

PUBLIC REVIEW DRAFT

OTAY WATER DISTRICT TRESTLE BRIDGE DEMOLITION PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

PREPARED FOR:

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Acronyms and Abbreviations

Arid West Supplement	Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region
BTR	Biological Resources Technical Report
CAAs	Clean Air Acts
CAP	Climate Action Plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH ₄	methane
CO	carbon monoxide
CO ₂	carbon dioxide
District's	Otay Water District
DPM	Diesel Particulate Matter
EIR	Environmental Impact Report
FAA	Federal Aviation Administration
GHG	greenhouse gas
IS	Initial Study
MND	Mitigated Negative Declaration
MSCP	Multiple Species Conservation Program
MSL	mean sea level
N ₂ O	nitrous oxide
NO _x	nitrogen oxide
O ₃	ozone
OHWM	Ordinary High Water Mark
OPR	Office of Planning and Research
PM ₁₀ and PM _{2.5}	particulate matter less than 10 or 2.5 microns in diameter
PRC	Public Resources Code
PRMMP	Paleontological Resources Monitoring and Mitigation Plan
RAQS	Regional Air Quality Strategy
ROG	reactive organic gas
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SIP	State Implementation Plan
SO _x	sulfur oxide
SR	State Route
TSG	Transportation Study Guidelines

USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VHFHSZ	Very High Fire Hazard Severity Zones
VMT	Vehicle Miles Traveled

1.1 Purpose

This Initial Study Checklist/Mitigated Negative Declaration (IS/MND) has been prepared for the proposed project in accordance with the California Environmental Quality Act (CEQA), California Public Resources Code (PRC) Sections 21000 et seq., and associated State CEQA Guidelines, California Code of Regulations (CCR) Title 14, Sections 15000 et seq. This IS/MND Checklist includes a description of the proposed project and surrounding land uses, and an evaluation of the potential environmental impacts of the project.

The District is the lead agency for the project and would have the principal responsibility for approving the project. The District is the project Applicant and is proposing the project that is analyzed in this IS/MND.

1.2 Summary of Findings

Chapter 3, *Environmental Checklist*, discusses the potential environmental impacts of the proposed project and the recommended mitigation program, including mitigation measures that would reduce all potential impacts to levels considered less than significant. According to Section 15370 of the State CEQA Guidelines, *mitigation* includes the following:

(a) avoiding the impact altogether by not taking a certain action or parts of an action; (b) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (c) rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (d) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and (e) compensating for the impact by replacing or providing substitute resources or environments.

Implementation of the proposed project would result in potentially significant impacts on biological resources, cultural resources, and geology, soils and paleontology, prior to implementation of mitigation measures. Implementation of the mitigation measures, as detailed in each environmental analysis presented in Chapter 3, would reduce all potentially significant impacts to a less-than-significant level.

1.3 Outline of Initial Study Checklist

This IS/MND is organized as follows.

- Chapter 1, *Introduction*, provides an overview of the IS Checklist process.
- Chapter 2, *Project Description*, identifies the project location, describes the environmental setting of the project site and vicinity, and discusses the details of the proposed project.
- Section 3, *Environmental Checklist*, analyzes the potential environmental impacts of the proposed project, and includes the following for each of the resource topics:

- Environmental setting and in-depth analysis of identified environmental impacts.
- Mitigation measures that would reduce potential significant impacts to less-than-significant levels.

2.1 Project Overview

The proposed project consists of the demolition of a steel trestle and removal of an abandoned 24-inch water pipeline in the Otay Mesa area. The pipeline was replaced by the Central Area and Otay Mesa Interconnection Pipeline in 2001. The trestle also carries an abandoned high-pressure gas line that supplied the 870-1 Pump Station which had prevented the trestle from being demolished previously. SDG&E abandoned this gas line in 2017 and replaced it with a feed from the south. The existing water pipeline is no longer in service and the District intends to remove the trestle and pipeline to address liability concerns.

2.2 Project Location and Surrounding Land Uses

The proposed project's location in relationship to the surrounding San Diego region is depicted on Figure 2-1. The proposed project is in the unincorporated community of Otay Mesa, San Diego County. The site is situated approximately 0.5 mile south of the Lower Otay Lake, northwest of the George F. Bailey Detention Facility, and north of the OWD 571-1 (Roll) Reservoir. The site is within the Otay Mesa U.S. Geological Survey (USGS) 7.5-minute quadrangle map (Figure 2-2).

The proposed project site is about 15 miles southeast of downtown San Diego. Regional access is provided by State Route (SR)-125 which is approximately 2 miles west of the project site. Dirt roads provide local access.

2.3 Project Description

The proposed project consists of the demolition of a steel trestle and removal of an abandoned 24-inch water pipeline in the Otay Mesa area. The pipeline was replaced by the Central Area and Otay Mesa Interconnection Pipeline in 2001. The trestle also carries an abandoned high-pressure gas line that supplied the 870-1 Pump Station, which had prevented the trestle from being demolished previously. San Diego Gas & Electric (SDG&E) abandoned this gas line in 2017 and replaced it with a feed from the south. Since the existing water pipeline is no longer in service, the District intends to remove the trestle and pipeline to address liability concerns.

The total length of the pipeline and bridge to be removed is approximately 400 linear feet. The bridge portion over the river is suspended about 40–50 feet above the riverbed and is approximately 170 linear feet of the total length.

Demolition of the trestle bridge and water line is anticipated to occur over a 4-month period. Any construction activities would occur only during the permitted daytime hours of 7:00 a.m. to 7:00 p.m. as specified by the County of San Diego municipal code (Section 36.408). Construction of the proposed project would occur in one phase and include the following activities:

- Mobilize to site/improve access roads
- Cap utilities
- Demolish water line and trestle bridge
- Removal of material from the site

South of the trestle bridge, approximately 900 feet of access road would be improved and widened to 12 feet, for an area of 10,800 square feet (0.25 acre). The first 80 feet of the road would need to be realigned to meet construction vehicle requirements, necessitating clearing and grading work for this segment. North of the trestle bridge, most of the existing roads would be wide enough to accommodate construction equipment. However, approximately 200 feet from the end of the road to the exposed piping would need to be widened to 10 feet, for an area of 2,000 square feet.

The work area at the bridge site on the northern and southern sides of the trestle would be approximately 0.25 acre. This acreage does not include staging areas. Three staging areas would be required, one on the northern side of the bridge and two on the southern side, for a total of 0.15 acre. Staging areas would consist of land that is already disturbed.

Equipment for construction would include a 90-ton crane, a Bobcat skid-steer loader, dump trucks, and a backhoe or excavator (Caterpillar 345C L Hydraulic Excavator or smaller) for demolition and earthwork to prepare the project site.

2.4 Construction

Demolition of the trestle bridge and water line is anticipated to occur over a 4-month period. Any construction activities would occur only during the permitted daytime hours of 7:00 a.m. to 7:00 p.m. as specified by the County of San Diego municipal code (Section 36.408). Construction of the proposed project would occur in one phase and would include the following activities:

- Mobilize to site/Improve access roads
- Cap utilities
- Demolish water line and trestle bridge

South of the trestle bridge, approximately 900 feet of access road would be improved and widened to 12 feet, for an area of 10,800 sq ft (0.25 acre). The first 80 feet of the road would need to be realigned to meet construction vehicle requirements, necessitating clearing and grading work for this segment. North of the trestle bridge, most of the existing roads would be wide enough to accommodate construction equipment. However, approximately 200 feet from the end of the road to the exposed piping would need to be widened to 10 feet, for an area of 2,000 sq ft (Figure 2-5).

The work area at the bridge site on the north and south sides of the trestle would be approximately 0.25 acre. This acreage does not include staging areas. Three staging areas would be required, one on the north side of the bridge and two on the south side, for a total of 0.15 acre. Staging areas would consist of land that is already disturbed and clear of vegetation (Figure 2-5).

Equipment for construction would include a 90-ton crane, a Bobcat skid-steer loader, dump trucks, and a backhoe or excavator (Caterpillar 345C L Hydraulic Excavator or smaller) for demolition and earthwork to prepare the project site.

It is anticipated that construction would begin in mid-September 2023 and continue over a 4-month period, ending in mid-January 2024.

