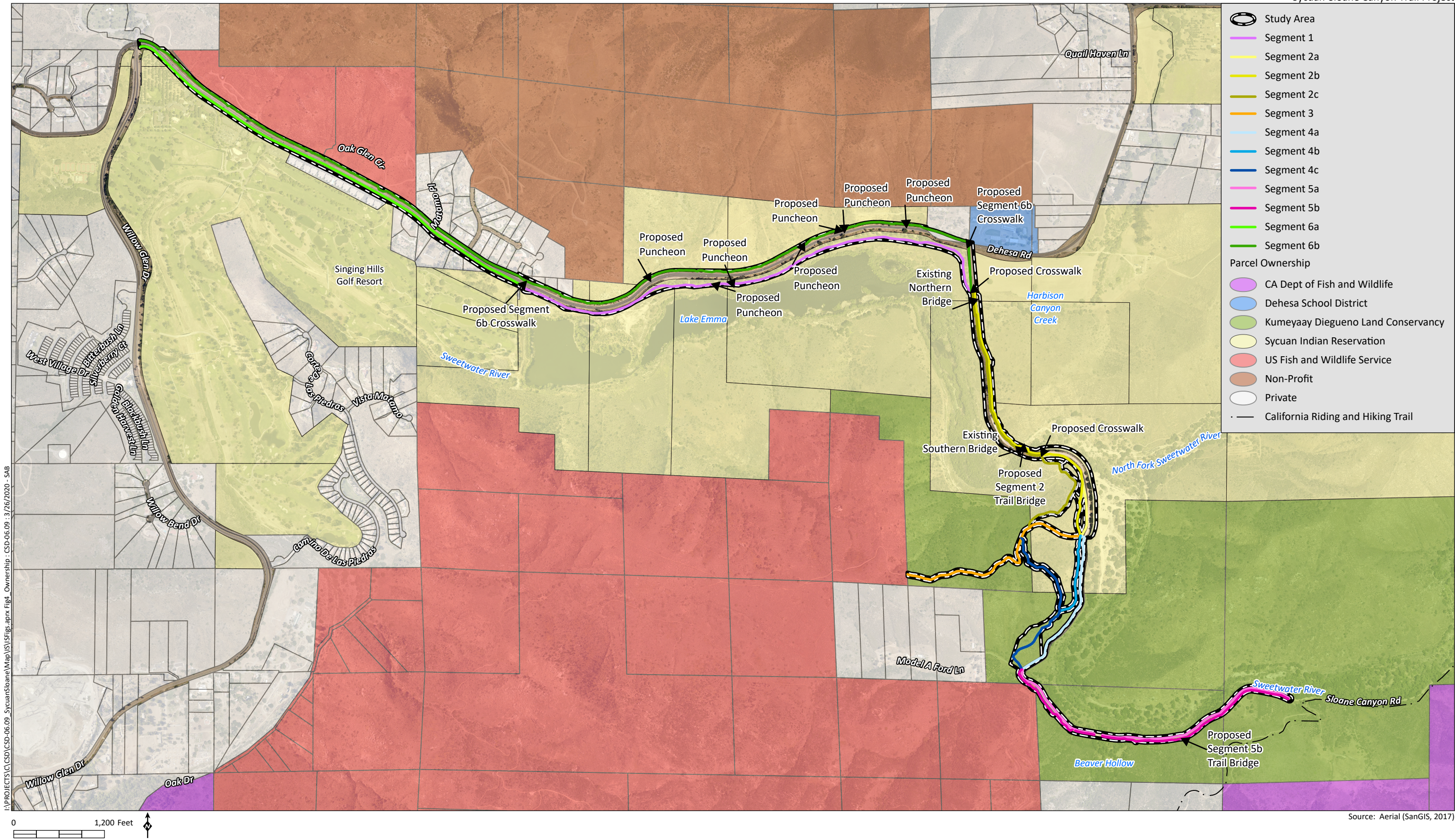


Project Vicinity (Aerial Photograph)



Sycuan-Sloane Canyon Trail Segments

Figure 3



Property Ownership

Figure 4

10. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, has consultation begun?

YES

☒

NO

☐

Note: Conducting consultation early in the California Environmental Quality Act (CEQA) process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts on tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21083.3.2). Information is also available from the Native American Heritage Commission's Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

AB-52 consultation with registered tribes was initiated between the County and each tribal contact on October 17, 2019 and the consultation request period ended November 16, 2019. These tribes included the Barona Band of Mission Indians, Campo Band of Mission Indians, Iipay Nation of Santa Ysabel, Jamul Indian Village, Kwaaymii Laguna Band, Manzanita Band of Kumeyaay Nation, Sycuan, and Viejas Band of Kumeyaay Indians. Three tribes (Sycuan, Iipay Nation of Santa Ysabel, and Viejas Band of Kumeyaay Indians) requested AB-52 consultation. While all tribes asserted that the area was culturally sensitive, no Tribal Cultural Resources within the Study Area were identified by any of the tribes. Iipay Nation of Santa Ysabel defers to Sycuan and concluded consultation on January 14, 2020. The Viejas Band of Kumeyaay Indians concluded consultation on January 15, 2020. Sycuan concluded consultation on February 5, 2020.

The project would not construct every trail segment option. The following Evaluation of Environmental Impacts addresses the entirety of the project, with the analysis encompassing the preferred alignment and each individual segment. The level of impact of individual combinations of trail segment options may provide variations in environmental effects and is analyzed in the Evaluation of Environmental Impacts.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a "Potentially Significant Impact" or a "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

☐ Aesthetics☐ Agriculture and Forest Resources☐ Air Quality☒ Biological Resources☒ Cultural Resources☐ Energy☐ Geology & Soils☐ Greenhouse Gas Emissions☐ Hazards & Hazardous Materials☐ Hydrology and Water Quality☐ Land Use & Planning☐ Mineral Resources

- | | | |
|--|---|--|
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population & Housing | <input type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ On the basis of this Initial Study, Department of Parks and Recreation finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ On the basis of this Initial Study, Department of Parks and Recreation finds 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.
- ☐ On the basis of this Initial Study, Department of Parks and Recreation finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Signature

Date

Printed Name

Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources 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 will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. “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.
4. “Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. 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. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state 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,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS. Except as provided in Public Resources Code Section 21009, would the project:

a) Have a substantial adverse effect on a scenic vista?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

A vista is a view from a particular location or composite views along a public roadway or trail. Scenic vistas often refer to views of natural lands but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

The features that can be seen within a vista are visual resources. Adverse impacts on individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact on a scenic vista requires both analyzing the changes to the vista as a whole and to individual visual resources.

Less Than Significant Impact. The proposed trail would be located generally along Dehesa Road and Sloane Canyon Road on lands within existing County ROW, or owned by the USFWS, Sycuan, or the KDLC. All segments of the trail alignment would be within view of a public roadway and would be within view of the future trail itself. Adverse effects on a scenic vista are described by segment below:

Segment 6a:

The visual composition of Segment 6a consists of residences, a golf course, and vegetated slopes along Dehesa Road. Segment 6a would be an approximately 5-foot-wide trail. Construction of Segment 6a would be largely located within the Dehesa Road ROW and would include existing sidewalks. Therefore, the trail would match the visual characteristics of the existing infrastructure and would not cause an adverse effect on a scenic vista.

Segment 6b:

The visual composition of Segment 6b consists of residences, a golf course, and vegetated slopes along Dehesa Road. Segment 6b would be an approximately 4 to 8-foot-wide trail parallel to Dehesa Road to the north. Graded slopes would be revegetated following construction, and the trail would match existing soils. Segment 6b would not have an adverse effect on scenic resources.

Segment 1:

The visual composition of Segment 1 consists of Lake Emma, vegetated slopes and ridges, and Dehesa Road. Construction of Segment 1 would require minor grading to create an approximately 8-foot-wide path. The path would be comprised of decomposed granite material, with some wooden fencing to keep trail users within the trail. The trail would also install two

puncheon bridges to cross drainages at the approximate midpoint of Segment 1. The trail would follow the existing topography and would utilize decomposed granite to mimic the existing soils. The puncheon bridges would be near ground level and would not visually obscure surrounding areas. Segment 1 would not have an adverse effect on scenic resources.

Segments 2a, 2b, and 2c:

The visual composition of Segments 2a, 2b, and 2c consists of Lake Emma, vegetated slopes and ridges, and Sloane Canyon Road along the Sweetwater River. Segments 2a and 2b would be located mostly within County ROW along the eastern portion of the Sloane Canyon Road and would be designed as a 5-foot-wide trail, with portions up to 8 feet wide as space allows. Segment 2c would have a width of 4 to 8 feet south of Sloane Canyon Road. A bridge may be required for non-vehicular trail use, but its design would be consistent with the existing area's rural community character. This bridge would be similar in length to the existing Southern Bridge to avoid impacts to jurisdictional waters and habitats and would be narrower to accommodate trail users. Some minor grading would be required with the potential use of retaining walls. Retaining walls would be designed to blend in with the existing topography and soil colors, and graded areas would be revegetated following construction. Safety features such as signage, striping, or physical barriers may be erected to separate trail users from vehicular traffic along Sloane Canyon Road. These safety features would be designed for visibility to vehicular traffic within the roadway but would not obstruct scenic vistas outside the County ROW. The trail would maintain the existing topography and would visually be similar to the profile and course of Sloane Canyon Road and existing trails; Segments 2a, 2b, and 2c would not have an adverse effect on scenic resources.

Segment 3:

The visual composition of Segment 3 is comprised of sloping vegetated hillsides and rocky outcroppings leading away from Sloane Canyon Road. Segment 3 would be a 4 to 5-foot-wide trail. Segment 3 would not require grading, and the majority of the trail alignment visible to nearby roadways already exists as an informal trail. Segment 3 would not have an adverse effect on scenic resources.

Segments 4a, 4b, and 4c:

The visual composition of Segment 4a is comprised of the unpaved roadway of Sloane Canyon Road. The visual composition of Segments 4b and 4c is comprised of sloping vegetated hillsides and rocky outcroppings above Sloane Canyon Road. Segment 4b and 4c would be 5 feet wide with retaining walls to accommodate the trail. For Segment 4a, signage, striping and physical barriers would be erected to separate trail users from vehicular traffic along Sloane Canyon Road. These safety features would be designed for visibility to vehicular traffic within the roadway but would not obstruct scenic vistas outside the County ROW. Retaining walls would be designed to blend in with the existing topography and soil colors. Graded slopes would be revegetated to match surrounding vegetation. Segments 4a, 4b, and 4c would not have an adverse effect on scenic resources.

Segments 5a and 5b:

The visual composition of Segments 5a and 5b is comprised of sloping vegetated hillsides, trees, and rocky outcroppings along Sloane Canyon Road. Segments 5a and 5b would be a 5-foot-wide trail, with portions up to 8 feet wide as space allows. Segment 5a would be designed to be within the Sloane Canyon Road ROW. Segment 5b would be designed to be parallel to and

within the roadway. For Segment 5b, the trail may require a bridge crossing over an existing drainage adjacent to Sloane Canyon Road. This new non-vehicular bridge would be visible from the roadway. This bridge would be smaller in scale than existing bridges along Sloane Canyon Road and would not impede any views from the roadway to nearby hillsides or the Sweetwater River. Safety features for visibility of trail users within the ROW to vehicular traffic would not obstruct scenic vistas. Segments 5a and 5c would not have an adverse effect on scenic resources.

All alignments of the proposed project would be designed to not interrupt or block a currently uninterrupted viewshed or prevent individuals from accessing a viewshed. The trail infrastructure would be designed in a way to minimize visual intrusions on the existing environment. Furthermore, the project would expand accessibility for the public to take advantage of viewsheds available in the area. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista.

The project would not result in cumulative impacts on a scenic vista based on an evaluation of the proposed project viewshed and past, present, and future projects within that viewshed to determine their cumulative effects. No cumulative projects were identified within the vicinity of the project. Refer to XXI, Mandatory Findings of Significance, for further discussion. Therefore, the project would not result in adverse project, or cumulative-level impacts on a scenic vista.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic ([Caltrans - California Scenic Highway Program](#)). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular ROW. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

No Impact: Scenic resources constitute the general visual appearance of a location or landscape, which is dependent on natural features such as geology, vegetation, landforms, and human developments. The proposed project is not near or visible within the composite viewshed of a State scenic highway and would not damage or remove visual resources within a State scenic highway. The nearest designated State scenic highway is a portion of State Route (SR-)125, which is located seven miles west of the project site. The nearest eligible State scenic highway, SR-94, is located approximately four miles south of the project site and would not be visible due to the intervening distance and topography.

The project would not result in cumulative impact to scenic resources within a State scenic highway as project is not visible within the composite viewshed of a State scenic highway and would not damage or remove visual resources within a State scenic highway. No cumulative projects were identified within the vicinity of the project. Refer to XXI, Mandatory Findings of Significance, for further discussion. Therefore, the project would not result in any adverse project or cumulative level effect on a scenic resource within a State scenic highway.

- c) In non-urbanized 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 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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: Visual character is the objective composition of the visible landscape within a viewshed. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity, and expectation of the viewers. The existing visual character and quality of the project site and its surroundings can be described as a rural landscape characterized by rocky ridges, vegetated slopes, and valleys. As described in I.a. the visual composition of Segments 1, 6a, and 6b consists of residences, a golf course, Lake Emma, and vegetated slopes and ridges along Dehesa Road. Further along the trail alignment, in Sloane Canyon, the visual character of Segments 2a, 2b, 2c, 3, 4a, 4b, 4c, 5a and 5b is distinctively rural with rocky outcroppings and vegetated slopes along the Sweetwater River and Sloane Canyon Road. Views of the proposed trails from publicly accessible areas include views from Dehesa Road and Sloane Canyon Road.

The proposed project would connect two existing trail networks to enhance regional trail connectivity. The project is compatible with the existing visual environment's visual character and quality because the proposed trails would be narrow and constructed of natural materials. All or portions of the Segments 2a, 2b, 2c, 4b, and 4c trail would be constructed outside the existing County ROW to avoid a hiker/vehicle safety hazard at a constrained curve on Sloane Canyon Road. This would require cuts into existing slopes. The project would require grading; however, graded areas would be revegetated, and retaining walls would match the existing soil. Furthermore, informal and formal trails are already located in the area, and the proposed trail would be consistent with the existing rural character. Therefore, the proposed project would not substantially degrade the existing visual character and/or visual quality of the site or in the surrounding area.

The project would not result in cumulative impacts on visual character or quality based on an evaluation of the existing viewshed. No cumulative projects were identified within the vicinity of the project. Refer to XXI, Mandatory Findings of Significance, for further discussion. Therefore, the project would not result in any adverse project- or cumulative-level effect on visual character or quality on site or in the surrounding area.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant with Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The majority of trail use would be during daytime hours and no lighting of the trail paths is proposed and the project does not propose the use of materials with highly reflective properties such as highly reflective glass or high-gloss surface colors. Therefore, the project would not create a substantial source of light pollution that could adversely affect day or nighttime views in area.

If Segment 6b is chosen as the preferred alternative, a traffic signal and crosswalk would be installed at the intersection of Dehesa Road and Sloane Canyon Road or at a point approximately 800 feet east of the intersection of Dehesa Road and Sycuan Summit Drive. However, the project is not located within Dark Sky Zone A as designated by the Light Pollution Code. Furthermore, traffic lighting would be shielded to localize the light to the intersection and roadways. The project would not contribute to significant cumulative impacts on day or nighttime views. Therefore, compliance with the Code ensures that the project would not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level.

II. AGRICULTURE AND FORESTRY RESOURCES -- Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: Segments 1, 2a, 2b, 2c, 3, 4a, 4b, and 4c are located within land designated as Farmland of Local Importance according to the State Farmland Mapping and Monitoring Program (FMMP). The Study Area is not currently used for agricultural cultivation, and the proposed project would not prohibit future agricultural production through rezoning or formal changes in land use. Therefore, no potentially significant project- or cumulative-level conversion of agricultural resources to a non-agricultural use would result from project implementation.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed trail alignment traverses several zoning designations, including Rural Residential (RR), General Agricultural Use (A72), and Limited Agricultural Use (A70) which is considered an agricultural zone. However, the project would not result in an agricultural zoning conflict because it would be an allowed use and would not impact agricultural uses on or adjacent to the project site. No agricultural cultivation presently occurs in the area. The proposed project would not prevent the area from being used for agricultural cultivation in the future. Additionally, the project site's land is not under a Williamson Act Contract. Therefore, there would be no conflict with, or cumulatively significant impact on, existing zoning for agricultural use, or a Williamson Act contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site does not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project would be consistent with existing zoning, and a rezone of the property is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production zones; or result in a cumulatively significant impact related to existing zoning of timberland.

d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site does not contain any forest lands as defined in Public Resources Code Section 12220(g); therefore, project implementation would not result in the loss or

conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of off-site forest resources. Therefore, project implementation would not result in the disturbance, loss, or conversion of forest resources to a non-forest use.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: No agricultural uses exist on the project site. The proposed project would establish approximately 5 miles of new trails, which would not limit or prevent the project site from being used for agricultural operations in the future. As a result, the proposed project would not have a significant adverse impact or cumulative impact related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, or active agricultural operations to a non-agricultural use.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project proposes development that was anticipated in the San Diego Association of Governments' (SANDAG's) growth projections used in development of the RAQS and SIP. As such, the proposed project is not expected to conflict with either the RAQS or the SIP. Emissions associated with the project would primarily result from construction activities. Mechanized equipment, such as a dozer, loader, backhoe, and excavator would be used to construct the trails. Hand tools would also be used to construct the trail alignment, especially in areas inaccessible to larger equipment. Existing roads and trails would be used to access the site. Once constructed, operational emissions are not anticipated to exceed existing conditions because the project would be a non-motorized trail that would connect two existing non-motorized regional trails in support of pedestrians, bicyclists, and equestrians. Even if six segments were constructed simultaneously, total project emissions would not exceed any threshold for ambient air quality standards (HELIX 2020a; Appendix A). Because the proposed project would not violate ambient air quality standards, it would also not result in a cumulatively

considerable impacts on ambient air quality standards when combined with the cumulative projects listed in XVIII. Mandatory Findings of Significance, below.

- 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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

San Diego County is presently in non-attainment for the 1-hour concentrations under the California Ambient Air Quality Standard (CAAQS) for Ozone (O₃). San Diego County is also presently in non-attainment for both the particulate matter less than or equal to 10 microns (PM₁₀) and Particulate Matter less than or equal to 2.5 microns (PM_{2.5}) under the CAAQS. O₃ is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing and storage, and pesticides. Sources of PM₁₀ in both urban and rural areas include motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Less Than Significant Impact: Air quality emissions associated with the project include emissions of PM₁₀, PM_{2.5}, NO_x, SO_x, CO, and VOCs from construction/grading activities. Although the project would not be subject to the County Grading Ordinance, the project would be consistent with dust control measures to reduce potential fugitive dust emissions during construction. Emissions from the construction phase would be minimal and localized, resulting in emissions below the screening-level criteria established by the San Diego Land Use Environment Group (LUEG) guidelines for determining significance. Because the proposed project is a trail that would support pedestrians, bicyclists, and equestrians by connecting two existing regional trails, it would not increase long-term air pollutants in the vicinity of the project. Therefore, operational emissions are not anticipated to exceed existing conditions.

No cumulative projects were identified within the vicinity of the project. Refer to XXI, Mandatory Findings of Significance, for further discussion. Therefore, the construction and operational emissions associated with the proposed project would not create a cumulatively considerable impact nor a considerable net increase of PM₁₀, PM_{2.5}, NO_x, SO_x, CO, or VOCs.

- c) Expose sensitive receptors to substantial pollutant concentrations?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

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.

Less Than Significant Impact: Dehesa Elementary School is located north of Dehesa Road near the intersection of Dehesa Road and Sloane Canyon Road. Segments 1, 2a, 2b, 2c, and 6b would be located within one-quarter mile of Dehesa Elementary School. However, the project does not propose uses or activities that would result in exposure of sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near carbon monoxide hotspots. The project would be consistent with dust control measures identified in the County's Grading Ordinance. During site preparation and grading construction phases, all soil excavated or graded would be sufficiently watered to prevent excessive dust. Watering would occur as needed with complete coverage of disturbed soil areas. Watering would occur a minimum of twice daily on unpaved roads and on disturbed soil areas with active operations. All haul trucks transporting soil to or from the project site would be covered to prevent fugitive dust emissions, and traffic speeds on all unpaved portions of the project site would be reduced to 15 miles per hour or less. In addition, the project would not contribute to a cumulatively considerable exposure of sensitive receptors to substantial pollutant concentrations because no cumulative projects were identified within the vicinity of the project. Refer to XXI, Mandatory Findings of Significance, for further discussion.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project could result in emissions during construction that produce objectionable odors, such as exhaust from construction equipment. However, such odors would be a temporary source of nuisance that would not affect a substantial number of people and would be limited to areas closed during construction activities. Moreover, the effects of objectionable odors are localized to the immediate surrounding area and would not contribute to a cumulatively considerable odor. No cumulative projects were identified within the vicinity of the project. Refer to XXI, Mandatory Findings of Significance, for further discussion. As such, impacts as a result of odors generated by the proposed project would be less than significant.

IV. BIOLOGICAL RESOURCES -- Would the project:

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: A Biological Resources Technical Report (BRTR) was prepared for the proposed project (HELIX 2020b; Appendix B). The BRTR includes a comprehensive review of the biological resources present and potentially present at the project site, determined by several surveys completed in 2019. Although the project is exempt from the Biological Mitigation Ordinance (BMO), the trail segments, including the preferred alignment, have been designed to avoid impacts to sensitive species, consistent with the BMO, as feasible.

According to the BRTR, the proposed project would result in impacts to sensitive species and their habitats. Seven special status plant species were confirmed as occurring within the Study Area during rare plant surveys: San Diego sagewort, Dean's milk-vetch, San Diego sunflower, delicate clarkia, small-flowered morning-glory, Dehesa beargrass, and ashy spike-moss. The project would avoid impacts to San Diego sagewort. The project would impact relatively low numbers of San Diego sunflower, small-flowered morning glory, and ashy spike-moss. These impacts are considered less than significant because these species occur within similar habitat adjacent to the Study Area and are widespread throughout the South County MSCP Subarea. The project has the potential to impact Dean's milk-vetch, delicate clarkia, and Dehesa beargrass. These impacts are considered significant and would require mitigation.

A total of 24 special status animal species were detected in or within 500 feet of the Study Area during 2019 surveys: Cooper's hawk, sharp-shinned hawk, red-shouldered hawk, Costa's hummingbird, turkey vulture, Southern California rufous-crowned sparrow, Caspian tern, yellow-breasted chat, Lewis' woodpecker, American white pelican, yellow warbler, Lawrence's goldfinch, coastal California gnatcatcher, least Bell's vireo, arroyo toad, Belding's orange-throated whiptail, San Diego tiger (Coastal) whiptail, two-striped garter snake, Blainville's [Coast] horned lizard, monarch butterfly, Quino checkerspot butterfly (Quino), Hermes Copper butterfly, mule deer, mountain lion, and oak titmouse. . Of these species, the project has the potential to impact arroyo toad, coastal California gnatcatcher, least Bell's vireo, Quino checkerspot butterfly (Quino), Hermes Copper butterfly.

The project would implement avoidance measures for required arroyo toad, Hermes Copper butterfly, Quino, least Bell's vireo, and coastal California gnatcatcher including compensation for the potential loss of arroyo toad critical habitat and coastal California gnatcatcher critical habitat, through on- or off-site revegetation or purchase of mitigation credits. Potential impacts and associated mitigation measures required per trail segment are detailed below.

Segment 6a: Segment 6a would potentially result in impacts to coastal California gnatcatcher. Construction noise would be significant for any areas impacted by noise exceeding 60 A weighted decibels (dBA) L_{EQ} . If coastal California gnatcatcher or tree nesting raptors are nesting within 300 feet of the impact area (500 feet for raptors), effects resulting from construction noise would be significant. These impacts would be less than significant with implementation of mitigation measure **MM-BIO-1**.

Segment 6b: Segment 6b could impact four federally or state listed species within the Study Area: arroyo toad, least Bell's vireo, coastal California gnatcatcher, and Dehesa beargrass. Arroyo toads could move into the work area in the eastern portion of Segment 6b during trail construction; impacts would be considered significant if arroyo toads were to be harmed. To prevent toads from moving into the work area during trail construction, mitigation measure **MM-BIO-2** would require temporary fencing to be installed during construction. Impacts to Diegan coastal sage scrub occupied by coastal California gnatcatcher would be mitigated through implementation of **MM-BIO-3**. Project construction noise could impact the nesting success of coastal California gnatcatcher and least Bell's vireo. Construction noise would be significant for any areas impacted by noise exceeding 60 dBA L_{EQ} . If coastal California gnatcatcher or tree-nesting raptors are nesting within 300 feet of the impact area, effects resulting from construction noise would be significant. These impacts will be mitigated through implementation of mitigation measure **MM-BIO-1**. Dehesa beargrass was observed at two locations. Segment 6a would impact Dehesa beargrass locations, which would be a significant impact. Mitigation measures **MM-BIO-4** and **MM-BIO-5** would reduce impacts to less than significant levels. Segment 6b would also impact potential habitat for Hermes copper butterfly. Impacts to potential Hermes copper butterfly habitat would be less than significant with implementation of mitigation measure **MM-BIO-6**.

Segment 1: Segment 1 could impact three federally or state listed species within the Study Area: arroyo toad, least Bell's vireo, and coastal California gnatcatcher. Arroyo toads could move into the work area in the eastern portion of Segment 1 during trail construction; impacts would be considered significant if the toads are harmed. To prevent arroyo toad from moving into the work area during trail construction, mitigation measure **MM-BIO-2** would require temporary fencing to be installed during construction. The project would avoid direct impacts to riparian habitat occupied by least Bell's vireo. Indirect impacts related to construction noise to nesting least Bell's vireos within 300 feet of construction areas would be significant if nesting success was adversely affected. Impacts to least Bell's vireo would be less than significant with implementation of mitigation measure **MM-BIO-7**. Project construction noise could impact the nesting success of coastal California gnatcatcher, least Bell's vireo, and tree-nesting raptors. Construction noise would be significant for any areas impacted by noise exceeding 60 dBA. If coastal California gnatcatcher, least Bell's vireo, or tree nesting raptors are nesting within 300 feet of the impact area (500 feet for raptors), effects resulting from construction noise would be significant. These impacts would be less than significant with implementation of mitigation measure **MM-BIO-1**.

Segment 2a: Segment 2a could impact four federally or state listed species within the Study Area: arroyo toad, least Bell's vireo, coastal California gnatcatcher, and Hermes copper butterfly. Arroyo toads could move into the work area during trail construction; impacts would be considered significant if the toads are harmed. To prevent arroyo toad from moving into the work area during trail construction, mitigation measure **MM-BIO-2** would require fencing to be installed and inspected by a biological monitor. The alignments for Segment 2a would avoid direct impacts

to riparian habitat occupied by least Bell's vireo. Indirect impacts related to construction noise to nesting least Bell's vireos within 300 feet of construction areas would be significant if nesting success was adversely affected. Construction noise impacts to nesting least bell's vireo will be mitigated through implementation of mitigation measure **MM-BIO-1**. Segment 2a would also impact potential habitat for Hermes copper butterfly. Hermes copper butterfly impacts would be less than significant with implementation of mitigation measure **MM-BIO-8**. Project construction noise could impact the nesting success of coastal California gnatcatcher, least Bell's vireo, and tree-nesting raptors. Construction noise would be significant for any areas impacted by noise exceeding 60 dBA. If coastal California gnatcatcher, least Bell's vireo, or tree nesting raptors are nesting within 300 feet of the impact area (500 feet for raptors), effects resulting from construction noise would be significant. These impacts would be less than significant with implementation of mitigation measure **MM-BIO-1**.

Segment 2b: Segment 2b could impact four federally or state listed species within the Study Area: arroyo toad, least Bell's vireo, coastal California gnatcatcher, and Hermes copper butterfly. Arroyo toads could move into the work area during trail construction; impacts would be considered significant if the toads are harmed. To prevent arroyo toad from moving into the work area during trail construction, mitigation measure **MM-BIO-2** would require fencing to be installed and inspected by a biological monitor. The alignment for Segment 2b would avoid direct impacts to riparian habitat occupied by least Bell's vireo. Indirect impacts related to construction noise to nesting least Bell's vireos within 300 feet of construction areas would be significant if nesting success was adversely affected. Construction noise impacts to nesting least bell's vireo will be mitigated through implementation of mitigation measure **MM-BIO-1**. Segment 2b would also impact potential habitat for Hermes copper butterfly. Hermes copper butterfly impacts would be less than significant with implementation of mitigation measure **MM-BIO-8**. Project construction noise could impact the nesting success of coastal California gnatcatcher, least Bell's vireo, and tree-nesting raptors. Construction noise would be significant for any areas impacted by noise exceeding 60 dBA. If coastal California gnatcatcher, least Bell's vireo, or tree nesting raptors are nesting within 300 feet of the impact area (500 feet for raptors), effects resulting from construction noise would be significant. These impacts would be less than significant with implementation of mitigation measure **MM-BIO-1**.

Segment 2c: Segment 2c could impact five federally or state listed species within the Study Area: arroyo toad, least Bell's vireo, coastal California gnatcatcher, Quino, and Hermes copper butterfly. Arroyo toads could move into the work area during trail construction; impacts would be considered significant if arroyo toads were to be harmed. To prevent arroyo toad from moving into the work area during trail construction, mitigation measure **MM- BIO-2** would require fencing to be installed and inspected by a biological monitor. The alignments for Segment 2c would avoid direct impacts to riparian habitat occupied by least Bell's vireo. Indirect impacts related to construction noise to nesting least Bell's vireos within 300 feet of construction areas would be significant if nesting success was adversely affected. Construction noise impacts to nesting least bell's vireo will be mitigated through implementation of mitigation measure **MM-BIO-1**. Segment 2c would also impact potential habitat for Hermes copper butterfly. Hermes copper butterfly impacts would be less than significant with implementation of mitigation measure **MM-BIO-8**. Project construction noise could impact the nesting success of coastal California gnatcatcher, least Bell's vireo, and tree-nesting raptors. Construction noise would be significant for any areas impacted by noise exceeding 60 dBA. If coastal California gnatcatcher, least Bell's vireo, or tree nesting raptors are nesting within 300 feet of the impact area (500 feet for raptors), effects

resulting from construction noise would be significant. These impacts would be less than significant with implementation of mitigation measure **MM-BIO-1**. Host plants for Quino occur along the trail alignment and impacts to host plant patches would be considered significant. Impacts to Quino host plants will be avoided or mitigated by Mitigation measure **MM-BIO-9**.