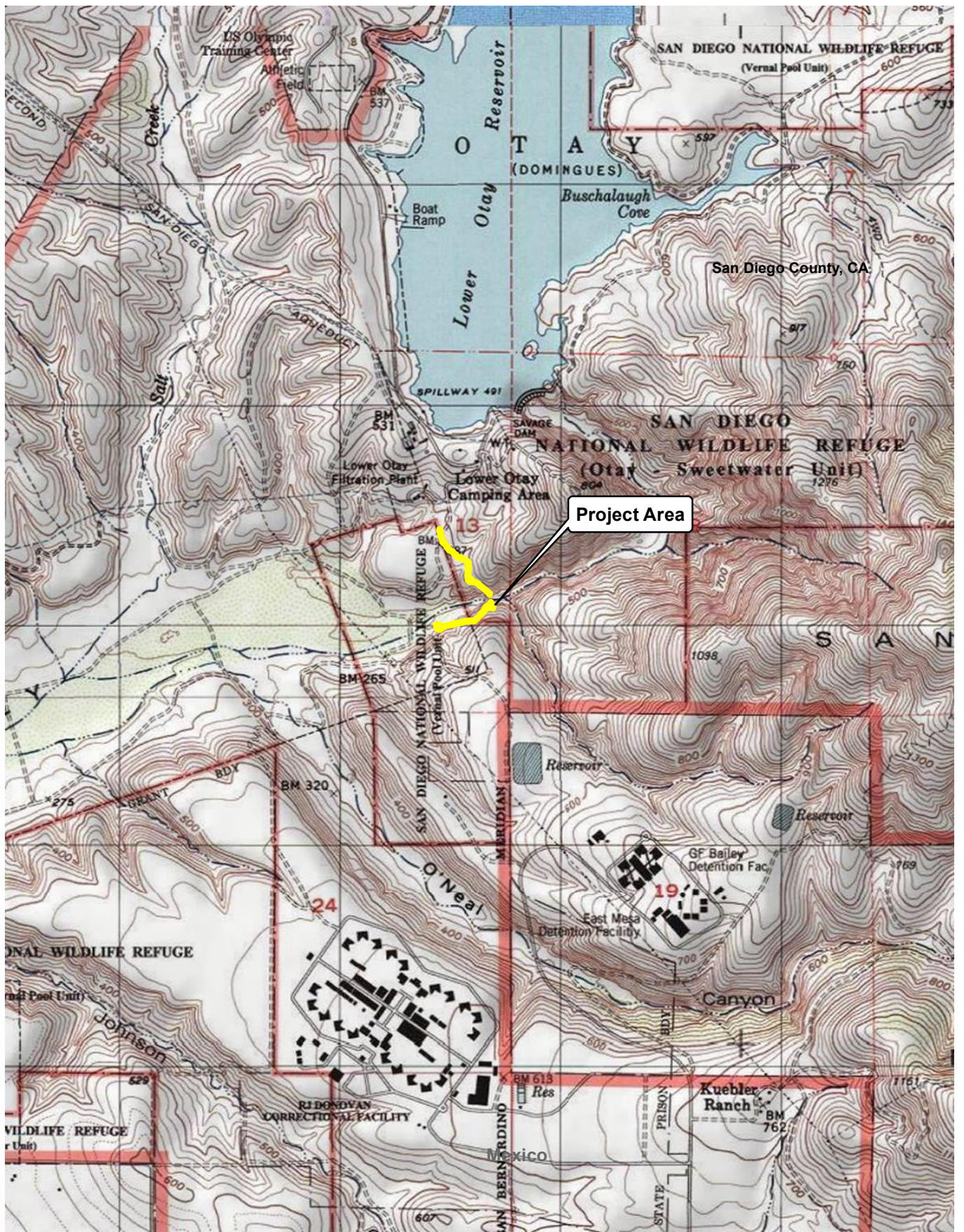
2.5 Operation

The proposed project would remove a trestle bridge and abandoned water line. Upon completion of the proposed project, the proposed project area would consist of vacant land. There would be no activities associated with an operational phase.



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Miles
1:250,000
Source: USGS-ESRI Imagery, 2019

**Figure 2-1
Regional Vicinity**



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Feet

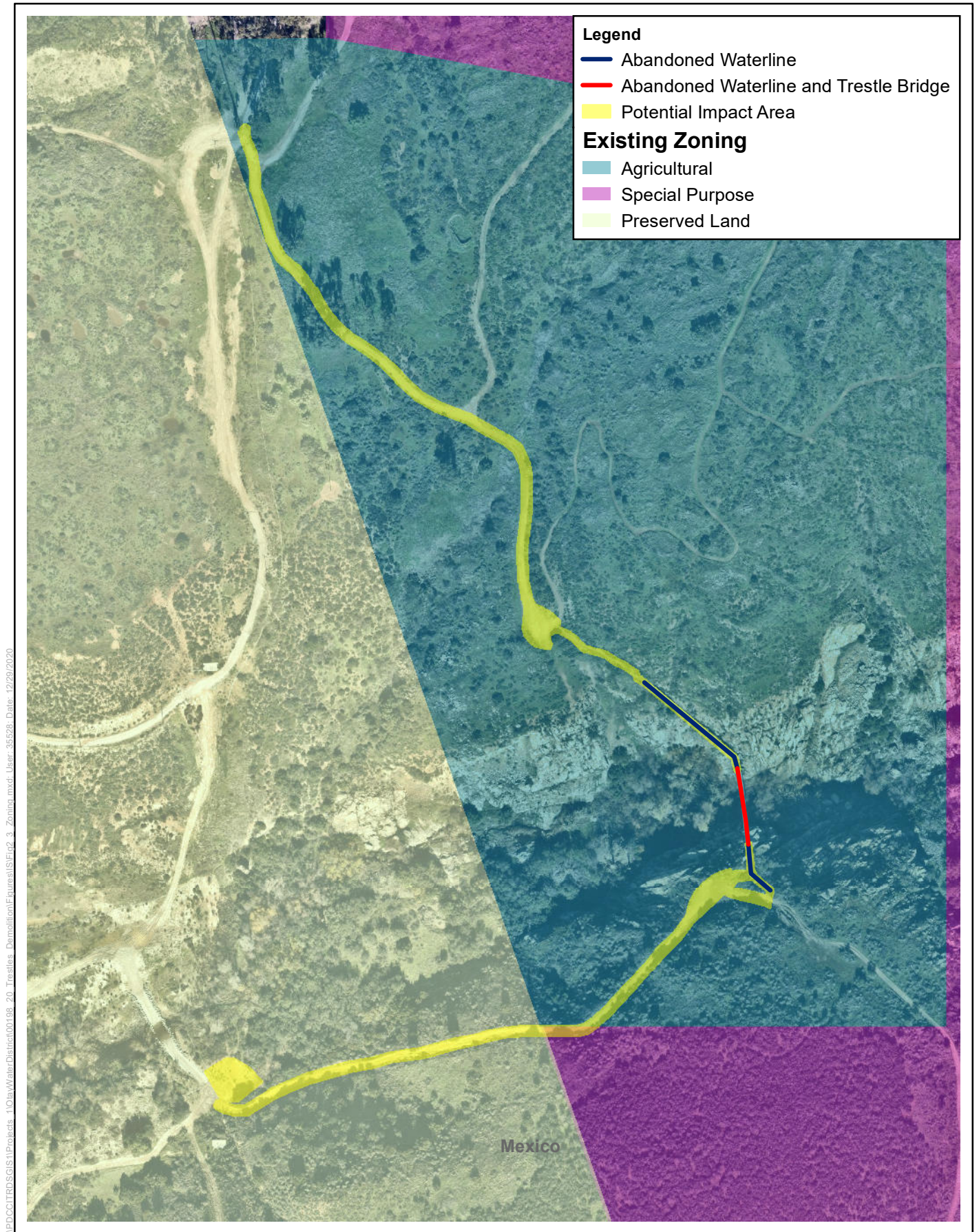
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Source: USGS-ESRI Imagery, 2019