Segment 3: Segment 3 could impact two federally or state listed species within the Study Area: coastal California gnatcatcher and Hermes copper butterfly. Construction noise would be significant for any breeding habitat and areas impacted by noise exceeding 60 dBA. If tree nesting raptors are nesting within 300 feet of the impact area (500 feet for raptors), effects resulting from construction noise would be significant. These impacts would be less than significant with implementation of mitigation measure **MM-BIO-1**. Furthermore, construction within this segment would impact 0.02 acre of Diegan coastal sage scrub occupied by coastal California gnatcatcher. These impacts will be mitigated through implementation of mitigation measure **MM-BIO-11**. Segment 3 would also impact potential habitat for Hermes copper butterfly. Hermes copper butterfly impacts would be less than significant with implementation of mitigation measure **MM-BIO-12**.

Segment 4a: Segment 4a could impact two federally or state listed species within the Study Area: arroyo toad and coastal California gnatcatcher. Segment 4a would be located within arroyo toad critical habitat, but the area to be impacted is entirely paved road surface. Segment 4a would be routed along the paved road to minimize impacts. Arroyo toads could move into the work area during trail construction; impacts would be considered significant if arroyo toads were to be harmed. To prevent arroyo toad from moving into the work area during trail construction, mitigation measure **MM-BIO-2** would require fencing to be installed and inspected by a biological monitor. Project construction noise could impact the nesting success of coastal California gnatcatcher and tree-nesting raptors. Construction noise would be significant for any areas impacted by noise exceeding 60 dBA. If coastal California gnatcatcher or tree nesting raptors are nesting within 300 feet of the impact area (500 feet for raptors), effects resulting from construction noise would be significant. These impacts would be less than significant with implementation of mitigation measure **MM-BIO-1**.

Segment 4b: Segment 4b could impact two federally or state listed species within the Study Area: arroyo toad and coastal California gnatcatcher. Arroyo toads could move into the work area during trail construction; impacts would be considered significant if arroyo toads were to be harmed. To prevent arroyo toad from moving into the work area during trail construction, mitigation measure **MM-BIO-2** would require fencing to be installed and inspected by a biological monitor. Project construction noise could impact the nesting success of coastal California gnatcatcher and tree-nesting raptors. Construction noise would be significant for any areas impacted by noise exceeding 60 dBA. If coastal California gnatcatcher or tree nesting raptors are nesting within 300 feet of the impact area (500 feet for raptors), effects resulting from construction noise would be significant. These impacts would be less than significant with implementation of mitigation measure **MM-BIO-16**.

Segment 4c: Segment 4c could impact two federally or state listed species within the Study Area: coastal California gnatcatcher and Hermes copper butterfly. Project construction noise could impact the nesting success of coastal California gnatcatcher and tree-nesting raptors. Construction noise would be significant for any areas impacted by noise exceeding 60 dBA. If coastal California gnatcatcher or tree nesting raptors are nesting within 300 feet of the impact

area (500 feet for raptors), effects resulting from construction noise would be significant. These impacts would be less than significant with implementation of mitigation measure **MM-BIO-1**. Segment 4c would impact 0.05 acre of potential Hermes copper butterfly habitat. This would be mitigated by mitigation measure **MM-BIO-13**. Segment 4c would also potentially impact delicate clarkia and Dean's milk-vetch individuals during construction. If found within the Segment 4c alignment, impacts would be potentially significant. The alignment would be designed to minimize impacts to these species and impacts to these two species would be further mitigated by mitigation measure **MM-BIO-14** and **MM-BIO-15**.

Segment 5a: Segment 5a would be located entirely within the ROW of the existing Sloane Canyon Road. Construction would involve striping and the placement of signage and barriers to separate trail users from vehicles. Biological impacts from Segment 5a would be less than significant.

Segment 5b: Segment 5b could impact three federally or state listed species within the Study Area: arroyo toad, coastal California gnatcatcher, and Hermes copper butterfly. Arroyo toads could move into the work area during trail construction; impacts would be considered significant if arroyo toads were to be harmed. Impacts to arroyo toad will be mitigated by mitigation measure **MM-BIO-2**. Segment 5b would also impact potential habitat for Hermes copper butterfly. This would be mitigated by mitigation measure **MM-BIO-16**. Project construction noise could impact the nesting success of coastal California gnatcatcher and tree-nesting raptors. Construction noise would be significant for any areas impacted by noise exceeding 60 dBA. If coastal California gnatcatcher or tree-nesting raptors are nesting within 300 feet of the impact area (500 feet for raptors), effects resulting from construction noise would be significant. These impacts would be less than significant with implementation of mitigation measure **MM-BIO-22**.

With implementation of the proposed mitigation measures, the proposed project would result in minimal impacts to sensitive species and their habitats. The proposed project would not contribute to a significant cumulative impact on arroyo toad, coastal California gnatcatcher, Quino, or least Bell's vireo with implementation of the proposed mitigation measures. The individual project segments will be designed to the extent feasible to avoid Quino habitat impacts, and the project will avoid riparian habitat occupied by least Bell's vireo. Construction of individual segments may impact sensitive species habitats; however, the project would implement arroyo toad, least Bell's vireo, and gnatcatcher avoidance measures, and compensate for the loss of habitat for arroyo toad, coastal California gnatcatcher, and Hermes copper butterfly through on- or off-site revegetation or purchase of mitigation credits from a mitigation bank pursuant to the MSCP.

Cumulative impacts would be considered less than significant since the proposed project would be in conformance with the South County MSCP Subarea Plan and other projects proposed in the region would have to comply with the County MSCP program and the South County MSCP Subarea Plan.

To reduce impacts to sensitive species from the project alignment segments, including the preferred alignment, the following mitigation measures would be required:

MM-BIO-1 Grubbing or clearing of vegetation for trail Segment 6a, 6b, 1, 2a, 2b, 2c, 3, 4a, 4b, 4c, and 5b during the general avian breeding season (February 1 – September

15), least Bell's vireo breeding season (March 15 to September 15), coastal California gnatcatcher breeding season (March 1 – August 15), or raptor breeding season (January 15 – July 15) shall be avoided to the extent feasible. If grubbing, clearing, or grading would occur during the breeding season, a pre-construction survey shall be conducted by a qualified biologist no more than three days prior to the commencement of activities to determine if active bird nests are present in the affected areas. If there are no nesting birds (includes nest building or other breeding/nesting behavior) within 300 feet of the survey area (500 feet for raptors), clearing, grubbing, and grading shall be allowed to proceed in that area. Furthermore, if construction activities are to resume in an area where they have not occurred for a period of seven or more days during the breeding season, an updated survey for avian nesting will be conducted by a qualified biologist within three days prior to the commencement of construction activities in that area. If active nests or nesting birds are observed within 300 feet of the survey area (500 feet for raptors), the biologist shall flag a buffer around the active nests and construction activities shall not occur within 300 feet of active nests (500 feet for raptors) until nesting behavior has ceased, nests have failed, or young have fledged as determined by a qualified biologist. If the qualified biologist determines that the species will not be impacted with a reduced buffer (i.e., less than 300 feet for general avian species and 500 feet for raptors), potentially with implementation of avoidance measures to reduce noise, as necessary, and the qualified biologist monitors the active nest during construction to ensure no impacts to the species occur, construction may occur outside the reduced buffer during the breeding season, as long as the species is not impacted.

MM-BIO-2 The following arroyo toad conservation measures apply in the area of Segment 6b shown as Arroyo Toad Exclusion Area on Figure 14c of this project's BRTR, the area of Segment 1 shown as Arroyo Toad Exclusion Area on Figure 14c of this project's BRTR, the area of Segment 2a, 2b, or 2c, as applicable, shown as Arroyo Toad Exclusion Area on Figure 14d of this project's BRTR, the area of Segment 4a and 4b shown as Arroyo Toad Exclusion Area on Figure 14f of the BRTR, and the area of Segment 5b shown as Arroyo Toad Exclusion Area on Figure 14g of this project's BRTR. There will be no soil-disturbing activity during arroyo toad breeding season outside the arroyo toad exclusion fence (March 15 through July 1). To avoid potential impacts to arroyo toads that may be aestivating within the project area, exclusionary arroyo toad fencing will be installed around the limits of work during trail construction. The fence will consist of fabric or plastic at least 2 feet high. The lower 1 foot of the fence will be laid across the ground, staked firmly, and held securely by a continuous line of gravel bags, such that there are no gaps that could allow passage for arroyo toad. No vegetation removal or soil disturbance will be associated with installation of the fence, except for minor soil disturbance installing the stakes to hold up the fence, and all materials will be removed when earthwork is complete. Fence installation will be monitored by a USFWS-approved biologist. Following fence installation, a USFWS-approved biologist will conduct clearance surveys within the fenced areas for a minimum of three consecutive nights. If pre-activity conditions are dry, the area inside the exclusionary fencing will be sprayed with water during the arroyo toad survey to simulate a precipitation event. Surveys must be completed no more than 5 days prior to initiating soil-disturbing activities. Any arroyo toads found during surveys will be relocated safely by the approved biologist to outside of the fenced area. The approved biologist will continue surveys until there have been two consecutive nights without arroyo toads inside the fence. The USFWS-approved biologist

will conduct a training for construction personnel prior to impacts and shall be on-site at least weekly to check fencing integrity. No work will occur immediately prior to or during rain events.

MM-BIO-3 Mitigation for Segment 6b permanent impacts to 1.67 acres of coastal California gnatcatcher occupied Diegan coastal sage scrub, a Tier II habitat, including 0.93 acre of critical habitat, shall occur at a 1.5:1 ratio with 2.51 acres of Tier II or Tier I habitat in the South County MSCP area, within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-4 Prior to trail grading for Segment 6b, follow-up rare plant surveys shall be conducted by a County-approved biologist for Dehesa beargrass (*Nolina interrata*), which was observed in the Segment 6b Study Area and would require additional measures for unavoidable impacts.

Should Dehesa beargrass be identified in the proposed impact area, the project alignment shall be adjusted to avoid them to the maximum extent practicable, consistent with the BMO Section 86.507.a.1. If impacts are unavoidable, they shall be quantified and limited to no more than 20 percent of the total population in the area, consistent with the BMO Section 86.507.a.1, as determined during pre-construction surveys and documented in a letter report submitted by the County-approved biologist to DPR and BIA. The mapping of plant populations will extend beyond the impact area into the adjacent area that meets the species' habitat requirements, as determined by the County-approved biologist. Impacts shall be mitigated consistent with the BMO Section 86.507.a.1 at a 3:1 ratio.

Mitigation will consist of on- or off-site preservation, translocation, and/or restoration, with a preference for species salvage and transplantation on site if feasible. DPR and BIA will review and approve the letter report and implement the mitigation according to the Mitigation Monitoring and Reporting Program for the project. If species are transplanted for mitigation, these species will be included in a plant salvage and translocation plan according to mitigation measure **MM-BIO-5**.

MM-BIO-5 Prior to trail grading for Segment 6b, if Dehesa beargrass is being impacted and translocation is selected as part of the mitigation package according to the letter report prepared under mitigation measure MM-BIO-4, a plant salvage and translocation plan shall be prepared for Dehesa beargrass impacted by the project. The plan shall, at a minimum, evaluate options for plant salvage and relocation, including native plant mulching, selective soil salvaging, application of plant materials on manufactured slopes, and application/relocation of resources within the Study Area. Relocation efforts may include seed collection and/or transplantation to a suitable receptor site and will be based on the most reliable methods of successful relocation. The program shall contain a recommendation for method of salvage and relocation/application based on feasibility of implementation and likelihood of success. The program shall include, at a minimum, an implementation plan, maintenance and monitoring program, success criteria, estimated completion time, and any relevant contingency measures. The resource salvage plan shall be prepared by a County-approved biologist and shall be implemented according to the Mitigation Monitoring and Reporting Program for the project.

MM-BIO-6 Mitigation for Segment 6b permanent impacts to 0.01 acre of Potential Hermes Copper Butterfly Habitat shall occur at a 1:1 ratio with 0.01 acre of Potential Hermes Copper Butterfly Habitat in the South County MSCP area, within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-7 If heavy equipment would be in operation in Segment 1 during the breeding season for least Bell's vireo (March 15 to September 15), coastal California gnatcatcher (March 1 to August 15), general avian species (February 1 – September 15), or raptors (January 15 – July 15), pre-construction survey(s) shall be conducted by a qualified biologist, as appropriate, to determine whether these species occur within the areas potentially impacted by noise. If it is determined at the completion of pre-construction surveys that active nests belonging to these sensitive species are absent from the potential impact area (within 300 feet for passerines, 500 feet for raptors, or as otherwise determined by a qualified biologist), construction shall be allowed to proceed. If pre-construction surveys determine the presence of active nests belonging to these species, then the grading contractor will install noise attenuation materials within the work area to reduce the grading noise levels to below 60 dBA L_{EQ} , unless a qualified biologist determines that noise attenuation is not necessary due to existing barriers, ambient noise levels, or other biological factors relevant to the species present. The type of material and location of installation will be determined prior to installation in coordination with a qualified biologist knowledgeable of that species and in coordination with a qualified acoustician. All noise attenuation materials will be installed prior to construction, and noise monitoring will be implemented to help ensure grading noise is below 60 dBA L_{EQ} at the edge of the species' habitat both during noise attenuation installation (if installed during the breeding season) and during construction. Prior to starting construction, the qualified acoustician will provide a written report to DPR and BIA that confirms that noise attenuation is installed and adequately reducing noise levels at the edge of the species' habitat. Noise monitoring will continue into the species' breeding season until grading is completed.

MM-BIO-8 Mitigation for Segment 2a, 2b, or 2c permanent impacts to 0.01 acre of Potential Hermes Copper Butterfly Habitat shall occur at a 1:1 ratio with 0.01 acre of Potential Hermes Copper Butterfly Habitat in the South County MSCP area, within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-9 The following Quino checkerspot butterfly conservation measures apply in the area of Segment 2c shown as Quino Checkerspot Butterfly Avoidance Area on Figure 14d of this project's BRTR.

Step 1, Survey

- Additional Quino host plant mapping was conducted in spring 2020 prior to construction when host plants were blooming, in order to ensure host plant patches are delineated to the greatest extent feasible.

- During 2020 host plant mapping, host plant patches were mapped them using GIS so they can be flagged prior to construction.

Step 2, Avoidance and Minimization Measures:

- Realign or leave trail sections unimproved, as needed, to avoid direct impacts to host plants as much as possible, as mapped during the 2019 Quino focused surveys and refined in 2020.
- All construction within mapped Quino host plant patches will be prohibited during the Quino flight season (defined as 3rd week of February through the 2nd Saturday in May).
- A qualified biologist will monitor construction within the Quino Avoidance Area to ensure that all flagged and mapped host plant locations planned for avoidance are avoided.
- The qualified biologist will conduct environmental awareness training for all entering the site during construction of the project.
- Following trail construction, clearing and trail maintenance within the Quino Avoidance Area shall either occur outside of the Quino flight season or be monitored by a qualified biologist.
- Install signs and/or fencing between the trail and the avoided host plants stating, "Environmentally sensitive area. Please stay on trail," or similar language.

Step 3, Compensatory Mitigation:

- If the trail cannot be redesigned or left unimproved to avoid impacts to all occupied Quino host plant patches, then in addition to the surveys and avoidance and minimization measures in Steps 1 and 2 above, a Section 7 consultation will be required and mitigation will be provided at a ratio determined through Section 7 consultation for impacted host plant patches. Mitigation may consist of one or a combination of on- or off-site planting of host plants, providing long-term maintenance of existing host plants, preserving occupied Quino habitat, or similar measures to the satisfaction of the USFWS.

MM-BIO-10 Mitigation for Segment 2c impacts to 0.71 acre of coastal California gnatcatcher occupied Diegan coastal sage scrub, a Tier II habitat, shall occur at a 1.5:1 ratio with 1.07 acres of Tier II or Tier I habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-11 Mitigation for Segment 3 permanent impacts to 0.02 acre of coastal California gnatcatcher occupied Diegan coastal sage scrub, a Tier II habitat, shall occur at a 1.5:1 ratio with 0.03 acre of Tier II or Tier I habitat in the South County MSCP area, within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-12 Mitigation for Segment 3 permanent impacts to 0.01 acre of Potential Hermes Copper Butterfly Habitat shall occur at a 1:1 ratio with 0.01 acre of Potential

Hermes Copper Butterfly Habitat in the South County MSCP area, within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-13 . The following Hermes copper butterfly conservation measures apply to Segment 4c.

Step 1, Survey

- Conduct focused Hermes copper butterfly survey of the area of Segment 4c shown as Additional Hermes Copper Survey Areas on Figure 7 of this project's BRTR in spring-summer 2020.

Step 2, Avoidance and Minimization Measures:

- Realign the trail within the Study Area, if possible, to avoid direct impacts to occupied Hermes copper butterfly habitat, if mapped during the 2020 focused Hermes copper butterfly survey.
- All construction within occupied Hermes copper butterfly habitat, if any, will be prohibited during the Hermes copper butterfly flight season (defined as 3rd full week of May through the first full week of July).

Step 3, Compensatory Mitigation:

- If the 2020 focused Hermes copper butterfly survey is negative, mitigation for Segment 4c permanent impacts to 0.05 acre of Potential Hermes Copper Butterfly Habitat shall occur at a 1:1 ratio with 0.05 acre of Potential Hermes Copper Butterfly Habitat in the South County MSCP area, within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank. -OR-
- If the 2020 focused Hermes copper butterfly survey is positive and impacts cannot be avoided, mitigation for Segment 4c permanent impacts to 0.05 acre of Occupied Hermes Copper Butterfly Habitat shall occur at a 2:1 or 3:1 ratio, depending on the quality of the habitat at the impact site and the mitigation site, and the importance of the habitat, with 0.10 or 0.15 acre of Occupied Hermes Copper Butterfly Habitat in the South County MSCP area, within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-14 Prior to trail grading in the Segment 4c Additional Study Area shown on Figure 6 of this project's BRTR, rare plant surveys shall be conducted by a County-approved biologist for County List A and B sensitive plant species, including, but not limited to, Dean's milk-vetch (*Astragalus deanei*), Delicate clarkia (*Clarkia delicata*), and Dehesa beargrass (*Nolina interrata*), which are species determined to have a moderate or high potential to occur and that would require additional measures for unavoidable impacts.

Should County List A or B species be identified in the impact areas of the Segment 4c Additional Study Area, the project alignment shall be adjusted to minimize impacts to the maximum extent practicable, consistent with the BMO Section 86.507.a.1. If impacts to County List A or B species are unavoidable, they shall be quantified and limited to no more than 20 percent of the total population in the area, consistent with the BMO Section 86.507.a.1, as determined during pre-construction surveys and documented in a letter report submitted by the County-approved biologist to DPR and BIA. The mapping of plant populations will extend beyond the impact area into the adjacent area that meets that species' habitat requirements, as determined by the County-approved biologist. In addition, impacts shall be mitigated at ratios of 1:1 to 3:1, depending on the sensitivity of the species, consistent with the BMO Section 86.507.a.1, with List B species mitigated at a 1:1 ratio, List A species mitigated at a 2:1 ratio, and federally- or state-listed endangered or threatened species mitigated at a 3:1 ratio.

Mitigation will consist of on- or off-site preservation, translocation, and/or restoration, with a preference for species salvage and transplantation on site if feasible. DPR and BIA will review and approve the letter report and implement the mitigation according to the Mitigation Monitoring and Reporting Program for the project. If species are transplanted for mitigation, these species will be included in a plant salvage and translocation plan according to mitigation measure **MM-BIO-15**.

MM-BIO-15 Prior to trail grading in the Segment 4c Additional Study Area shown on Figure 6 of this project's BRTR, if County List A or B species will be impacted by the project and translocation is selected as part of the mitigation package according to the survey conducted under mitigation measure MM-BIO-14, a plant salvage and translocation plan shall be prepared for County List A and B species impacted by the project. The plan shall, at a minimum, evaluate options for plant salvage and relocation, including native plant mulching, selective soil salvaging, application of plant materials on manufactured slopes, and application/relocation of resources within the Study Area. Relocation efforts may include seed collection and/or transplantation to a suitable receptor site and will be based on the most reliable methods of successful relocation. The program shall contain a recommendation for method of salvage and relocation/application based on feasibility of implementation and likelihood of success. The program shall include, at a minimum, an implementation plan, maintenance and monitoring program, success criteria, estimated completion time, and any relevant contingency measures. The resource salvage plan shall be prepared by a County-approved biologist and shall be implemented according to the Mitigation Monitoring and Reporting Program for the project.

MM-BIO-16 Mitigation for Segment 5b impacts to 0.07 acre of occupied Hermes Copper Butterfly Habitat, shall occur at a 2:1 or 3:1 ratio, depending on the quality of the habitat at the impact site and the mitigation site, and the importance of the habitat, with 0.14 or 0.21 acre of Potential Hermes Copper Butterfly Habitat in the South County MSCP area, within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

- 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?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: The project would not impact riparian habitats within the vicinity of the project. The project would result in permanent and temporary impacts to sensitive vegetation communities, including coast live oak woodland, Diegan coastal sage scrub, scrub oak chaparral, and non-native grassland. The preferred alignment would impact 2.67 acres of sensitive habitat. These impacts would be considered significant without mitigation. Impacts associated with each trail segment are identified below:

Segment 6a

If implemented, segment 6a would not result in direct impacts to sensitive vegetation communities. Impacts to sensitive natural communities would be considered less than significant.

Segment 6b

If implemented, Segment 6b would avoid impacts to jurisdictional wetlands and riparian habitats as defined by the U.S. Army Corps of Engineer (USACE) and California Department of Fish and Wildlife (CDFW) by using design features such as bridges and puncheons. Implementation of Segment 6b would result in direct impacts to approximately 2.08 acres of sensitive vegetation communities, including 1.67 acres of Diegan coastal sage scrub and 0.41 acre of non-native grassland. Impacts to sensitive natural communities would be considered significant. Impacts would require implementation of mitigation measures **MM-BIO-3** and **MM-BIO-17**.

Segment 1

Segment 1 would result in direct impacts to approximately 0.46 acre of sensitive vegetation communities, consisting of permanent impacts to 0.46 acre of non-native grassland. Impacts to sensitive natural communities would be considered significant. These impacts would require implementation of mitigation measure **MM-BIO-18**.

Segment 2a

Segment 2a would result in direct impacts to approximately 1.95 acres of sensitive vegetation communities, including 1.61 acres of Diegan coastal sage scrub and 0.34 acre of non-native grassland. Impacts to sensitive natural communities would be considered significant. These impacts would require implementation of mitigation measures **MM-BIO-19** and **MM-BIO-20**.

Segment 2b

Segment 2a would result in direct impacts to approximately 2.03 acres of sensitive vegetation communities, including 1.69 acres of Diegan coastal sage scrub and 0.34 acre of non-native grassland. Impacts to sensitive natural communities would be considered significant. These impacts would require implementation of mitigation measures **MM-BIO-21** and **MM-BIO-22**.

Segment 2c

Segment 2c would result in direct impacts to approximately 1.02 acres of sensitive vegetation communities, including 0.71 acres of Diegan coastal sage scrub and 0.31 acre of non-native grassland. Impacts to sensitive natural communities would be considered significant. These impacts would require implementation of mitigation measures **MM-BIO-10** and **MM-BIO-23**.

Segment 3

Segment 3 would result in direct impacts to approximately 0.20 acre of sensitive vegetation communities, including 0.02 acre of Diegan coastal sage scrub, 0.18 acre of scrub oak chaparral, and 0.02 acre of non-native grassland. Impacts to sensitive natural communities would be considered significant. These impacts would require implementation of mitigation measures **MM-BIO-11**, and **MM-BIO-24**.

Segment 4a

Segment 4a would result in direct impacts to approximately 0.06 acre of sensitive vegetation communities, including 0.06 acre of Diegan coastal sage scrub. Impacts to sensitive natural communities would be considered significant. These impacts would require implementation of mitigation measure **MM-BIO-25**.

Segment 4b

Segment 4b would result in direct impacts to approximately 1.95 acres of sensitive vegetation communities, including 1.95 acres of Diegan coastal sage scrub. Impacts to sensitive natural communities would be considered significant. These impacts would require implementation of mitigation measure **MM-BIO-26**.

Segment 4c

Segment 4c would result in direct impacts to approximately 0.86 acre of sensitive vegetation communities, including 0.70 acre of Diegan coastal sage scrub and 0.16 acre of scrub oak chaparral. Impacts to sensitive natural communities would be considered significant. These impacts would require implementation of mitigation measure **MM-BIO-27** and **MM-BIO-28**.

Segment 5a

If implemented, Segment 5a would not result in direct impacts to sensitive vegetation communities. Impacts would be considered less than significant.

Segment 5b

Segment 5b would result in direct impacts to approximately 0.70 acre of sensitive vegetation communities, including, 0.08 acre of coast live oak woodland, 0.02 acre of Diegan coastal sage scrub, 0.51 acre of scrub oak chaparral, and 0.09 acre of non-native grassland. Impacts to sensitive natural communities would be considered significant. These impacts would require implementation of mitigation measures **MM-BIO-29** through **MM-BIO-32**.

For all segments, potentially significant indirect impacts to sensitive habitat resulting from human access, domestic animals, and exotic plant species would be avoided through the implementation of project design features. These include the posting of signs precluding access to areas outside of established trails shall be posted, posting of signs prohibiting off-leash pets, the use of non-invasive, native plant species for revegetation following construction, and the installation of wildlife-friendly fencing to protect Quino host plant areas. No significant impact would occur.

Impacts to sensitive vegetation communities would require the following mitigation:

MM-BIO-17 Mitigation for Segment 6b impacts to 0.41 acre of non-native grassland, a Tier III habitat, shall occur at a 0.5:1 ratio with 0.21 acre of Tier III or better habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-18 Mitigation for Segment 1 impacts to 0.46 acre of non-native grassland, a Tier III habitat, shall occur at a 0.5:1 ratio with 0.23 acre of Tier III or better habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-19 Mitigation for Segment 2a impacts to 1.61 acres of Diegan coastal sage scrub, a Tier II habitat, shall occur at a 1.5:1 ratio with 2.42 acres of Tier II or Tier I habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-20 Mitigation for Segment 2a impacts to 0.34 acre of non-native grassland, a Tier III habitat, shall occur at a 0.5:1 ratio with 0.17 acre of Tier III or better habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-21 Mitigation for Segment 2b impacts to 1.69 acres of Diegan coastal sage scrub, a Tier II habitat, shall occur at a 1.5:1 ratio with 2.54 acres of Tier II or Tier I habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-22 Mitigation for Segment 2b impacts to 0.34 acre of non-native grassland, a Tier III habitat, shall occur at a 0.5:1 ratio with 0.17 acre of Tier III or better habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-23 Mitigation for Segment 2c impacts to 0.31 acre of non-native grassland, a Tier III habitat, shall occur at a 0.5:1 ratio with 0.16 acre of Tier III or better habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-24 Mitigation for Segment 3 impacts to 0.18 acre of scrub oak chaparral, a Tier III habitat, shall occur at a 1:1 ratio with 0.18 acre of Tier III or better habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-25 Mitigation for Segment 4a impacts to 0.06 acre of Diegan coastal sage scrub, a Tier II habitat, shall occur at a 1.5:1 ratio with 0.09 acre of Tier II or Tier I habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-26 Mitigation for Segment 4b impacts to 1.95 acres of Diegan coastal sage scrub, a Tier II habitat, shall occur at a 1.5:1 ratio with 2.93 acres of Tier II or Tier I habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-27 Mitigation for Segment 4c impacts to 0.70 acre of Diegan coastal sage scrub, a Tier II habitat, shall occur at a 1.5:1 ratio with 1.05 acres of Tier II or Tier I habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-28 Mitigation for Segment 4c impacts to 0.16 acre of scrub oak chaparral, a Tier III habitat, shall occur at a 1:1 ratio with 0.16 acre of Tier III or better habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-29 Mitigation for Segment 5b permanent impacts to 0.08 acre of coast live oak woodland, a Tier I habitat, shall occur at a 2:1 ratio with 0.16 acre of Tier I habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-30 Mitigation for Segment 5b impacts to 0.02 acre of Diegan coastal sage scrub, a Tier II habitat, shall occur at a 1.5:1 ratio with 0.03 acre of Tier II or Tier I habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-31 Mitigation for Segment 5b impacts to 0.51 acre of scrub oak chaparral, a Tier III habitat, shall occur at a 1:1 ratio with 0.51 acre of Tier III, Tier II, or Tier I habitat in the South County MSCP area, within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-32 Mitigation for Segment 5b permanent impacts to 0.09 acre of non-native grassland, a Tier III habitat, shall occur at a 0.5:1 ratio with 0.05 acre of Tier III or better habitat in the South County MSCP area within a biological resource core area. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

Implementation of these mitigation measures would reduce project-level impacts to sensitive communities to less than significant. Furthermore, as the project would provide mitigation in accordance with County and regulatory agency guidelines, the project's contribution to cumulative impacts would not be considered significant.

- 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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant: According to the BRTR, the proposed project would not result in significant impacts to USACE and RWQCB non-wetland Waters of the U.S./State or CDFW-jurisdictional riparian habitat and streambed for Segments 1 through 6b (HELIX 2020b), as detailed in section IV.b. In addition, the proposed project would not use groundwater, or otherwise impact the functions and values of existing wetlands. Therefore, the proposed project would result in less than significant impacts and would not result in cumulatively considerable impacts.

- 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?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact with Mitigation Incorporated: The proposed project is in a relatively undeveloped part of San Diego County and occurs within the McGinty Mountain/Sycuan Peak-Dehesa Biological Resource Core Area (BRCA). The area consists of continuous blocks of habitat, including the SDNWR located northwest and south of the study area. Wildlife movement in the area has already been impacted by the construction of Dehesa Road and Sloane Canyon Road, residential and commercial development, former mineral extraction activities and creation of Lake Emma, and agriculture, as well as the presence of existing trails, maintenance, and access roads.

The proposed trail is not expected to substantially interfere with habitat connectivity between blocks of habitat as wildlife may use the proposed trail. The proposed trail would not substantially interfere with the ability of wildlife species to disperse to adjacent open space areas, as adequate connectivity is maintained. The proposed project would not propose fixed nighttime lighting that would promote nighttime usage. The project would conform to the goals and requirements of the County MSCP Subarea Plan and BMO, including effects on habitat linkages and wildlife corridors. The proposed project would maintain connectivity within the core wildlife habitat, to adjacent linkages, and to adjacent, undeveloped habitat. With the project's location within and adjacent to undeveloped areas, incorporation of design features, and implementation of the previously identified habitat mitigation measures **MM-BIO-3, MM-BIO-11, MM-BIO-10, and MM-BIO-17** through **MM-BIO-32**, project impacts would be less than significant.