Legend

Project Area

Figure 2-2
Project Location



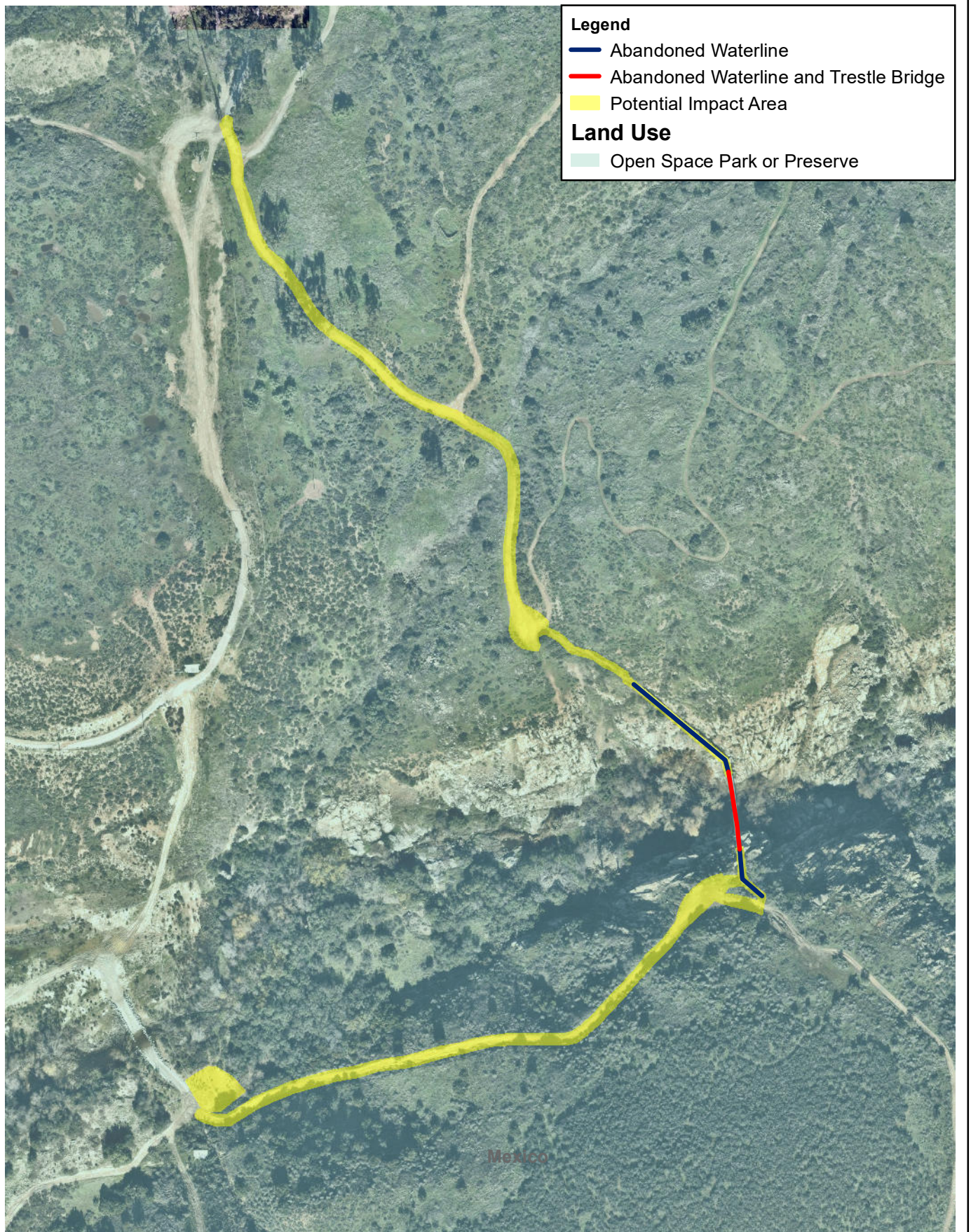
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Feet
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Source: USGS-ESRI Imagery, 2019

Figure 2-3
Existing Zoning

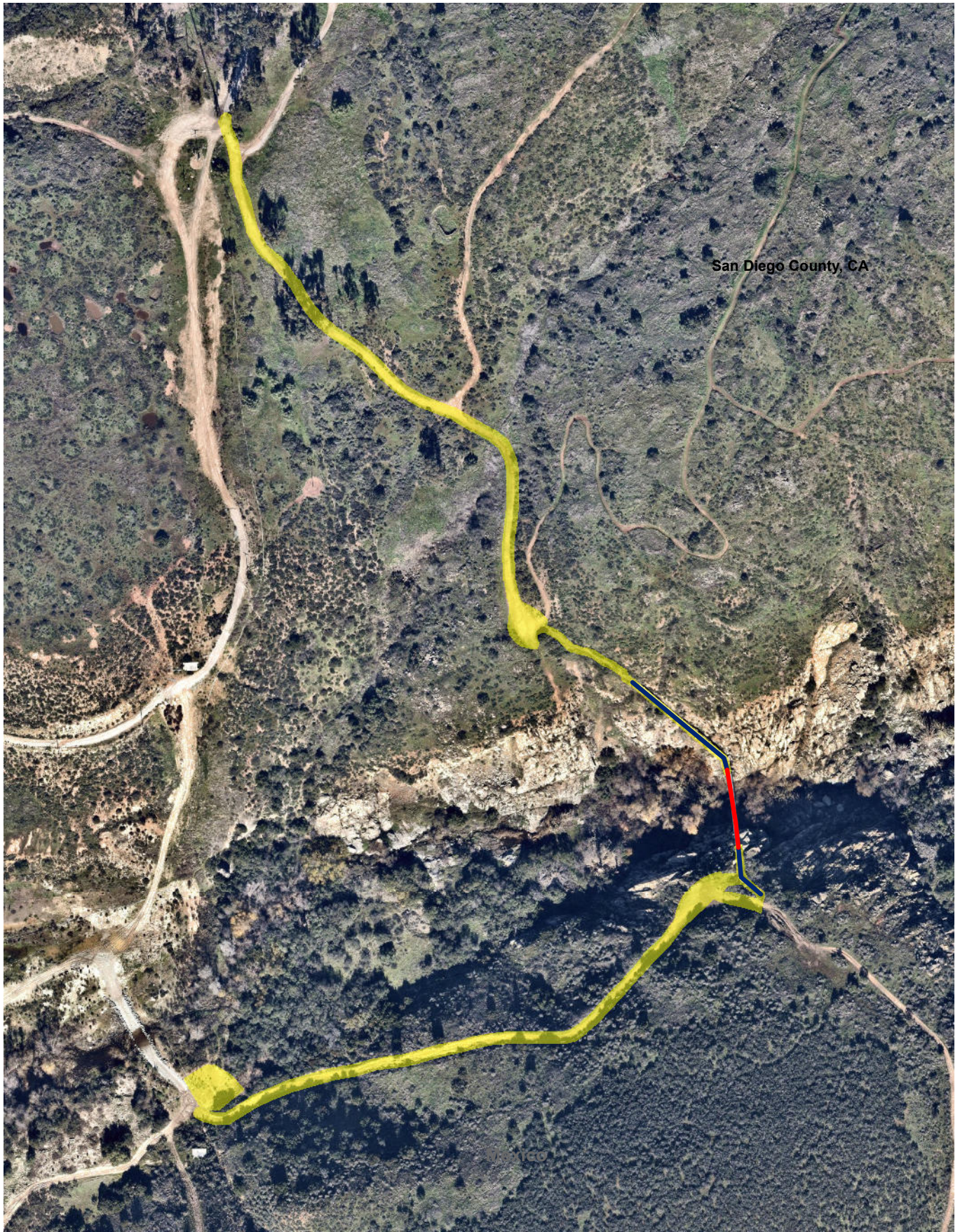
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Source: USGS-ESRI Imagery, 2019

Figure 2-4
Existing Land Use

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Source: USGS-ESRI Imagery, 2019

Legend

- Abandoned Waterline
- Abandoned Waterline and Trestle Bridge
- Access and Staging

**Figure 2-5
Site Plan**

2.6 Mitigation Monitoring and Reporting Program

The Initial Study Checklist determined that the proposed project may have potentially significant environmental impacts; however, mitigation measures (MMs) have been incorporated into the project to reduce these impacts to a less-than-significant level. This IS/MND has been prepared in accordance with Section 15070 of the California Environmental Quality Act (CEQA) Guidelines.

Avoidance and Minimization Measures (AMMs) **AMM-BIO-1**, **AMM-BIO-2**, and **AMM-BIO-3**, as well as mitigation measures **MM CUL-1**, **MM CUL-2**, **MM CUL-3**, and **MM GEO-1** will be implemented to avoid or reduce the proposed project's potentially significant impacts on biological resources, cultural resources, and paleontological resources, respectively:

Avoidance and Minimization Measures

AMM-BIO-1: Biological Preconstruction Survey. Due to the presence of Quino checkerspot butterfly (QCB) host plants and rare plants in the potential impact area, the shoulders of the dirt roads and proposed off-road traverses will be inspected for presence of QCB host plants within 7 days prior to construction. QCB host plants known from the site include dot-seed plantain, purple owl's clover, and purple Chinese houses. Populations of host plants mapped in March 2022 and any newly observed host plants present along road shoulders shall be flagged for avoidance with staking and flagging. If any host plants are present within the proposed off-road travel paths, then the population shall be flagged and shall be avoided; no machinery shall drive over host plant locations at any time of year.

AMM-BIO-2: Biological Monitoring. Due to the presence of Quino checkerspot butterfly (QCB) and its host plants, California gnatcatcher, and sensitive plants in the vicinity of the site, a biological monitor will be onsite full-time during project activities. The Biological Monitor will ensure that equipment is constrained to existing disturbed road and pads to the maximum extent practicable and will avoid flagged sensitive resources. The Biologist will sweep ahead of equipment to ensure that no sensitive reptiles or mammals are affected by vehicle movements. The biologist will ensure that project activities do not affect any QCB host plants, Tecate cypress, singlewhorl burrobush, San Diego barrel cactus, or San Diego goldenstar.

AMM-BIO-3: Project Timing. Sensitive neotropical migrant bird species utilize riparian habitat around the project during the summer, and sensitive resident bird species will breed in the surrounding open space during the breeding season. Quino checkerspot butterfly (QCB) have potential to fly from late February to early May. To avoid any potential impacts on federally listed QCB and listed and sensitive bird species, all work will be conducted within the period of September 15 to February 15.

Mitigation Measures

MM-CUL-1: Survey Additional Project Area if Project Boundary Changes. If the boundary of the project area were to change during project design or implementation, any additional areas that were not previously surveyed during the initial project pedestrian survey and evaluation shall be surveyed by a qualified archaeologist.

MM-CUL-2: Archaeologist and Native American Monitoring during Grading Activities. Prior to grading, OWD shall retain a qualified archaeologist to monitor all ground-disturbing

activities in coordination with a Native American monitor (as applicable). Prior to beginning any work that requires cultural resources monitoring:

- i. A preconstruction meeting shall be held that includes the archaeologist, construction supervisor and/or grading contractor, and other appropriate personnel to go over the cultural resources monitoring program.
- ii. The archaeologist shall (at that meeting or subsequently) submit to the OWD a copy of the site/grading plan that identifies areas to be monitored.
- iii. The archaeologist shall coordinate with the construction supervisor and OWD on the construction schedule to identify when and where monitoring is to begin, including the start date for monitoring.
- iv. The archaeologist shall be present during grading/excavation and shall document such activity on a standardized form. A record of monitoring activity shall be submitted to OWD each month and at the end of monitoring.

MM-CUL-3: Resource Management. In the event archaeological resources are discovered during ground-disturbing activities, the on-site construction supervisor shall be notified and shall redirect work away from the location of the discovery to allow for preliminary evaluation of potentially significant archaeological resources. The OWD shall consult with the archaeologist to consider means of avoiding or reducing ground disturbance within the archaeological site boundaries, including minor modifications of project footprints, placement of protective fill, establishment of a preservation easement, or other means. If development cannot avoid ground disturbance within the archaeological site boundaries, then OWD shall implement the measures listed below. The construction supervisor shall be notified by the archaeologist when the discovered resources have been collected and removed from the site, at which time the construction supervisor shall direct work to continue in the location of the discovery.

- i. Prepare a research design, resource evaluation plan and, if necessary, an archaeological data recovery plan that will capture those categories of data for which the site is significant. The significance of the discovered resources shall be determined in consultation with the Native American representative, as appropriate. All archaeological work shall be conducted in the presence of a Native American monitor.
- ii. If, in the opinion of the qualified archaeologist and in light of the data available, the significance of the site is such that data recovery cannot capture the values that qualify the site for inclusion in the CRHR, then OWD shall reconsider project plans in light of the high value of the resource, and implement more substantial project modifications that would allow the site to be preserved intact, such as redesign, placement of fill, or relocation or abandonment.
- iii. Perform appropriate technical analyses, prepare a report and file it with the SCIC, and provide for the permanent curation of recovered resources, as follows:
 - a. The archaeologist shall ensure that all significant cultural resources collected are cleaned, catalogued, and analyzed to identify function and chronology as they relate to the history of the area; that faunal

material is identified as to species; that specialty studies are completed, as appropriate; and that a letter of acceptance from the curation institution has been submitted to OWD.

- b. Curation of artifacts shall be completed in consultation with the Native American representative, as applicable.

MM GEO-1: If it is determined that excavation would extend below the artificial fill, a qualified paleontologist shall be retained by the project proponent prior to excavations reaching 10 feet in depth or greater. The qualified paleontologist shall develop and execute a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) and supervise a paleontological monitor who shall monitor all ground-disturbing activities associated with such excavations. The PRMMP would outline the procedures to follow with respect to paleontological resources (e.g. monitoring protocols, curation, data recovery of fossils, reporting). If fossils are found during such excavation, the paleontological monitor shall be authorized to halt ground-disturbing activities within 25 feet of the find in order to allow evaluation of the find and determination of appropriate treatment according to the PRMMP.

Chapter 3

Environmental Checklist

1. **Project Title:** Otay Water District Trestle Bridge Demolition Project
2. **Lead Agency Name and Address:** Otay Water District
2554 Sweetwater Springs Boulevard
Spring Valley, CA 91978
3. **Contact Person and Phone Number:** Ms. Lisa Coburn-Boyd, (619) 670-2219
4. **Project Location:** San Diego County, CA
5. **Project Sponsor's Name and Address:** Ms. Lisa Coburn-Boyd, 2554 Sweetwater Springs
Boulevard, Spring Valley, CA 91978
6. **General Plan Designation:** Open Space (Conservation)
7. **Zoning:** Agricultural, Special Purpose, Preserved Land
8. **Description of Project:** The proposed project consists of the demolition of a steel trestle and removal of an abandoned 24-inch water pipeline that crosses the Otay River.
9. **Surrounding Land Uses and Setting:**
Surrounding land uses primarily consist of vacant land. The proposed project site is situated approximately 0.5 mile south of the Lower Otay Lake, northwest of the George F. Bailey Detention Facility, and north of the OWD Roll Reservoir.
10. **Other Public Agencies Whose Approval is Required:**
City of Chula Vista, County of San Diego
11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?**
Consultation between OWD and Native American tribes has occurred and no requests or comments have been received.

3.1 Environmental Factors Potentially Affected

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

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology/Soils/
Paleontological Resources | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

3.2 Determination

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have an impact on the environment that is "potentially significant" or "potentially significant unless mitigated" but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards and (2) has been addressed by mitigation measures based on the earlier analysis, as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required.

Lisa Coburn-Boyd
Signature

September 1, 2022
Date

Lisa Coburn-Boyd
Printed Name

Otay Water District
For

3.3 Evaluation of Environmental Impacts

2. 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 if 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).
3. All answers must take account of the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
4. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, 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 Environmental Impact Report (EIR) is required.
5. “Negative Declaration: Less than Significant with Mitigation Incorporated” applies when the incorporation of mitigation measures has reduced an effect from a “Potentially Significant Impact” to a “Less-than-Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level. (Mitigation measures from *Earlier Analyses*, as described in #5 below, may be cross-referenced.)
6. Earlier analyses may be used if, pursuant to 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 earlier analyses 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.
7. 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, when appropriate, include a reference to the page or pages where the statement is substantiated.
8. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
9. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
10. 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 a less-than-significant level.

I. Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

No Impact. The proposed project involves the demolition of a steel trestle and removal of an abandoned 24-inch water pipeline that would no longer be visible once demolition is complete. In addition, no designated scenic vistas have been identified within the project site or vicinity. Therefore, the project would not impact a scenic vista.

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

No Impact. Officially Designated State Scenic Highways within the County of San Diego include portions of SR-52, SR-75, SR-78, and SR-163, none of which are in the vicinity of the project site (Caltrans 2019). The proposed project involves the demolition of a steel trestle and removal of an abandoned water pipeline that would no longer be visible once the demolition is complete. The project would not result in impacts to trees, rock outcroppings, or historic buildings within a state scenic highway. Therefore, no impacts to scenic resources would occur.

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?

Less than Significant Impact. Short-term visual impacts would occur during construction due to grading, demolition, and other demolition-related activities. However, the project site would be restored to its current condition following removal of the steel trestle and water pipeline. The proposed project site would be vacant following demolition. As such, no substantial visual changes are expected to occur on the project site. Therefore, impacts on the visual character or quality of the site or surrounding area would be less than significant.

d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

No Impact. The proposed project would not create a new permanent source of substantial light or glare. Therefore, no impact would occur as a result of the proposed project.