- e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant: The project occurs within the boundaries of the adopted South County MSCP. The proposed project would be consistent with the MSCP and BMO by mitigating for impacts to native habitat at applicable ratios, thereby enhancing breeding, foraging, and dispersal habitat for listed species that have been documented within the Study Area. The project's consistency with the MSCP is detailed in the MSCP Conformance Guidelines, Appendix B of the BRTR (HELIX 2020b). In addition, the project would conform to the goals and

requirements established for habitat linkages and wildlife corridors. No other adopted Habitat Conservation Plan (HCP), Resource Management Plan (RMP), Special Area Management Plan, Watershed Plan, or other regional planning efforts are applicable to the project. Therefore, the proposed project would not conflict with local policies or ordinances, or other approved local, regional, or State Habitat Conservation Plans. Therefore, project impacts would be less than significant.

V. CULTURAL RESOURCES -- Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: A Cultural Resources Technical Report was prepared for the proposed trail (HELIX 2020c; Appendix C). A California Historical Resources Information System file search and field survey were conducted to determine the presence or potential presence of historical resources within or adjacent to the proposed trail segments. A total of three historic-period resources were identified. Resource SCD-S-005, which consists of a concrete foundation with the remnants of walls, was identified within the vicinity of Segments 2a and 2b. The proposed trail alignment for Segments 2a and 2b would be routed this around resource. Therefore, no impacts would occur to the site as a result of the project. Two additional historic period resources, CA-SDI-12104 and SCD-S-013, were identified within the vicinity of Segment 6b; however, these resources are located outside of the project's limits of project-related permanent impacts and direct effects Area of Potential Effect (APE) and would not be impacted by the project. Therefore, the proposed trail would not result in a substantial adverse project or cumulative-level impact on the significance of a historical resource.

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: A Cultural Resources Technical Report was prepared for the proposed trail (HELIX 2020c; Appendix C). A file search and field survey were conducted to determine the presence or potential presence of archaeological resources within the proposed trail segments. The results for each segment are described below:

Segment 6a

Trail Segment 6a is located along the southern edge of Dehesa Road. A low-to-moderate-density-scatter of lithic debitage and pottery associated with the CA-SDI-4519 site complex was observed on both sides of Dehesa Road during the field survey. The direct effects APE along this portion of the site is situated along a disturbed road shoulder that has been cut into the hillside and as such, the artifacts observed within the Segment 6a study area may have been redeposited from the main site area located upslope and north of Dehesa Road. However, it may also be possible that the site extends on the south side of Dehesa Road towards the bank of the Sweetwater River; however, this area is within private property and has not been included in previous archaeological surveys or studies.

Any portion of the CA-SDI-4519 site complex not previously mitigated through a data recovery program would be considered to be significant. As such, this resource would be treated as eligible for listing and a historic properties treatment plan (HPTP) and a monitoring plan will be developed prior to project construction to ensure appropriate treatment of any cultural resources recovered from within the study area. Impacts within the Segment 6a Study Area would be potentially significant but will be less than significant with implementation of mitigation measures **MM-CUL-1** and **MM-CUL-2**.

Segment 6b

Trail Segment 6b is located north of Dehesa Road and contains largest number of archaeological resources. A total of 12 prehistoric resources are situated within the study area of Segment 6b, including the CA-SDI-4519 site complex (also located within Segment 6a, discussed above), and 11 resources containing bedrock milling features (with one resource also containing a pictograph, and several with associated surface artifacts). As discussed in the Cultural Resources Technical Report, these resources along with several other resources recorded in the vicinity of the Sweetwater River valley along Dehesa Road and Willow Glen Drive, are likely associated with the ethnographic village of *Matamo* (HELIX 2020c).

If the Segment 6b alignment is chosen, it would replace Segments 1 and 6a, which are located on the south side of Dehesa Road. The design of Segment 6b will route the trail around the bedrock milling features located within the Study Area. Regardless, the 11 previously unevaluated prehistoric resources would be treated as eligible for listing, and if Segment 6b is chosen as the preferred trail alignment along Dehesa Road, a HPTP and monitoring plan would be developed prior to project construction to ensure appropriate treatment of the cultural resources that would be affected by the project.

Segment 1

One archaeological resource, SCD-S-001, has been identified within the Study Area and APE of Segment 1. This resource is a single, low-lying bedrock milling feature. This site has not been evaluated for listing in the California Register of Historical Resources (CRHR) or the National Register of Historic Places (NRHP) and the feature would be preserved in place, as the trail alignment would travel around the feature and would therefore not affect it. Impacts within the Segment 1 Study Area would be less than significant.

Segments 2a, 2b, and 2c

One prehistoric archaeological resource, SCD-S-004, has been identified within the study area of Segments 2a, 2b, and 2c. Due to the disturbed location in which the artifacts were found, the resource does not retain sufficient integrity to be eligible for listing on the CRHR or NRHP.

Segment 3

No cultural resources have been identified within the study area of Segment 3.

Segments 4a, 4b, and 4c

No cultural resources have been identified within the study area of Segment 4a, 4b, and 4c.

Segment 5a and 5b

No cultural resources have been identified within the study area of Segment 5a and 5b

It is possible ground-disturbing activity, even in areas with no known cultural resources, could impact previously unrecorded cultural resources. For this reason, mitigation measures **MM CUL-1** and **MM CUL-2** will be required for all segments of the proposed trail construction.

Mitigation measure **MM-CUL-1** would consist of the following:

MM-CUL-1: A Historic Properties Treatment Plan/Monitoring Plan shall be prepared for the project. Both archaeological and Native American monitors shall have the authority to temporarily halt or redirect grading and other ground-disturbing activity in the event that cultural resources are encountered. If significant cultural material is encountered, appropriate actions shall be implemented according to the protocols outlined in the HPTP and monitoring plan. The treatment plan will present the measures that will be implemented to address the avoidance and preservation, minimization of impacts, or mitigation of potential impacts/adverse effects to significant cultural resources. The report shall include methodologies to retrieve, recover, and protect cultural resources. The County shall approve the HPTP prior to construction activity.

Mitigation measure, **MM-CUL-2** would consist of the following:

MM-CUL-2: All ground-disturbing activity related to implementation of the project, including potential construction, trenching, and grading associated with trail installation, shall be monitored by a qualified archaeologist and Native American representative. The monitoring program shall include attendance by the archaeologist and Native American monitor at a preconstruction meeting with the construction contractor and the presence of archaeological and Native American monitors during initial ground disturbing activities. If cultural resources are discovered during monitoring, all work within 50 feet of the discovery shall stop until a qualified archaeologist can evaluate the find and make appropriate recommendations for treatment, per the HPTP and monitoring plan. Both archaeological and Native American monitors shall have the authority to temporarily halt or redirect grading and other ground-disturbing activity in the event that cultural resources are encountered.

If the archaeological monitor, in conjunction with the Principal Investigator and Native American monitor, determines that monitoring within any specific portion of the trail

alignment is not warranted, due to high slopes or if it is observed after monitoring of initial ground disturbance that the ground surface does not contain soil with the potential for subsurface cultural material to be present, the County shall be informed as such and will make the final determination on the necessity for additional monitoring.

Should the project limits change to incorporate new areas of proposed disturbance, an archaeological survey of these areas would be required. With the implementation of mitigation measures **MM-CUL-1** and **MM-CUL-2**, potential impacts to archeological resources would be reduced to a less than significant level and would not contribute to a potentially cumulative impact on archaeological resources.

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

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: As previously discussed, a file search and field survey were conducted for the proposed project to determine the presence or potential presence of cultural resources, including human remains, within the project site. The Cultural Resources Technical Report did not identify previously recorded sites with human remains within the project site (HELIX 2020c). However, due to the number of archaeological resources recorded in the surrounding area, there is a potential for unidentified human remains to be present within the project site. If present, the human remains could be damaged by ground-disturbing activities associated with the project. Mitigation measure **MM-CUL-3** would reduce impacts to a level less than significant.

MM-CUL-3: Any ground-disturbing activities must be considered as having the potential to encounter Native American human remains. Human remains require special handling and must be treated with appropriate dignity. Specific actions must take place pursuant to State CEQA Guidelines Section 15064.5(e); Public Resources Code Section 5097.98; and Section 87.429 of the County of San Diego Grading, Clearing and Watercourses Ordinance.

Should Native American human remains be identified during ground-disturbing activities related to the project, whether during construction, maintenance, or any other activity, State and County mandated procedures shall be followed for the treatment and disposition of those remains, as follows:

In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, DPR shall ensure that the following procedures are followed:

1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
 - a. A County (DPR) official is contacted.

- b. The County Coroner is contacted to determine that no investigation of the cause of death is required.
 - c. If the Coroner determines the remains are Native American, then:
 - i. The coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours.
 - ii. The NAHC shall identify the person or persons it believes to be most likely descended from the deceased Native American.
 - iii. The Most Likely Descendent (MLD) may make recommendations to the County, or the person responsible for the excavation work, for the treatment of human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.
2. Any time human remains are encountered or suspected, and soil conditions are appropriate for the technique, ground penetrating radar (GPR) shall be used as part of the survey methodology. In addition, the use of canine forensics will be considered when searching for human remains. The decision to use GPR or canine forensics will be made on a case-by-case basis through consultation among the County Archaeologist, the project archaeologist, and the MLD.
 3. Because human remains require special consideration and handling, they must be defined in a broad sense. For the purposes of this document, human remains are defined as:
 - a. Cremations, including the soil surrounding the deposit.
 - b. Interments, including the soils surrounding the deposit.
 - c. Associated grave goods.

In consultation among the County archaeologist, project archaeologist, and MLD, additional measures (e.g., wet-screening of soils adjacent to the deposit or on site) may be required to determine the extent of the burial.

Implementation of mitigation measure **MM-CUL-3** would protect potential human remains that could be encountered at the project site. Therefore, the proposed project would not result in significant impacts or cumulatively considerable impacts on human remains.

VI. Energy -- Would the project:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

San Diego County is served by San Diego Gas and Electric (SDG&E), which provides energy service to over 3.4 million customers (with 1.4 million accounts) in the county and portions of southern Orange County. The utility has a diverse power production portfolio, composed of a

variety of renewable and non-renewable sources. Energy production typically varies by season and by year. Regional electricity loads also tend to be higher in the summer because the higher summer temperatures drive increased demand for air-conditioning. In contrast, natural gas loads are higher in the winter because the colder temperatures drive increased demand for natural gas heating.

Less Than Significant Impact: The proposed project would provide a regional and community trail connection between two existing regional trails. During construction, energy consumption would be in the form of fuel consumed for construction equipment and motor vehicles used to access the site.

If Segment 6b is chosen, the proposed project may require additional energy use from the signalized intersection at Dehesa Road and Sloane Canyon Road, however, energy use from a single signalized intersection would be minimal.

If Segments 1 and 6a are chosen as the preferred alignments, implementation of the proposed project would not generate additional energy usage, as the project does not propose permanent structures, lighting, or other features requiring energy use.

Because the project connects two existing regional trails currently available for public use, and the project would not significantly expand capacity, energy usage from increased use would be minimal. The project would generate a small demand on local and regional fuel supplies during construction that would be easily accommodated. Moreover, this demand for fuel would have no noticeable effect on peak or baseline demands for energy. Therefore, the project would not result in a wasteful, inefficient, or unnecessary usage of direct or indirect energy.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The applicable renewable energy plan for the project area would be the State Renewable Portfolio Standards (RPS), which requires utility agencies to ensure a certain percentage of the electricity they sell is from a renewable source. Senate Bill (SB) 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. Moreover, the County has installed renewable energy at many of its facilities. The County itself produces 2.9 megawatts each year, which offsets some of the County's consumption, and the County anticipated a production of 13 megawatts by the end of 2019 (County Department of General Services 2019).

Construction of the proposed project would consume energy in the form of fuel for construction equipment and motor vehicles to access the site. However, operation of the proposed project would not require energy in excess of the existing usage. As previously described in section VI.a, energy usage associated with construction would be minimal. Therefore, the project would not obstruct the implementation of the RPS, nor would it result in energy consumption that would

require the County to install more production. 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.

VII. GEOLOGY AND SOILS -- Would the project:

- 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.
- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within a County Special Study Zone (County of San Diego 2007). The Geotechnical Evaluation for the project (Ninyo & Moore 2020; Appendix D) states that the nearest active fault is the Rose Canyon fault, approximately 17 miles west of the project. An unnamed, pre-Quaternary aged fault is mapped across the western portion of the project across Dehesa Road. However, this fault determined to be inactive. Therefore, there would be no direct or indirect impact from a known fault-rupture hazard zone as a result of this project.

- ii. Strong seismic ground shaking?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The County of San Diego is located within a seismically active region, and the entire County could be subject to seismic ground shaking. While trail users could be exposed to strong seismic ground shaking during a seismic event, this would not differ from existing conditions. To ensure the structural integrity of new structures such as the proposed bridges, the project must conform to the Seismic Requirements as outlined within the California Building Code. Therefore, compliance with the California Building Code and County Code ensures the project would not result in a potentially significant impact, or a cumulatively considerable impact, from the exposure of people or structures to potential adverse effects from strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: There may be a potential for liquefaction in areas with loose sandy soils combined with a shallow groundwater table. Portions of the Study Area are within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards (2007). The project does not propose structures for human occupancy that would be affected by liquefaction. Furthermore, the proposed bridges would be subject to the California Building Code and County Codes and would therefore be designed to reduce adverse effects from seismic-related ground failure, including liquefaction. The proposed project would not include features that would exacerbate the liquefaction potential at the project site and, thus, would not result in a cumulatively considerable impact.

iv. Landslides?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: A portion of the project site is located within a "Landslide Susceptibility Area," or areas where slopes are greater than 25 percent, as identified in the County Guidelines for Determining Significance for Geologic Hazards (2007). Landslide Susceptibility Areas were developed based on landslide risk profiles included in the *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (URS 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25 percent); soil series data (SANDAG based on United State Geological Survey 1970s series); soil-slip susceptibility from United State Geological Survey; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology. The Geotechnical Evaluation for the project (Ninyo & Moore 2020) indicated a low potential for significant slope instability at the site. Furthermore, the proposed project includes constructing multi-use trails, which are primarily located in previously disturbed areas and would not involve activities that would exacerbate existing landslide susceptibility conditions on the project site. Therefore, there would be no potentially significant impact, or cumulatively considerable impact, from the exposure of people or structures to adverse effects of landslides.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The Study Area is underlain by fill soils, colluvium, alluvium, residual soil, and Cretaceous-aged granitic rock (Ninyo & Moore 2020). Fill soils and alluvium were encountered during subsurface evaluations along Segments 1, 2a, 2b, 2c, 5a, 5b, 6a, and 6b; colluvium along Segments 2a, 2b, 2c, 4a, 4b, 4c, 5a, 5b, 6a, and 6b; residual soils along Segments 2a, 2b, 2c and 3; and granitic rock along Segments 2a, 2b, 2c, 3, 5a, 5b, 6a, and 6b, and in rocky outcroppings along Segments 4a, 4b, and 4c. Bluff and slope erosion were observed adjacent to Segment 1 and along Segment 3. The project would be constructed to adhere to the County's Preserve Trail Guidelines (2018) which would minimize erosion within and along the trails following construction through measures such as minimizing slope grades and fall line trail alignments that focus water down the trail.