Mitigation Measures

The project is not expected to result in significant impacts on aesthetic resources. No mitigation measures are required.

II. Agricultural and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
<p>In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts on forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project, and forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

Less than Significant Impact. According to the California Department of Conservation’s 1984–2018 San Diego County Important Farmland map, the project site is identified as Nonagricultural or Natural Vegetation (California Department of Conservation 2020). The project site is currently located on vacant land with a land use designation of “Open Space Park of Preserve” and is zoned for agricultural use (County of San Diego 2011). Although the project site is zoned for agricultural uses, the proposed project would not convert farmland to nonagricultural uses. As such, implementation of the proposed project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Therefore, impacts would be less than significant.

b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?

No Impact. The Williamson Act applies to parcels consisting of at least 20 acres of Prime Farmland or at least 40 acres of land not designated as Prime Farmland. The purpose of the act is to preserve agriculture and open space lands by discouraging premature and unnecessary conversion to urban uses. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land for use as agricultural or related open space. The project site is classified as “Nonagricultural or Natural Vegetation”. In addition, the site is not under Williamson Act contract. Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and there would be no impact.

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

No Impact. The project site is not zoned as forest land or timberland. Therefore, implementation of the project would not conflict with existing zoning for such lands, and no impact would occur.

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

No Impact. The project site is not within or near forest land. Accordingly, project construction and operation would not convert forest land to non-forest use, and no impact would occur.

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

No Impact. The project would not involve changes in the existing environment which would result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, no impact would occur.

Mitigation Measures

The project is not expected to result in significant impacts on agriculture. No mitigation measures are required.

III. Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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 applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a. Conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. The project site is in the San Diego Air Basin (SDAB), which is contiguous with San Diego County. The San Diego Air Pollution Control District (SDAPCD) is required, pursuant to the federal and state Clean Air Acts (CAAs), to reduce emissions of criteria pollutants for which the county is in nonattainment. The SDAB is currently classified as a nonattainment area for the federal 8-hour ozone (O₃) standard (both the 2015 standard of 0.070 parts per million [ppm]) and the 2008 standard of 0.075 ppm. In addition, the SDAB is classified as a nonattainment area for state O₃, particulate matter less than 2.5 microns (PM_{2.5}), and particulate matter less than 10 microns (PM₁₀) standards (San Diego Air Pollution Control District 2021; California Air Resources Board 2019).

All areas designated as nonattainment are required to prepare plans showing how the area would meet the state and federal air quality standards by its attainment dates. The San Diego Regional Air Quality Strategy (RAQS) and the region's portion of the State Implementation Plan (SIP) are the region's applicable air quality plans for improving air quality in the region and attaining federal and state air quality standards. The RAQS and SIP rely on information from the California Air Resources Board (CARB) and the San Diego Association of Governments (SANDAG), including projected growth in the county, which is based in part on local general plans. Generally, projects that propose development that is consistent with the land use designations and growth anticipated by the local general plan and SANDAG would be consistent with the RAQS and SIP. The County of San Diego

General Plan is the governing land use document for physical development within Unincorporated San Diego County, where the proposed project is located.

The proposed project consists of demolition of a steel trestle and removal of an abandoned water pipeline. Project construction would be required to comply with SDAPCD Rules and Regulations, including Rules 50, 51, and 55, which forbid visible emissions, forbid nuisance activities, and require fugitive dust control measures, respectively. The proposed project would not include any amendments to the existing Zoning Ordinance, increase population, or result in a substantial increase in motor vehicle trips in the project area. Additionally, the proposed project would remain consistent with the existing land use designation as delineated in the County's general plan.

Therefore, because the proposed project is consistent with the uses allowed by the Land Use Element and Zoning Ordinance, the proposed project was anticipated in SANDAG growth projections used in establishing the RAQS and SIP. As such, the proposed project would not conflict with or obstruct implementation of any applicable air quality plans. Impacts would be less than significant, and no mitigation measures are required.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard?

Less than Significant Impact. As discussed under threshold III.a., the project site is in the SDAB, which is classified as a nonattainment area for federally and state-designated criteria pollutants, including O₃, PM₁₀, and PM_{2.5}. Construction activities associated with the proposed project would generate short-term emissions of reactive organic gas (ROG), nitrogen oxide (NO_x), carbon monoxide (CO), sulfur oxide (SO_x), PM₁₀, and PM_{2.5}. Exhaust emissions would originate from construction equipment, worker vehicle trips, delivery trips, and haul truck trips. Fugitive dust would be generated during material movement, land clearing, and grading activities. Construction-related emissions would vary substantially depending on the level of activity, the specific construction operations, and wind and precipitation conditions. All emissions would be temporary and would cease once construction is complete. The proposed project is required to comply with SDAPCD rules and regulations, including Rules 50, 51, and 55. Construction is assumed to occur over a 4-month period. Estimated maximum daily emissions during the construction period are not expected to exceed relevant County or SDAPCD's thresholds for any criteria pollutant (ROG, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}). Additionally, once operational, the proposed project area would be vacant land. There would be no increase in population, and no increase or change in vehicle trips or emission sources long-term. Therefore, the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. The proposed project would not expose sensitive receptors to substantial pollutant concentrations. Sensitive receptors are facilities and structures where people live or spend considerable amounts of time, and include retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities. The proposed project site is surrounded by vacant land and is not within proximity of any sensitive receptors.

Diesel Particulate Matter (DPM), which is classified as a carcinogenic toxic air contaminant by the California Air Resources Board (CARB), is the primary pollutant of concern with regard to health

risks to sensitive receptors. Diesel-powered construction equipment as well as any heavy-duty truck movement would emit DPM that could potentially expose sensitive receptors to pollutant concentrations. According to the project schedule, demolition is expected to last 4 months, which is much shorter than the assumed 70-year exposure period used to estimate lifetime cancer risks, and exposure would be intermittent and infrequent. Once demolition activities have ceased, so too will the source emissions. Once operational, there would be no increase or change in emissions over existing conditions.

Given the brief construction schedule and absence of sensitive receptors in proximity to the project site, implementation of the proposed project is not anticipated to expose sensitive receptors to substantial DPM concentrations. Impacts related to sensitive receptor exposure to substantial DPM concentrations would be less than significant, and no mitigation measures are required.

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

Less than Significant Impact. Project-related odor emissions would be minimal and would not affect a substantial number of people. During construction activities, emissions from offroad equipment may be evident in the immediate area on a temporary basis. Potential sources that may emit odors during construction activities include material deliveries and hauling heavy-duty truck trips, which could create an occasional “whiff” of diesel exhaust for nearby receptors. However, these odors would not affect a substantial number of people because the scale of construction would be small and temporary, and the project site is surrounded by vacant land and effectively absent of nearby receptors. Given that there would be no activities associated with operation, there would be no objectionable odors, and no permanent impacts. Therefore, impacts during construction and operation related to other emissions such as odors would be less than significant.

Mitigation Measures

Project implementation would not result in significant impacts related to air quality. Therefore, no mitigation is required.

IV. Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified 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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Affected Environment

A biological resources letter report was prepared for this proposed project (ICF 2022), which describes the environmental setting for the project, provides the methods and results of focused habitat assessments and special-status species surveys. This document is hereby incorporated by reference. A summary of the affected environment is presented below.

The proposed project consists of work areas on the northern and southern sides of the trestle, three staging areas, as well as existing access roads and trails which will be widened in narrow sections to allow for access. The biological study area (BSA) for the proposed project consisted of 1) a 50-foot buffer (100-foot survey corridor) along all proposed road improvements, including turn-around

areas; and 2) a 100-foot buffer (200-foot survey corridor) of the existing trestle bridge and aboveground pipe sections. An initial site assessment was conducted in 2014. Vegetation mapping, habitat assessment, and rare plant surveys were conducted in the BSA in 2020. A focused bat survey was conducted in August 2020. A focused Quino checkerspot butterfly (*Euphydryas editha quino*; QCB) habitat assessment and host plant mapping was conducted in March 2022. A protocol-level dry season survey and analysis was conducted in three road ruts within access roads in 2022; the USFWS survey report is attached to the biological resources letter report (ICF 2022).

A total of six vegetation communities and land cover types were mapped within the BSA, including disturbed habitat, Diegan coastal sage scrub, non-native grassland, southern willow scrub (including restored), eucalyptus woodland, and bedrock. Six California Rare Plant Ranking (CRPR) plant species were observed within the BSA: San Diego barrel cactus (*Ferocactus viridescens*; CRPR 2B.1), San Diego County viguiera (*Viguiera laciniata*, CRPR 4.2) San Diego goldenstar (*Bloomeria clevelandii*, CRPR 1B.1), small-flowered microseris (*Microseris douglasii* ssp. *platycarpa*, CRPR 4.2), Tecate cypress (*Hesperocyparis forbesii*, CRPR 1B.1), and singlewhorl burrobush (*Ambrosia monogyra*, CRPR 2B.2).

QCB are reported within 1 kilometer of the BSA and therefore any suitable habitat will be considered occupied. A detailed mapping of host plants for QCB was conducted and found host plants in and adjacent to the proposed project.

Sensitive reptile species, including red-diamond rattlesnake (*Crotalus ruber*; California Species of Special Concern [SSC]), Blainville's horned lizard (*Phrynosoma blainvillii*; SSC), and coastal western whiptail (*Aspidocelis tigris stejnegeri*; SSC), have potential to utilize upland habitats in the BSA.

Two-striped gartersnake (*Thamnophis hammondi*; SSC) is a primarily aquatic species with high potential to utilize the riparian areas in the Otay River under the trestle bridge in the BSA.

Least Bell's vireo (*Vireo bellii pusillus*) is a federally and state-listed endangered migratory songbird which was observed in suitable habitat under the bridge in 2014. No designated critical habitat for least Bell's vireo exists within the BSA. All riparian habitat under the trestle bridge within the BSA would be considered vireo-occupied habitat during the breeding season (March 15–September 15, annually). Other SSC summer breeding birds with high potential to utilize the BSA include yellow warbler (*Dendroica petechia*) and yellow-breasted chat (*Icteria virens*); suitable habitat within the BSA is considered occupied by yellow warbler and yellow-breasted chat during the summer.

California Gnatcatcher (*Polioptila californica californica*) is a federally threatened and SSC resident songbird closely associated with coastal sage scrub. The BSA contains 4.63 acres of Diegan coastal sage scrub suitable as breeding habitat for coastal California gnatcatcher. During 2020, three California gnatcatchers were observed within the 4.63 acres of Diegan coastal sage scrub habitat observed in the BSA. No designated critical habitat for California gnatcatcher exists within the BSA.

San Diego fairy shrimp (*Branchinecta sandiegonensis*), a federally-listed endangered large branchiopods, are known to occur within vernal pool preserves in the vicinity of the BSA. Three road ruts potentially suitable as habitat for San Diego fairy shrimp were observed in these access roads the BSA. The sampled road ruts are shallow and isolated features, which made them unlikely to support fairy shrimp. The sampled ruts were assessed to have low potential to support San Diego fairy shrimp prior to sampling, but this dry season survey was conducted to provide information on potential occupancy. No fairy shrimp cysts were observed in soil samples from any of the three sampled depressions in the BSA during a dry season focused survey in 2022; no cysts of San Diego

fairy shrimp or any other large branchiopods were observed (Appendix E of ICF 2022, *2022 Dry Season Fairy Shrimp Survey for Trestle Bridge Removal and High Head Pump Station*).

San Diego fairy shrimp are known from vernal pool preserves in the vicinity and large basins on terraces below, in the Otay River Valley, so the potential for them to occur was not discounted. In the Otay Mesa region, fairy shrimp are frequently found within road ruts because mud carried on vehicles can move cysts and introduce the species into new habitat; there is also some potential for cysts to be moved by waterfowl, shorebirds, or other wildlife. The vernal pool preserves in the vicinity of these two projects are fenced, which vastly reduces potential for vehicular transmission from vernal pools into road ruts within the BSA. Because of the lack of cysts in these ruts, the ruts are determined to not support San Diego fairy shrimp.

No sensitive bat species were observed within rock features in the BSA during a survey by SDNHM bat biologist Drew Stokes in 2020. Within the BSA, suitable habitat for cave and rock nesting bat species included two fractures in rocks: 1) a large, horizontal fracture (approximately 5-feet long and 5 feet above the northern end of the structure in the rocky habitat, with a southwestern-facing aspect; and 2) a large diagonal fracture (with a series of fractures branching from it) at the southern end of the structure in a steep vertical cliff with a northwestern-facing aspect. Just after sunset, several small bats were observed, identified as canyon bats (*Parastrellus hesperus*), which are rock-crevice dwellers that typically roost solitarily, but are sometimes found in small colonies. Using a bat call detector, SDNHM also detected several Mexican free-tailed bats (*Tadarida brasiliensis*) and two western small-footed myotis (*Myotis ciliolabrum*). No bats were observed exiting from any of the fractures or rocky habitat near the structure. SDNHM concluded that there were no bat colonies in or directly adjacent to the structure.

The Otay River under the BSA is assumed to be a state jurisdictional wetland and has potential to have federally protected wetlands within the riparian area. The trestle pipeline would be removed by crane; no work would be conducted within the Otay River. No vegetation would be removed, and no deposition would occur into any potential wetlands in the Otay River. Because no work would occur in the Otay River, a formal jurisdictional delineation was not considered to be necessary and was not conducted. No other potentially jurisdictional drainages were present in the BSA.

Discussion

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?

Less than Significant with Mitigation Proposed.

Sensitive Plant Species. Four special-status plant species were observed within the BSA: San Diego barrel cactus, San Diego goldenstar, Tecate cypress, and singlewhorl burrobush. The project has potential to affect these CRPR 1 and CRPR 2 species. Impacts on individuals of any of these species would be potentially significant; individual species are discussed below.

A few individuals of Tecate cypress and singlewhorl burrobush are present in and adjacent to the potential impact area. Impacts on these large shrubs would be avoided through implementation of Avoidance and Minimization Measure (AMM)-BIO-1, *Biological Preconstruction Survey*, and AMM-

BIO-2, *Biological Monitoring* (below). Within implementation of these avoidance measures, there would be *no impact* on these species.

Numerous individual San Diego barrel cactus are present in the potential impact area on the northern side of Otay River. These individuals are primarily scattered on bedrock cliffs. Impacts on these cactus would be avoided through implementation of AMM-BIO-1 and AMM-BIO-2. With implementation of these avoidance measures, there would be *no impact* on San Diego barrel cactus.

Populations of San Diego goldenstar are present in the BSA, adjacent to the potential impact area. Impacts on San Diego goldenstar would be avoided through implementation of AMM-BIO-1 and AMM-BIO-2. Within implementation of these avoidance measures, there would be *no impact* on San Diego goldenstar.

Two CRPR 4 (species of limited distribution) species were observed within the BSA: San Diego County viguiera and small-flowered microseris. These species are not considered to meet the definition of endangered or rare under California Environmental Quality Act (CEQA) Section 15380. Because the project is very limited in its extent and the total number of these species that could be affected, any impacts on individuals of these species would not affect the local long-term survival of the species. Given that San Diego County viguiera and small-flowered microseris are not considered special-status species at this location, any impacts on these species *would not be an impact* on a sensitive species.

Special Status Animal Species

Riparian Birds. Sensitive neotropical migrant riparian bird species, including least Bell's vireo, yellow warbler, and yellow-breasted chat, have potential to utilize habitat under the proposed project as breeding habitat. Impacts on suitable habitat would be a significant impact on these species. The project is designed to work from a crane from the canyon sides and would not enter or affect the sensitive riparian habitat in the Otay River below. This aspect of the project would have no impact on riparian bird habitat.

The disturbed pull-out at the southwestern end of the potential impact area was mapped as southern willow scrub–restoration but is primarily vegetated with small goldenbush and is not currently suitable breeding habitat for riparian birds. This area will be used for temporary staging of equipment; it will not be graded and vegetation would not be removed. Because this area is not yet habitat for riparian birds, the project would not result in an impact on suitable breeding habitat for riparian bird species and any direct impacts on vegetation in this area would have no impact on riparian birds.

Work adjacent to or over riparian habitat in the Otay River during the breeding season could result in noise and other indirect disturbance impacts on the breeding success of sensitive riparian bird species through disturbance of activity patterns, stress, and distraction, which could lead to reduced nesting success or mortality by predation. These indirect effects, if they occurred during the breeding season would be a potentially significant impact on breeding riparian birds. AMM-BIO-3, Project Timing, ensures that project activities would not occur during the breeding season. Therefore, the project would have no impact on riparian bird species.