Development of the proposed project includes grading and ground disturbance which could result in soil erosion. Therefore, the proposed project would be required to obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Construction Permit) from the State Water Resource Control Board (SWRCB). Compliance with the General Construction Permit would require the preparation of a SWPPP for the project site, which would outline the Best Management Practices (BMPs) that would be implemented during construction activities to prevent soil erosion and runoff from the construction site to nearby water bodies. The plan would include operational BMPs to ensure sediment does not erode from the project site. Please see Section X, Hydrology and Water Quality, for further discussion of the SWPPP to be prepared for the proposed project. Due to these factors, construction of the project would not result in substantial soil erosion or the loss of topsoil.

In addition, the project would not contribute to a cumulatively considerable impact because projects that would involve grading or land disturbance are required to follow the requirements of the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (Drainage – Erosion Prevention) and 87.417 (Planting); Order 2001-01 (NPDES No. CAS 0108758), adopted by the San Diego Region RWQCB on February 21, 2001; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) (Ord. No. 9424); and County Storm water Standards Manual adopted on February 20, 2002, and amended January 10, 2003 (Ordinance No. 9426). Furthermore, no cumulative projects were identified within the vicinity of the project. Refer to XXI, Mandatory Findings of Significance, for further discussion.

- 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 an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves ground disturbance for the construction of the proposed trails. Construction of the trails would require the use of retaining walls to prevent geologic instability. Following construction, the multi-use trails would not involve activities that would exacerbate existing landslide, lateral spreading, subsidence, or liquefaction susceptibility conditions on the project site. For further information, refer to VII.a (iii–iv) above.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The identified soils at the project site are identified as having a low shrink swell potential and are therefore not categorized as expansive. Therefore, these soils would not create direct or indirect substantial risks to life or property, nor would the proposed project result in impacts that would be cumulatively considerable.

- 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?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project does not include the installation of septic tanks or alternative wastewater disposal systems. Therefore, no impacts would occur.

- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

San Diego County has a variety of geologic environments and geologic processes that generally occur in other parts of the state, country, and the world. However, some features stand out as being unique in one way or another within the boundaries of the County. High paleontological resource sensitivity is assigned to geologic formations known to contain paleontological localities

with rare, well preserved, critical fossil materials for stratigraphic or paleoenvironmental interpretation, and fossils providing important information about the paleoclimatic, paleobiological and/or evolutionary history of animal and plant groups.

Less Than Significant Impact: A review of the County's Paleontological Resources Maps indicates that the Study Area is underlain by geologic material with no or low potential for producing fossil remains. Although the proposed project would include trail construction including grading and ground disturbance the potential for destruction of a paleontological resource would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS – Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

The State of California has developed guidelines to address the significance of climate change impacts based on Appendix G of the CEQA Guidelines, which contains two significance criteria for evaluating greenhouse gas (GHG) emissions of a project. CEQA Guidelines Section 15064.4 states that the "determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project."

Section 15064.4(b) further states that a lead agency should consider the following nonexclusive list of factors when assessing the significance of GHG emissions:

1. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. The extent to which project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement statewide, regional, or local plans for the reduction or mitigation for GHG emissions.

CEQA Guidelines Section 15064(h)(1) states that "the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable." A cumulative impact may be significant when the project's incremental effect, though individually limited, is cumulatively considerable.

GHGs include carbon dioxide, methane, hydrofluorocarbons, and nitrous oxide, among others. Human-induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources.

Less Than Significant Impact: GHG emissions associated with the project would result from construction activities. Once constructed, emissions would primarily result from the use of motor vehicles by trail users driving to the trail to start out on the trail by foot, horse, or bike and then returning to their motor vehicle to drive to their final destination.

According to the project's Traffic Impact Study, the project would not result in additional vehicular traffic (RICK Engineering 2020, Appendix E). The project's Air Quality and Greenhouse Gas Technical Memorandum for the project prepared by HELIX analyzed construction of the approximately 5 miles of trails that would be constructed upon buildout. Construction assumptions were conservatively analyzed to include all arrangements of the trail segments. Greenhouse gas emissions would be approximately 26 metric tons of carbon dioxide equivalents, amortized over 20 years in accordance with County guidance (HELIX 2020a; Appendix A). Due to the minimal equipment required for trail construction, total project emissions (the sum of construction and operations) would be far below any relevant numerical threshold in the state. Furthermore, the project's incremental contribution to cumulative GHG emissions is determined to not be cumulatively considerable because emissions are far below relevant numerical thresholds. Impacts would be less than significant.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The State passed the Global Warming Solutions Act of 2006, commonly referred to as Assembly Bill (AB) 32, which set the GHG emissions reduction goal for the State of California into law. The law requires that by 2020, state emissions must be reduced to 1990 levels by reducing GHG emissions from significant sources via regulation, market mechanisms, and other actions. The State subsequently passed SB 32, which set an additional GHG emissions reduction goal for the State of California into law. The law requires that by 2030, state emissions must be reduced to 40 percent below 1990 levels by reducing GHG emissions from significant sources via regulation, market mechanisms, and other actions.

To implement State mandates to address climate change in local land use planning, local land use jurisdictions are generally preparing GHG emission inventories and reduction plans and incorporating climate change policies into local general plans to ensure development is guided by a land use plan that reduces GHG emissions. The County's General Plan incorporates various climate change goals and policies. These policies provide direction for individual development projects to reduce GHG emissions and help the County meet its GHG emission reduction targets identified in the County's Climate Action Plan (CAP).

A set of project-specific implementing thresholds are included in the County's Guidelines for Determining Significance and are used to ensure project consistency with the County's CAP and therefore the County General Plan. Regardless of CAP implementation, consistency with the CAP will help ensure consistency with other regional and statewide plans, policies, and regulations. A screening level based on the California Air Pollution Control Officers Association's (CAPCOA) report *CEQA & Climate Change* has typically been used to determine whether further analysis would be needed to examine the GHG impacts of a proposed project (CAPCOA 2008). CAPCOA developed a screening threshold of 900 metric tons (MT) of carbon dioxide equivalents (CO₂e). Direct and cumulative impacts would be potentially significant and require further analysis if the project results in emissions that exceed this threshold beyond current baseline emissions. Because the project would be completed during or after 2020, the 900 MT CO₂e screening threshold would no longer be applicable. Senate Bill (SB) 32 sets a GHG emission reduction target of 40 percent below 1990 levels by 2030, or 540 MT CO₂e. As noted in VIII.a above, the project would generate 26 MT CO₂e during construction. This would be far below the 2030 screening threshold.

The project's use as a public trail connecting two existing trail networks would support alternative modes of transportation to reduce GHG emissions during operations. According to the project's Traffic Impact Study, the project would not result in additional vehicular traffic (RICK Engineering 2020, Appendix E). Furthermore, the project's incremental contribution to cumulative GHG emissions is determined to not be cumulatively considerable because emissions are far below relevant numerical thresholds. Impacts would be less than significant.

The project's minimal incremental contribution to cumulative GHG emissions is determined to not be cumulatively considerable because GHG emissions would be approximately 26 metric tons of carbon dioxide equivalents an amount far below any relevant numerical thresholds. The project's GHG emissions are, therefore, determined to be consistent with the CAP and General Plan which together are the most applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

IX. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project proposes several multi-use, non-motorized trail segments that would provide a regional and community trail connection between two existing

regional trails. The use of hazardous materials (e.g., fuels, lubricants, solvents) would be required during construction of the proposed project. However, the project would not result in a significant hazard to the public or environment because all storage, handling, transport, emission and disposal of hazardous substances during construction would be in full compliance with applicable regulations such as the Federal Resource Conservation and Recovery Act (RCRA), Department of Transportation (DOT) Hazardous Materials Regulations, and the local Certified Unified Program Agency (CUPA) regulations. These regulations provide tracking methods, standards and procedures for the management of hazardous materials, as well as spill response measures. Because compliance with these regulations is mandatory, construction activities are not anticipated to create a significant hazard to the public through use, transport, or disposal of hazardous materials.

Following construction, the project would operate as a recreational trail, and would not involve the routine use and storage of hazardous materials. California Government Code Section 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, Section 25500-25520.

The San Diego County Department of Environmental Health Hazardous Materials Division (DEH HMD) is the CUPA for San Diego County responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, the DEH HMD is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The Hazardous Materials Business Plan is required to contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of on site. The plan also contains an emergency response plan that describes the procedures for mitigating a hazardous release, procedures and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the HMD, the Office of Emergency Services, and other emergency response personnel such as the local fire agency having jurisdiction. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the DEH HMD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations, to identify safety hazards that could cause or contribute to an accidental spill or release, and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances.

Therefore, due to the limited use of hazardous materials during construction, the project would not result in potentially significant, or cumulatively considerable, impacts related to the routine transport, use, and disposal of hazardous substances or related to the accidental explosion or release of hazardous substances.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact. Dehesa Elementary School is located north of Dehesa Road near the intersection of Dehesa Road and Sloane Canyon Road. Segments 1, 2a, 2b, 2c, and 6b would be located within one-quarter mile of Dehesa Elementary School. As stated in IX.a, the use of hazardous materials would be required during construction of the proposed project. The use of hazardous materials during construction would comply with applicable regulations. Operation of the project's trails following construction would not involve the routine use, storage, disposal, and/or transport of hazardous materials. Therefore, the project would not result in any potentially significant, or cumulatively considerable impacts on an existing or proposed school.

- c) 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?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: A regulatory database search was conducted for the project's Study Area using the Department of Toxic Substances Control (DTSC) Envirostor Database, compiled pursuant to Government Code Section 65962.5, and the State Water Resources Control Board's Geotracker database. No sites were found in the DTSC Envirostor database. The Geotracker database identified one site within the Study Area located at 3605 Dehesa Road, adjacent to the alignments of Segments 1, 6a, and 6b. According to Geotracker, a former leaking underground storage tank released motor oil and lubricating contaminants. An investigation and remedial action were completed, and a no further action letter was issued in 1998. Furthermore, the storage tanks have since been removed and the contamination remediated. Therefore, impacts to the public or environment or result in cumulatively considerable impacts related hazardous materials sites would be less than significant.

- d) 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?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site is not located within an airport land use plan or within two miles of a public or public use airport. The nearest public airport, Gillespie Field, is approximately 5 miles to the northwest. Furthermore, the proposed project does not propose construction of habitable

or above-ground structures that extend above the surrounding grade. The project would not constitute a safety hazard or excessive noise for people residing or working in the vicinity of the project and would not result in a cumulatively considerable impact related to such a safety hazard.

- e) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

The following sections summarize the project's consistency with applicable emergency response plans or emergency evacuation plans.

i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN

Less Than Significant Impact: The County-wide Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in San Diego County, including all cities and the County unincorporated areas. The project would not interfere with these plans because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. Impacts to the Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan would be less than significant.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

No Impact: The nearest operating or formerly operating nuclear power station is the San Onofre Nuclear Generating Station, approximately 55 miles northwest of the project. The project would not interfere with the San Diego County Nuclear Power Station Emergency Response Plan due to its location and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. The project is not within 10 miles of the plant and as such would not interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

No Impact: The Oil Spill Contingency Element relates to oil spills along the coastal zone or coastline. The project would not interfere with the Oil Spill Contingency Element because the project is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

No Impact: The project would not interfere with the Emergency Water Contingencies Annex and Energy Shortage Response Plan because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct or the connection between Loveland Reservoir and Sweetwater Reservoir, both of which are potable water reservoirs.

v. DAM EVACUATION PLAN

Less Than Significant Impact: The project would be located adjacent to the Sweetwater River, downstream from the Loveland Reservoir. Dam evacuation plans are maintained by the County Office of Emergency Services. These plans contain information concerning the physical situation, affected jurisdictions, evacuation routes, unique institutions, and event responses. The project does not propose the construction of unique institutions such as hospitals, schools, retirement facilities, or childcare facilities. The trails would be open to nearby areas and would not constrain large groups of people within an inundation zone. As such, the project would not require the evacuation of large concentrations of people.

Due to the proposed project's consistency with all applicable emergency response plans or emergency evacuation plans, the proposed project would not have the potential to result in cumulatively considerable impacts related to emergency planning.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project site is within a Very High Fire Hazard Severity Zone as designated by the California Department of Forestry and Fire Protection (CAL FIRE) in the "Very High Fire Hazard Severity Zones in LRA" (CAL FIRE 2009). The area has burned during previous wildfires, including the 1970 Mount Laguna Fire and the 2003 Cedar Fire. Two fires burned in the vicinity of the project in 2019.

The proposed project could exacerbate existing conditions on the project site by introducing people and additional structures to a Very High Fire Hazard Severity Zone, which could increase the possibility of fires started from human-made sources (i.e., lighters, campfires, sparks from vehicles, etc.). Several rules have been developed by the County to reduce risk of loss of

property, injury, or death due to exposure to wildland fire throughout the County jurisdiction. The proposed project would comply with the rules relating to emergency access, water supply, and defensible space specified in the County Code of Regulatory Ordinances, Title 3, Division 5, Chapter 3 and Appendix II-A of the Uniform Fire Code.

The trails would be closed to the public during a wildfire event, and County DPR would work closely, in compliance with the Operational Area Emergency Plan, with the regional Fire Departments, CAL FIRE, and the County Office of Emergency Services to manage potential wildfire events.

The County would post and enforce park facility regulations in accordance with the San Diego County Code of Regulatory Ordinances, Title 4 Public Property, Division 1. Parks and Recreation, Chapter 1. These rules include, but are not limited to the prohibition of smoking, campfires, open flames and the prohibition of fireworks, firearms, weapons, air guns, archery devices, slingshots, or explosives of any kind across, in or into a County park. These park rules would reduce potential impacts related to human-caused wildland fires along the trails.

Upon confirmation of the project's compliance with all fire rules, impacts would be less than significant. Furthermore, the project would not contribute to a cumulatively considerable impact because past, present, and future projects are required to comply with the County Code of Regulatory Ordinances and the Uniform Fire Code.

- g) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: Water sources, including the Sweetwater River, Harbison Canyon Creek, and Lake Emma, are located in the vicinity of all trail segments. Standing water is a potential breeding ground for mosquitos. The County Vector Control program (VCP), managed by DEH, implements vector management activities to protect public health from the impacts of vector-borne diseases. DEH regularly inspects and treats as necessary, mosquito-breeding sources. Treatment of County water sources, if needed, may include biological control, such as fish, or chemical control.

The project would not construct uses that allow water to stand for a period of 72 hours (3 days) or more. The proposed project would involve uses that would produce additional animal waste at the site by providing trails for equestrian day-use. It is anticipated that a few equestrian users would visit the project site each day. Manure from the equestrian uses could attract flies or other vectors. However, the project would not be designed to congregate trail users in singular locations. Equestrian users would be distributed along the approximately 5 miles of trails, and would not be constrained to specific areas or concentrated in a manner that would expose

existing rural residences, such as those adjacent to Segment 1 and 6a along Dehesa Road, to flies or other vectors. Horses and equestrian recreation are already common within the community, including the California Riding and Hiking Trail to the east. Furthermore, the project does not propose residences or permanent horse stalls, so it would not expose existing or future residents to vectors.

Therefore, the proposed project would not substantially increase current or future residents' exposure to vectors, including mosquitoes, rats, or flies or create a cumulatively considerable impact because no uses on site would produce significant sources of vectors.