Coastal California gnatcatcher is assumed to occupy the 4.63 acre of Diegan coastal scrub present in the BSA. The project has the potential to temporarily disturb up to 0.36 acre of Diegan coastal sage scrub habitat on roadside access roads, determined by overlaying the potential impact area

over the mapped vegetation communities. The actual temporary impacts may be less than this, because of the imprecision in comparing proposed work areas to vegetation communities mapped on air photos. Any impacts on roadside vegetation would be reduced through implementation of AMM-BIO-2, which would ensure that shrub impacts are minimized.

Project activities during the breeding season could result in direct or indirect effects on nesting coastal California gnatcatcher and would be a potentially significant impact. However, the project is designed to avoid activities during the breeding season. AMM-BIO-3, Project Timing, ensures that the project would not occur during the breeding season. Therefore, the project would have no impact on coastal California gnatcatcher.

With implementation of AMM-BIO-2 and AMM-BIO-3, the project would have no impact on coastal California gnatcatcher.

Raptors. Sensitive raptor species, including white-tailed kite and northern harrier, have potential to nest within the BSA. The project was designed to be conducted within the winter to avoid any project-related direct or indirect impacts on sensitive raptor species. Additionally, AMM-BIO-3 ensures that the project would not occur during the breeding season. Therefore, the project would have no impact on raptor species.

Sensitive reptile species, including red-diamond rattlesnake, coast horned lizard, and coastal western whiptail, have potential to utilize the BSA. The project would have limited temporary impacts on habitat for these species; disturbance of roadside vegetation would be a less than significant impact. Direct impacts on individuals of these species would be a significant impact. Implementation of AMM-BIO-1 and AMM-BIO-2 would ensure that the project does not have direct impact on these species.

Two-striped gartersnake has high potential to utilize the Otay River in the BSA under the trestle bridge. Removal of the trestle bridge would have no impact on riparian habitat in the Otay River; therefore, the project would have no impact on two-striped gartersnake.

QCB is known from the vicinity of the BSA, and all populations of host plants would be considered occupied habitat. Construction of the project during the flight season in proximity to occupied habitat would have potential to affect adult QCB. Implementation of AMM-BIO-3 would ensure that the project would not occur during the flight season of QCB and would have no impact on flying adult species.

The project has potential to affect QCB host plants potentially occupied by larval QCB. Impacts on occupied larval host plants would be a potentially significant impact under CEQA. Implementation of AMM-BIO-1, AMM-BIO-2, and AMM-BIO-3 would ensure the avoidance of potential impacts on QCB and would therefore have no effect on QCB.

Bats. A focused habitat assessment and survey for bat species conducted by SDNHM bat biologists in 2020 determined that sensitive bat species were absent from the BSA and that no bat species were utilizing the trestle bridge. Because of bat species absence, the project would have no effect on sensitive bat species.

Fairy Shrimp. A protocol-level, dry-season survey was conducted in 2022 by an ICF fairy shrimp biologist in three small road ruts in the BSA. These road ruts were initially assessed to be marginal suitability, and the dry-season soil analysis determined that no fairy shrimp cysts were present in the ruts. Because fairy shrimp are absent from the BSA, and the proposed project would have no

impacts on the watersheds of any vernal pools, the proposed project would have no impact on listed fairy shrimp.

Avoidance and Minimization Measures

AMM-BIO-1: Biological Preconstruction Survey. Due to the presence of Quino checkerspot butterfly (QCB) host plants and rare plants in the potential impact area, the shoulders of the dirt roads and proposed off-road traverses will be inspected for presence of QCB host plants within 7 days prior to construction. QCB host plants known from the site include dot-seed plantain, purple owl's clover, and purple Chinese houses. Populations of host plants mapped in March 2022 and any newly observed host plants present along road shoulders shall be flagged for avoidance with staking and flagging. If any host plants are present within the proposed off-road travel paths, then the population shall be flagged and shall be avoided; no machinery shall drive over host plant locations at any time of year.

AMM-BIO-2: Biological Monitoring. Due to the presence of Quino checkerspot butterfly (QCB) and its host plants, California gnatcatcher, and sensitive plants in the vicinity of the site, a biological monitor will be onsite full-time during project activities. The Biological Monitor will ensure that equipment is constrained to existing disturbed road and pads to the maximum extent practicable and will avoid flagged sensitive resources. The Biologist will sweep ahead of equipment to ensure that no sensitive reptiles or mammals are affected by vehicle movements. The biologist will ensure that project activities do not affect any QCB host plants, Tecate cypress, singlewhorl burrobush, San Diego barrel cactus, or San Diego goldenstar.

AMM-BIO-3: Project Timing. Sensitive neotropical migrant bird species utilize riparian habitat around the project during the summer, and sensitive resident bird species will breed in the surrounding open space during the breeding season. Quino checkerspot butterfly (QCB) have potential to fly from late February to early May. To avoid any potential impacts on federally listed QCB and listed and sensitive bird species, all work will be conducted within the period of September 15 to February 15.

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

Less than significant impact. The project proposes to remove hard structures from open space and would have no permanent development footprint. The project would have no ongoing operations impacts. Therefore, the project would have no permanent impacts on sensitive natural communities.

The project would have potential for temporary disturbance on sensitive vegetation communities on roadsides and in existing disturbed roadside areas. Sensitive vegetation within the mapped potential impact area includes 0.36 acre of Diegan coastal sage scrub, 0.05 acre of non-native grassland, and 0.08 acre of southern willow scrub (revegetation area) (Table 1).

Table 1. Vegetation Communities within the Potential Impact Area

Oberbauer Code	Vegetation Community Name	Project Impacts (acres)
11300	Disturbed Habitat	0.45
32500	Diegan Coastal Sage Scrub†	0.36
42200	Non-Native Grassland†	0.05
63320	Southern Willow Scrub (restoration)†	0.08
79100	Eucalyptus Woodland	0.04
N/A	Bedrock	0.03
Total		0.99

†= sensitive vegetation community

The actual temporary impacts may be less than the values in Table 2 due to the imprecision in comparing proposed work areas to vegetation communities mapped on air photos. Impacts on roadside vegetation would be reduced through implementation of AMM-BIO-2, which would ensure that equipment is constrained to existing disturbed road and pads to the maximum extent. The small size of the roadside impacts would be a *less than significant impact*.

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

No impact. The trestle bridge spans the Otay River, which is potentially jurisdictional to USACE, RWQCB, and CDFW, and which has potential to contain state and federal wetlands. Trestle bridge demolition would be conducted entirely by crane and/or helicopter and would not affect the Otay River below. Therefore, the project would have *no impact* on state or federally protected wetlands.

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?

Less than significant impact. The trestle bridge spans the Otay River, which may serve as a wildlife corridor for native species. The proposed project would not have any direct temporary impacts on habitat within the riparian corridor and would have no permanent impacts. The project would remove a developed structure from the otherwise-undeveloped vicinity and would have no continued operations after removal. Construction work on the project would only be conducted during daytime hours and would have limited temporary impacts on what would be primarily nocturnal movements within the Otay River and surrounding uplands. Therefore, the project would have a *less-than-significant impact* on wildlife movement.

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

No Impact. No local policies or ordinances protecting biological resources would apply to this project. Therefore, the project would have *no impact* on local policies or ordinances.

f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?

No Impact.

The project does not conflict with any habitat conservation plans. The project is located within the limits of San Diego Multiple Species Conservation Program (MSCP) County of San Diego MSCP Subarea Plan County Subarea Plan ('South County' Plan) South County Segment. The trestle removal site and most of the access roads are located within APN 6441001900, which is owned by County of San Diego and managed as part of the County Lakes Regional Park. APN 6441001900 was designated in the County Subarea Plan as a "Take Authorized" parcel. This designation is for lands whose impacts were mitigated with the establishment of Hardline Preserves in South County Segment, and for which no additional mitigation is required for impacts to covered species or their habitats. While activities conducted by OWD are not covered activities under the MSCP, the Take Authorized designation shows that activities within this parcel do not have an effect on hardline preserve or biological resource core areas.

V. Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No impact. No historical resources have been identified within the project site. On June 18, 2021, ICF conducted a pedestrian survey and inventory of the project area. The survey included an evaluation of the trestle structure due to its age over fifty years old (built between 1954 and 1963). The trestle structure was examined and documented at the north and south ends and the section spanning the canyon was not surveyed due to safety concerns and inability to access. The survey and evaluation determined neither the bridge nor the pipeline would be eligible for listing on the CRHR under Criterion 1, 2, or 31, or Criterion D. Therefore, the proposed project would not cause an adverse change in the significance of a historical resource. The impact would be less than significant.