X. HYDROLOGY AND WATER QUALITY -- Would the project:

- a) Violate any water quality or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less Than Significant Impact: The construction of the proposed project would include activities that would disturb surface soils. During construction, exposed soils have the potential to temporarily increase the amount of sediment in runoff from the project site during a storm event. The proposed project would be required to comply with the existing General Plan and obtain from the SWRCB an NPDES General Construction Permit. Compliance with the General Construction Permit would require the preparation of a SWPPP for the project site, which would identify potential pollutants and outline the BMPs that would be implemented during construction activities to prevent those pollutants from entering nearby water bodies. Therefore, the proposed project would not violate waste discharge requirements or substantially degrade surface or ground water quality. In addition, the project would not create cumulatively considerable water quality impacts related to waste discharge because, through the permit, the project would conform to Countywide watershed standards in the BMP Design Manual, derived from State regulation to address water quality concerns.

Finally, the project's conformance to the waste discharge requirements listed above ensures the project would not create cumulatively considerable water quality impacts related to waste discharge because, through the permit, the project would conform to Countywide watershed standards in the Jurisdictional Runoff Management Program and BMP Design Manual, derived from State regulation to address human health and water quality concerns. Therefore, the project would not contribute to a cumulatively considerable impact on water quality from waste discharges.

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

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: The proposed project is the construction of a non-motorized trail that would connect two existing regional non-motorized trails. A small amount of water would be brought to the site during construction for dust control, however the project would not involve the use groundwater for irrigation, or domestic or commercial demands. In addition, trail surfaces would be pervious so as not to affect groundwater recharge, and the project does not involve operations that would interfere substantially with groundwater recharge. Specifically, the project does not involve regional diversion of water to another groundwater basin; or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g. one-quarter mile). These activities and operations can substantially affect rates of groundwater recharge. Therefore, no impact on groundwater resources is anticipated.

- 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 substantial erosion or siltation on- or off-site?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less Than Significant Impact: The proposed trail would connect two existing regional trails. The trail would be constructed with pervious materials so as not to result in increased siltation or erosion. A SWPPP would be prepared for the project during construction to control water quality; however, its implementation would result in BMPs to prevent the erosion process from occurring and to prevent sedimentation. Furthermore, the project upon completion would not introduce impervious surfaces that would redirect water flows. The project would provide two puncheon bridges along Segment 1 to prevent the disturbance of existing drainages within that segment. In addition, drainage patterns for some trail segments would be identical to existing conditions. These include the Segments 4a and 5a located entirely within the existing ROW, the entirety of Segment 3 located along an existing trail, and portions of Segment 2a, 2b, and 2c located along existing ROW. New trail segments also would not substantially alter the existing drainage pattern. Due to these factors, the project would not result in significantly increased erosion or sedimentation potential and would not significantly alter any drainage patterns of the

site or area on- or off site. In addition, because erosion and sedimentation would be controlled within the Study Area, the project would not contribute to a cumulatively considerable impact.

- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project will not alter the course of any stream or river or increase the rate or amount of surface runoff in a manner that would result in flooding. Construction of the proposed project would involve construction activities, such as grading, that may temporarily alter drainage patterns. However, these are temporary activities, and construction BMPs would be implemented as part of the SWPPP required for the project in order to reduce potential impacts on drainage patterns. Construction activities would not include the addition of impervious surfaces that would result in increased runoff quantities or rates. The existing landforms may be altered in a way that would require cutting of hillsides, placement of retaining walls, and construction of bridges. These changes may change the localized conditions surrounding those areas. However, the project trails would be designed to maintain the overall water flows and direction of runoff across the Study Area. Furthermore, the placement of non-vehicular puncheons and bridges within the flood plain would require the approval of a no-rise certification from San Diego County Flood Control to ensure the project would not increase flood heights. The project would not substantially modify existing landforms or create significant changes in the existing drainage patterns in the Study Area which would result in flooding on- or off site.

Therefore, the project would not substantially increase impervious surfaces or alter the course of a stream or river in such a way that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off site. Moreover, the project would not contribute to a cumulatively considerable increase in the rate or amount of runoff because the project would not substantially increase water surface elevation or runoff exiting the site.

- 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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project would not create or contribute significant runoff water which would exceed the capacity of stormwater drainage systems or provide substantial additional sources of polluted runoff. There are no existing or planned stormwater drainage

systems proposed by the project, nor does the project require such systems. The proposed project would involve the construction of pervious trails and would not involve paving or other impervious surfaces which would increase runoff. The trails would be designed to facilitate existing drainage and flows similar to existing conditions. A SWPPP and BMPs would be implemented to prevent impacts to water quality and runoff during construction. Therefore, the proposed project would not result in significant impacts related to stormwater drainage systems and would not have the potential for cumulatively considerable impacts.

iv. Impede or redirect flood flows?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project would not impede or redirect flood flows. There are no existing or planned stormwater drainage systems proposed by the project, nor does the project require such systems. The proposed project would not include substantial grading or earthmoving that would impede or redirect water flow on site in the case of a flood. The project includes the construction of new non-vehicular puncheons and bridges in Segments 1, 2a, 2b, 2c, and 5b. These structures would require approval of a no-rise certification from San Diego County Flood Control to ensure that they have been designed to not impede existing drainage and flows. Therefore, the proposed project would not include features that would result in a significant impact, or potentially cumulatively considerable impact, on flood flows.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

i. SEICHE

No Impact: The project site is located in the vicinity of Lake Emma. The project does not propose large-scale construction activity that would lead to a disturbance or oscillation in the water level of Lake Emma that could produce a seiche.

ii. TSUNAMI

No Impact: The project site is located approximately 16 miles from the coast at elevations exceeding 430 feet; therefore, in the event of a tsunami, it would not be inundated.

iii. MUDFLOW

Less Than Significant Impact: Mudflow is a type of landslide. The site is located within a "Landslide Susceptibility Area." However, no landslides were noted underlying the project site (Ninyo & Moore 2020). The trails would not be constructed in a manner that would exacerbate the risk of mudflows. Therefore, it is not anticipated that the project would expose people or property to inundation due to a mudflow.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: As discussed under threshold question X.a., the proposed project would comply with the existing General Plan and obtain from the SWRCB an NPDES General Construction Permit. The project's use as a trail would not involve an increase in impervious material that would hinder groundwater recharge. Therefore, the proposed project would not be in conflict with or obstruct implementation of the applicable water quality management plans for the region. In addition, the project's conformance with the site design measures and BMPs of the required permits would ensure the proposed project would not have the potential for cumulatively considerable impacts to potentially conflict with or obstruct implementation of applicable plans.

XI. LAND USE AND PLANNING -- Would the project:

a) Physically divide an established community?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project does not propose the introduction of new infrastructure such as major roadways or other features that would interfere with, or physically divide, nearby residences. Therefore, the proposed project would not divide the established community. Rather, the proposed trail would provide additional connectivity between two existing regional trails. Similarly, the proposed project would not result in cumulatively considerable impacts on an established community.

- 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?

- ☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: Land uses for each segment are shown in Table 2, *Project Land Uses*.

Table 2 Project Land Uses	
Segment	General Plan Land Use
Segment 6a	Rural Lands (RL-20); Specific Plan Area
Segment 6b	Rural Lands (RL-20); Public Agency Lands; Specific Plan Area
Segment 1	Specific Plan Area
Segment 2a	Specific Plan Area
Segment 2b	Specific Plan Area
Segment 2c	Specific Plan Area
Segment 3	Specific Plan Area; Rural Lands (RL-20)
Segment 4a	Specific Plan Area
Segment 4b	Specific Plan Area
Segment 4c	Specific Plan Area; Rural Lands (RL-20)
Segment 5a	Specific Plan Area
Segment 5b	Specific Plan Area

Portions of Segment 6a, 6b, and 3 are located within the Rural Lands (RL-20) land use designation. This designation is compatible with the General Plan Rural Lands Regional Category. Regional Categories provide a framework for the regional distribution of uses that serves as the foundation for the County's goals, policies, and guiding future development of privately-owned land. The project does not propose residential development and is, therefore, consistent with the General Plan designation. Public trails are consistent with the Rural Lands designation and the General Plan Conservation and Open Space Element and the Mobility Element, and the County Trails Program.

The entirety of Segments 1, 2a, 2b, 2c, 4a, 4b, 5a, and 5b are located within the Specific Plan Area (SPA) designation. Portions of Segments 6a, 6b, 3, and 4c are located within the SPA designation. The Study Area is located within the Conrock/Fenton SPA, which encompasses areas south of Dehesa Road and surrounding Sloane Canyon. The approved SPA only provides for extraction of the aggregate sand resource of the Sweetwater River. The project does not propose extraction or uses that would permanently prohibit future extraction within the SPA.

The project would implement a portion of the Sweetwater Loop and River Trail as proposed in the County's Community Trails Master Plan. The plan examined existing trail opportunities in the County to provide residents with a wide variety of trail opportunities.

The project is located within the Crest/Dehesa/Harbison Canyon/Granite Hills Community Plan Area. This plan defines Resource Conservation Areas which require special attention to conserve resources in a manner best satisfying public and private objectives. Segments 1, 2a, 2b, 2c, 3, 4a, 4b, 4c, 5a, 5b, and 6b would be located within the McGinty Mountain, Sycuan Creek, Japatul Road, Loveland Drainage, Loveland Reservoir Resource Conservation Area. Projects within this area are to be given careful consideration and analysis, as described in the Community Plan.

The project proposes the construction of a trail alignment to connect to an existing trail network. Due to the project's recreational use, the establishment of new unpaved trails would not propose development or promote new development in the existing community.

The following goals and policies of the Land Use Element are relevant to the proposed project:

Policy LU-6.7: Open Space Network: Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities.

Policy LU-6.9: Development Conformance with Topography: Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.

The proposed project would be consistent with this open space policy because it would not diminish the existing opportunities for habitat preservation, and it would connect existing trails. The project would also conform to the natural topography through the use of retaining walls to limit grading and retain the dominant characteristics of the Study Area. The following goals and policies established by the Crest/Dehesa/Harbison Canyon/Granite Hills Community Plan would be relevant to the proposed project:

Pedestrian Goal CM 5.1: A network of safe community pedestrian pathways that connect residential areas with schools, churches, parks, and commercial areas.

Policy 5.1.1: Require development to provide safe community pathways along roads that lead to and from schools, parks, churches, and commercially-zoned areas, whenever appropriate.

Policy 5.1.2: Encourage a network of decomposed granite pathways adjacent to public roads that will safely accommodate non-motorized travel modes.

Policy 5.1.3: Prohibit concrete paved sidewalks in the Subregion, whenever feasible, while requiring development to provide unpaved walking compact decomposed granite paths

Bicycle and Trails Goal CM 6.1: A well-connected and maintained bicycle and trail network serving the mobility and recreations needs of the Subregion.

Policy 6.1.1: Trail easements are identified for non-motorized mountain bicycle, pedestrian, and equestrian use. Pathways within road ROW are identified for pedestrian and equestrian use. Establish Subregion-specific criteria for providing a trail network of varying easement width requirements depending on topography and land use, based on the following criteria require a:

1) 20-foot wide easement where proposed trails would cross steep and rugged terrain to allow the trail to meander or switch back and forth in order to maintain acceptable grade, and where proposed between residential lots to provide ample room in the event lots are fenced at the trail ROW.

2) 10-foot-wide easement where trails are located adjacent to roads, unless when combined with a 5-foot or 10-foot wide portion (side path) of the road ROW, a 5-foot wide easement will suffice.

Cultural Resources Goal COS 1.4: The preservation of identified archaeological sites through identification and protection of sites in conjunction with development.

Parks and Recreation Goal COS 2.1: A balanced system of recreation facilities and services that meet community needs and enrich the lives of all residents.

The proposed project would be consistent with the abovementioned goals and policies because the proposed project would provide passive recreation for local and regional citizens through the expansion of the regional trail network and avoid cultural resources. Therefore, the proposed project would not result in a conflict with the applicable land use plans, ordinances, and policies, and would have a less-than-significant impact.

The proposed project would not result in a potential cumulative impact related to an environmental effect due to a conflict with an applicable plan because the proposed project would not conflict with existing land use plans that have been adopted for the Crest/Dehesa/Harbison Canyon/Granite Hills Community Plan. Furthermore, no cumulative projects were identified within the vicinity of the project. Refer to XXI, Mandatory Findings of Significance, for further discussion.

XII. MINERAL RESOURCES -- Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less Than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project site been classified by the California Department of Conservation – Division of Mines and Geology as MRZ-2. This designation is applied to lands

where mineral deposits are present or where it is judged that a high likelihood for their presence exists. A portion of the Sweetwater River was previously excavated and mined for construction-quality sand, which has since flooded to create Lake Emma. However, no mining operations are presently occurring on the site. The proposed project would not change existing land uses or prevent the area from being used for mining operations in the future. Therefore, no potentially significant loss of availability of a known mineral resource of value to the region and the residents of the State would result from project implementation.

- 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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project proposes connecting two existing regional trail networks, which would involve the construction of several trail segments. Two puncheon bridges and a bridge for non-motorized uses would be constructed adjacent to existing infrastructure. Trails would only require surface grading. Although some areas within the vicinity of Segment 1 have experienced extraction uses in the past, mineral sources may still be present in the Study Area. However, due to the project's use as a recreational trail, the project would not result in the permanent loss of availability of locally important mineral resource(s), and there would be no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan, or other land use plan would result from project implementation. The proposed project would not result in a loss of a known mineral resource; thus, it would not contribute to the cumulative loss of a mineral resource. Impacts would be less than significant.

XIII. NOISE -- Would the project result in:

- 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?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: The project proposes the construction of new trails that would be occupied by daytime hikers, walkers, and horseback riders. The project does not propose permanent noise-generating features and noise from visitors would be similar to existing conditions. The trails would be passive uses and would not be open to motor vehicles. The only noise from the trails would generally be from the conversations of trail users,

which would generate very low levels of noise. Given the low noise levels of trail users, operational noise from on-site activities would not increase existing ambient noise levels. Because implementation of the project is not expected to generate additional vehicular trips (RICK Engineering 2020), noise contributions to nearby roadways would be negligible. Operation of the project's trails would therefore not generate direct noise impacts on existing or planned noise-sensitive land uses.

Temporary or periodic increases in ambient noise levels associated with the project would be limited to noise from construction activity. General construction noise would comply with the construction noise limits of the County of San Diego Noise Ordinance (Section 36.409), defined as an excess of 75 A-weighted decibels (dBA) for more than 8 hours during a 24-hour period.

Temporary construction noise increases may exceed 60 dBA L_{EQ} (one hour) during a single hour. Construction may occur during the breeding season for least Bell's vireo (March 15 to September 15), coastal California gnatcatcher (March 1 to August 15), or the general avian breeding season (February 15 to August 31). If construction occurs during these periods, noise from noise-generating equipment such as excavators, dozers, or backhoes would potentially exceed 60 dBA L_{EQ} (one hour), and impacts would be potentially significant. Mitigation measure **MM-BIO-7** would require a pre-construction survey for active nests within the potential impact areas for each species and the potential installation of noise-attenuation materials to reduce noise levels to below 60 dBA L_{EQ} . Upon implementation of mitigation measure **MM-BIO-7**, impacts to nesting bird species due to construction noise would be less than significant.

The project would not result in cumulative noise impacts because no cumulative projects were identified within the vicinity of the project. Refer to XXI, Mandatory Findings of Significance, for further discussion.

b) Generation of excessive ground borne vibration or ground borne noise levels?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: Construction of the project would not involve equipment or activities that would generate elevated vibration levels or ground borne noise levels such as a vibratory roller or pile driving, and the public's use of the trail would not result in excessive ground borne vibration or ground borne noise levels.

Additionally, the project does not propose major, new or expanded infrastructure such as mass transit, highways or major roadways, or intensive extractive industry that could generate excessive operational ground borne vibration or ground borne noise levels on site or in the surrounding area.

Therefore, the project would not generate excessive ground borne vibration or ground borne noise levels on a project or cumulative level.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Gillespie Field is located approximately 5 miles northwest of the project site. According to the Gillespie Field ALUCP, the 60 dBA Community Noise Equivalent Level (CNEL) noise exposure contours for the flight operations does not extend into the project site (ALUC 2010). Therefore, the project would not expose people residing or working in the project area to excessive airport related noise levels.

There are no new or expanded public airports projects in the vicinity that may extend the boundaries of the 60 dBA CNEL noise contour. Therefore, the project would not expose people residing or working in the project area to excessive airport-related noise on a project or cumulative level.

XIV. POPULATION AND HOUSING -- Would the project:

- 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)?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed project would not induce substantial population growth because it does not propose a physical or regulatory change that would remove a restriction to or encourage population growth in an area including, but limited to, the following: new or extended infrastructure or public facilities that would serve additional development; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes such as General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations, or Local Agency Formation Commission (LAFCO) annexation actions. Therefore, the proposed project would not induce substantial unplanned population growth in the project area, nor would it result in cumulative impacts related to unplanned population growth when considered in combination with the cumulative projects in the area.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: No existing housing occurs within the proposed alignment and the project would not displace any existing people or housing. Therefore, no impact to existing people or housing would occur.

XV. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: The proposed project involves the construction of a new governmental facility, which consists of several trail segments to connect two existing public regional trails. The construction of the proposed project is not necessary to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services. The project is being conducted to provide greater regional trail connectivity and additional recreational facilities for the existing and planned population. Because the project is not growth-accommodating, new or physically altered government facilities, including fire stations, police stations, schools, other park facilities, or other public facilities, would not be required. This Initial Study outlines the potential environmental impacts resulting from the proposed project. The new facilities would not result in a substantial adverse physical impact because all related impacts from the proposed recreation facilities have been mitigated to below a level of significance. Mitigation incorporated into this Initial Study include **MM-BIO-1** through **MM-BIO-32**, which would mitigate impacts on biological resources to below

a significant level and **MM-CUL-1** through **MM-CUL-3**, which would reduce impacts on historical resources, archaeological resources, and tribal cultural resources. Refer to sections IV. *Biological Resources*, V. *Cultural Resources*, and XVIII. *Tribal Cultural Resources*, for more information. This proposed project, in combination with cumulative projects in the vicinity, would not contribute to more demand on public services, and would not have the potential for cumulatively considerable adverse physical effects on the environment.

XVI. RECREATION

- 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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project would likely result in additional use to two existing public regional trails, the Sweetwater River Loop Trail and the California Riding and Hiking Trail. Additional use along these trails is not anticipated to result in substantial deterioration or acceleration, and the increase in use would not result in significant impacts. The project does not propose residential use, including, but not limited to, a residential subdivision, mobile home park, or construction for a single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. According to the project's Traffic Impact Study, the project would not result in additional vehicular traffic and the project has been designed so that use of the trail would not result in substantial physical deterioration of the trail (RICK Engineering 2020, Appendix E). Therefore, the proposed project would not result in direct or cumulative impacts on recreational facilities.

- 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?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: The project involves the development of multi-use trails to improve regional trail connectivity, with associated potential impacts addressed throughout this document. As outlined in this Initial Study, the project would not result in adverse physical effect on the environment because all related impacts from the proposed recreation facilities would be mitigated to a level below significance.

XVII. TRANSPORTATION -- Would the project:

- a) Conflict with a program plan, ordinance or policy addressing the performance of the circulation system, including transit, roadway, bicycle and pedestrian facilities?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less Than Significant Impact: The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards and Mobility Element, the County of San Diego Transportation Impact Fee Program, and the Congestion Management Program.

The project would not conflict with a program plan, ordinance, or policy addressing the performance of the circulation system. The project would require crosswalks at multiple locations along Dehesa Road and Sloane Canyon Road, and the project would require shared use of County ROW. All crosswalks and shared access with existing County ROW would be designed to County transportation standards regarding signage, traffic separation, and visibility, and would therefore not conflict with existing County guidelines. Furthermore, the project would support improved regional bicycle and pedestrian movement and would not significantly increase vehicular trips or delays (RICK Engineering 2020). Therefore, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian, or bicycle facilities, and traffic-related impacts would be less than significant.

- b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less than Significant Impact: CEQA Guidelines Section 15064.3, Subdivision (b) describes specific considerations for evaluating a project's transportation impacts. This section provides specific criteria for determining significance of transportation impacts, including guidelines for evaluating land use projects and transportation projects, for performing a qualitative analysis, and for choosing an appropriate methodology. The proposed project would not result in an increase in the number of vehicle trips, volume-to-capacity ratio on roads, or congestion at intersections in relation to existing conditions (RICK Engineering 2020). Since the proposed project would not result in transportation impacts, it would not conflict with the guidelines provided in CEQA Guidelines Section 15064.3, Subdivision (b). Impacts would be less than significant.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project would provide trails to remove potentially incompatible uses (e.g., horses) from unprotected use within existing roadways. The project's preferred alignment would require crosswalks along Sloane Canyon Road for implementation of Segment 1 and 2a. If Segment 6b is chosen as a preferred alignment, it would require a crosswalk and signal at the intersection of Dehesa Road and Sloane Canyon Road or a crosswalk at a point approximately 800 feet east of the intersection of Dehesa Road and Sycuan Summit Drive to reduce potential conflicts between trail users and existing vehicular traffic. Segments 2a, 2b, and 2c would require the narrowing of Sloane Canyon Road, including the Northern Bridge and Southern Bridge, for trail use. These roadway designs, including proposed trail crossings near the off-site staging area and near the Southern Bridge would be required to adhere to County transportation guidelines to reduce potential hazards. Furthermore, the project would construct Segments 4a and 5a entirely within County ROW and portions of Segments 6a, 6b, 2a, 2b, and 2c would be within or adjacent to County ROW, including along roadways and along bridges. Because the final project alignments and designs are not available for each Segment, the project's ability to reduce hazards due to geometric design features or incompatible uses cannot be determined at this time.

Prior to construction of each trail segment, the final design shall be reviewed and approved by the County of San Diego Department of Public Works. Approval shall be determined based on the project's compliance with County transportation standards for all project crossings and shared usage with County ROW. These standards include, but are not limited to, signage, traffic separation, and visibility.

These guidelines and standards ensure safety for trail users and motorized vehicles when sharing County ROW. Upon confirmation of the project's compliance with transportation standards and approval by County staff, impacts would be less than significant. The project would not contribute to a cumulatively considerable impact because past, present, and future projects are required to comply with transportation standards.

d) Result in inadequate emergency access?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The proposed project would not close roads or access points for the project site. The project would result in the narrowing of Sloane Canyon Road, including

along the existing Northern Bridge and existing Southern Bridge; however, this will not result in inadequate emergency access because the roadway would be designed to accommodate emergency vehicles. The project would not include residences or institutions that would attract large numbers of people to the area. The trails would provide a way for emergency services to access areas that may otherwise be difficult to access. Furthermore, the project would not interfere with the Operational Area Emergency Plan, Multi-Jurisdictional Hazard Mitigation Plan, or Dam Evacuation Plan. No impact to emergency access would occur.

XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or 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 §5020.1(k), or
- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact. Tribal Cultural Resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the CRHR or included in a local register of historical resources, as defined in subdivision (k) of Public Resources Code Section 5020.1.

The County initiated Assembly Bill (AB)-52 consultation with registered tribes, which occurred between October 17, 2019 and February 5, 2020. Three tribes (Sycuan Band of the Kumeyaay Nation [Sycuan], Lipay Nation of Santa Ysabel, and Viejas Band of Kumeyaay Indians) requested consultation. While all tribes asserted that the area was culturally sensitive, no Tribal Cultural Resources within the study area were identified.

The project has been designed to avoid culturally sensitive areas, such as routing the trail around all identified bedrock milling features in Segment 1 and Segment 6b. In addition, a HPTP and monitoring plan would be developed prior to project construction to ensure appropriate treatment of the cultural resources that would be affected by the project. Mitigation measures MM-CUL-1 through MM-CUL-3 will be required for all segments of the proposed trail construction. Therefore, the project would not impact a Tribal Cultural resource as defined in subdivision (k) of Public Resources Code Section 5020.1

- 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 §5024.1. In applying the criteria set forth in subdivision (c) of Public

Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact. AB-52 consultation with appropriate tribes was initiated between the County and each tribal contact, which occurred between October 17, 2019 and February 5, 2020. These tribes included the Barona Band of Mission Indians, Campo Band of Mission Indians, Lipay Nation of Santa Ysabel, Jamul Indian Village, Kwaaymii Laguna Band, Manzanita Band of Kumeyaay Nation, Sycuan, and Viejas Band of Kumeyaay Indians.

Three tribes (Sycuan, Lipay Nation of Santa Ysabel, and Viejas Band of Kumeyaay Indians) requested AB-52 consultation, and while all tribes asserted that the area was culturally sensitive, no Tribal Cultural Resources within the study area were identified by any of the tribes. A California Historical Resources Information System file search and cultural survey identified significant archaeological resources, as described in section V, Cultural Resources. In addition, the NAHC indicated that the results of the Sacred Lands File search were positive for the Study Area.

XIX. UTILITIES AND SERVICE SYSTEMS -- Would the project:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact. The proposed project includes the construction of a series of multi-use trail segments to connect two existing regional trails. The project would require the use of minimal water during construction and would not require water during operations. Therefore, no impact would occur.

- a) 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?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project does not propose permanent restroom facilities. Portable restroom facilities would be provided for workers during construction of the proposed project. Wastewater generated at the portable restroom facilities would be minimal and not be disposed of at the project site, but would be hauled away, and disposed of at an appropriate facility in accordance with applicable regulations. Therefore, the project would not interfere with a wastewater treatment provider's service capacity.

- b) 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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: Implementation of the proposed project would generate minimal solid waste associated with trail use (e.g. litter). All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are five permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs.

- c) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: Implementation of the project would generate minimal solid waste during construction. Disposal of construction-related waste materials would be legally disposed of at regulated disposal sites. No refuse bins would be provided, and operational waste would be carried out for legal disposal, similar to existing conditions on nearby regional trails. Signage would be installed to inform trail users of trail rules, including for solid waste.

XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: As discussed in Section IX.e, the proposed project would not conflict with the Operational Area Emergency Plan, the Multi-Jurisdictional Hazard Mitigation Plan, the San Diego County Nuclear Power Station Emergency Response Plan, the Oil Spill Contingency Element, the Emergency Water Contingencies Annex and Energy Shortage Response Plan, or the Dam Evacuation Plan for the County of San Diego. The proposed project also would not conflict with the Crest Community Wildfire Protection Plan, which identifies areas of potential risk and provides hazard reduction priorities. The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. The proposed project would not contribute to a cumulatively considerable impact because future projects are required to comply with the County Codes and emergency evacuation plans. Potential impacts related to conflict with an adopted emergency response or emergency evacuation plan would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project area is located within a Very High Fire Hazard Severity Zone as designated by CAL FIRE in their *San Diego County Very High Fire Hazard Severity Zones in LRA* (CAL FIRE 2009). The climate and vegetation make the area suitable for potential wildland fires; Sloane Canyon and nearby areas burned during wildland fire events in the past, including the 1970 Mount Laguna Fire, the 2003 Cedar Fire, and two smaller fires in 2019.

The proposed project would construct multi-use, unpaved trails for non-motorized recreational use. Although some trails may be located in areas where previously there were none, the proposed project would not change the overall uses or conditions of the area, or introduce new conditions to the project site that would exacerbate the existing high fire threat. The County would post and enforce park rules in accordance with the San Diego County Code of Regulatory Ordinances, Title 4 Public Property, Division 1. Parks and Recreation, Chapter 1. These

regulations include, but are not limited to the prohibition of smoking, campfires, and open flames and the prohibition of fireworks, firearms, weapons, air guns, archery devices, slingshots, or explosives of any kind across, in or into a County park facility. These park regulations would reduce the risk of wildfire within the project.

The elements of the proposed project would not add features to the project site that would exacerbate wildfire risks. The proposed trails would be closed to the public during a fire event and would not result in the exposure of visitors to an increased risk of exposure to pollutant concentrations from a wildfire or an uncontrolled wildfire. Impacts would be less than significant.

- 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?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less than Significant Impact: The proposed project would not include installation of new infrastructure that may exacerbate fire risk. The proposed project would not include fire prevention or suppression infrastructure, such as fire breaks, that would result in impacts on the environment. Routine maintenance would be required for upkeep of the trails, including proposed puncheons and bridges. Maintenance activities include brush removal along the edges of the trail, which would reduce potential fire risks. Furthermore, maintenance activities would be similar to those already conducted on adjacent roadways. Therefore, the proposed project would not include activities related to infrastructure that would result in direct or cumulatively considerable impacts on the environment.

- 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?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less Than Significant Impact: The proposed project site is located in a climate and topography that is prone to wildfires and has natural habitats of vegetation that could be a fuel source for wildfires, especially during droughts or dry periods. Wildfire risk tends to be high in locations where dense vegetation occurs on a steep slope. Post-wildfire risks associated with slopes, including mudflow or landslides, could occur when the vegetation that anchors soils to the hillside has burned, increasing the potential for mudflow or landslide in the event of heavy rains (CAL FIRE 2018). The proposed project site is at risk for this situation to occur; however, the proposed project does not include features that would alter or exacerbate these existing conditions on the

project site. While a portion of the Segment 2a, 2b, 2c, 4a, and 4b trails may require hillslope grading during construction, such activities would be conducted in accordance with the recommendations of the project geotechnical report and future segment-specific reports to ensure slope stability after construction. Furthermore, the County would implement standard safety practices, and would close the trails if safety risks associated with mudflows, landslides, or other post-fire hazards are identified. Therefore, the proposed project would not expose more people to the risk of post-wildfire hazards, including mudflow, landslide, or other forms of slope instability from existing conditions.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

- 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?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated. Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV,V, and XVIII of this form. In addition to project-specific impacts, this evaluation considered the project's potential for significant cumulative effects. Resources that have been evaluated as significant would be potentially impacted by the project, particularly biological resources, cultural resources, and tribal cultural resources. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes mitigation measures **MM-BIO-1** through **MM-BIO-32** to reduce potential impacts on sensitive species; **MM-CUL-1** and **MM-CUL-2** to avoid potential impacts on historic or buried cultural resources; and **MM-CUL-3** to protect human remains. As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Past, present and future projects were compiled to assess impacts by the project in conjunction with cumulative projects in the vicinity. However, no cumulative projects that would have adverse effects on the environment were found within one mile of the project.

Less Than Significant Impact. Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in sections I through XX of this form. In addition to project specific impacts, this evaluation considered the project’s potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact. In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts on human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VII. Geology and Soils, VIII. Greenhouse Gas, IX. Hazards and Hazardous Materials, X Hydrology and Water Quality XIII. Noise, XIV. Population and Housing, XVII. Transportation, and XX. Wildfire. As a result of this evaluation, there is no substantial evidence of adverse effects to human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

XX. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State and local regulation are available on the Internet. For Federal regulation refer to <http://www4.law.cornell.edu/uscode/>. For State regulation refer to www.leginfo.ca.gov. For County regulation refer to www.amlegal.com. All other references are available upon request.

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