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

Potentially Significant Impact. A cultural resources records search for the project identified one archaeological site, a prehistoric lithic scatter within the project area. On June 18, 2021, ICF conducted a pedestrian survey and inventory of the project area. The survey did not identify any new archaeological resources and did not relocate the existing archaeological site in the project area. The previously recorded site intersects with the southern part of the project area and was surveyed around its intersection with the project area. No cultural materials associated with the site were identified. Road construction and the construction of the detention facility appear to have destroyed the site. The site appears to have been an expedient tool making or cobble testing site in conjunction with the location on a mesa type, subsurface deposits are unlikely to be associated with the resource. The site is not recommended eligible for the CRHR under Criterion D. However, although no cultural resources were observed, it is possible there are deposits present in the subsurface that could be exposed by ground-disturbing activities occurring as part of the proposed demolition. Therefore, due to the presence of a previously recorded site and the proposed ground-disturbing activities, a significant impact to an archaeological resource could occur. To reduce the potentially significant impact, mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, as

described below, would be implemented during the project. These mitigation measures are consistent with mitigation measures required in the Otay Water Facilities Master Plan Update PEIR (OWD 2016). These mitigation measures would require additional cultural resource survey if the project boundaries change to include areas that were not surveyed for the project, and would require archeologist and Native American monitoring during grading activity. If archaeological resources are discovered during ground-disturbing activities, the mitigation measures would require the contractor to direct work away from the location of the discovery, and either avoidance of the resource, reduction in ground-disturbing activities, or recovery of the archaeological resource. With the implementation of these mitigation measures, the impact would be reduced to less than significant.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact. The project site is not a formal cemetery and is not located near a formal cemetery. There are no known instances of human remains being identified in the project area, and the site is not known to be on a burial ground. Implementation of the proposed project would involve ground disturbance in an area that has previously been disturbed. Therefore, it is unlikely that the proposed project would disturb any human remains during proposed project activities.

Should human remains be uncovered during construction, as specified by State Health and Safety Code Section 7050.5, no further disturbance would occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to Public Resources Code (PRC) 5097.98. If such a discovery occurs, excavation or construction would halt in the area of the discovery, the area would be protected, and consultation and treatment would occur as prescribed by law. If the County Coroner recognizes the remains to be Native American, he or she would contact the Native American Heritage Commission, who would appoint the Most Likely Descendant. Additionally, if the remains are determined to be Native American, a plan would be developed regarding the treatment of human remains and associated burial objects. As required by PRC 5097.98, the plan would be implemented in coordination with the Most Likely Descendant. Impacts would be less than significant.

Mitigation Measures

Project implementation would potentially result in significant impacts related to cultural resources. The following mitigation measures shall be implemented.

MM-CUL-1: Survey Additional Project Area if Project Boundary Changes. If the boundary of the project area were to change during project design or implementation, any additional areas that were not previously surveyed during the initial project pedestrian survey and evaluation shall be surveyed by a qualified archaeologist.

MM-CUL-2: Archaeologist and Native American Monitoring during Grading Activities. Prior to grading, OWD shall retain a qualified archaeologist to monitor all ground-disturbing activities in coordination with a Native American monitor (as applicable). Prior to beginning any work that requires cultural resources monitoring:

- i. A preconstruction meeting shall be held that includes the archaeologist, construction supervisor and/or grading contractor, and other appropriate personnel to go over the cultural resources monitoring program.

- ii. The archaeologist shall (at that meeting or subsequently) submit to the OWD a copy of the site/grading plan that identifies areas to be monitored.
- iii. The archaeologist shall coordinate with the construction supervisor and OWD on the construction schedule to identify when and where monitoring is to begin, including the start date for monitoring.
- iv. The archaeologist shall be present during grading/excavation and shall document such activity on a standardized form. A record of monitoring activity shall be submitted to OWD each month and at the end of monitoring.

MM-CUL-3: Resource Management. In the event archaeological resources are discovered during ground-disturbing activities, the on-site construction supervisor shall be notified and shall redirect work away from the location of the discovery to allow for preliminary evaluation of potentially significant archaeological resources. The OWD shall consult with the archaeologist to consider means of avoiding or reducing ground disturbance within the archaeological site boundaries, including minor modifications of project footprints, placement of protective fill, establishment of a preservation easement, or other means. If development cannot avoid ground disturbance within the archaeological site boundaries, then OWD shall implement the measures listed below. The construction supervisor shall be notified by the archaeologist when the discovered resources have been collected and removed from the site, at which time the construction supervisor shall direct work to continue in the location of the discovery.

- i. Prepare a research design, resource evaluation plan and, if necessary, an archaeological data recovery plan that will capture those categories of data for which the site is significant. The significance of the discovered resources shall be determined in consultation with the Native American representative, as appropriate. All archaeological work shall be conducted in the presence of a Native American monitor.
- ii. If, in the opinion of the qualified archaeologist and in light of the data available, the significance of the site is such that data recovery cannot capture the values that qualify the site for inclusion in the CRHR, then OWD shall reconsider project plans in light of the high value of the resource, and implement more substantial project modifications that would allow the site to be preserved intact, such as redesign, placement of fill, or relocation or abandonment.
- iii. Perform appropriate technical analyses, prepare a report and file it with the SCIC, and provide for the permanent curation of recovered resources, as follows:
 - a. The archaeologist shall ensure that all significant cultural resources collected are cleaned, catalogued, and analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; that specialty studies are completed, as appropriate; and that a letter of acceptance from the curation institution has been submitted to OWD.
 - b. Curation of artifacts shall be completed in consultation with the Native American representative, as applicable.

VI. Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. Energy resources include electricity, natural gas, transportation fuel, and other fuel and energy sources. During demolition, there would be a temporary consumption of energy resources required in the form of fuels to power heavy-duty construction equipment, material delivery and haul vehicles, as well as construction worker commuting. Compliance with local, state, and federal regulations would reduce short-term energy demand during the project's demolition to the extent feasible. Demand for fuel during construction would have no noticeable effect on peak or baseline demands for energy. Thus, the project would not result in a wasteful, inefficient, or unnecessary consumption of energy that could result in potentially significant environmental effects use.

The proposed project does not have an operational phase that would result in energy use. Thus, the project would not result in impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction (demolition) or operation. Energy impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. State and local agencies regulate the use and consumption of energy through various methods and programs. As a result of the passage of AB 32 and Senate Bill (SB) 32, both of which seek to reduce the effects of greenhouse gas (GHG) emissions through various measures, including but not limited to renewable energy production and energy efficiency measures.

Demolition activities associated with the proposed project would be required to be in accordance with County and state requirements. Therefore, the proposed project would not conflict with or obstruct state or local plans, and impacts would be less than significant.

Mitigation Measures

Project implementation would not result in significant impacts related to energy. Therefore, no mitigation is required.

VII. Geology, Soils, and Paleontological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

a.1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or

based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant Impact. The project site is in a known seismically active region where several known earthquake faults occur. While the potential for ground rupture due to faulting at the site is considered low, lurching or cracking of the ground surface as a result of a nearby seismic event is possible. However, demolition activities will be temporary and operation of the proposed project does not include any habitable structures. Therefore, impacts would be less than significant.

a.2. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?

Less than Significant Impact. The primary seismic hazard for the project site, as with most of the southern California region, is the susceptibility to ground shaking due to the presence of major active or potentially active faults in the region. The proposed project involves the demolition of a steel trestle and removal of an abandoned 24-inch water pipeline and would not include an operational phase; nor would it include construction of any habitable structure. As such, the proposed project would not cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Impacts would be less than significant.

a.3. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Potential secondary seismic effects of strong seismic ground shaking include liquefaction, lateral spreading, and seismically induced settlement/differential compaction. Liquefaction is defined as a loss of strength of saturated, cohesionless soil generally due to seismic shaking. Soil types most susceptible to liquefaction are loose, saturated silty to clean fine sands. The project site lies is not mapped within a liquefaction hazard (County of San Diego 2011). Therefore, the potential for hazards from liquefaction and subsequent lateral spreading on this site would be negligible. Seismically induced settlement consists of dry dynamic settlement (above groundwater) and liquefaction-induced settlement (below groundwater). During a strong seismic event, seismically induced settlement can occur within loose to moderately dense sandy soil due to reduction in volume during, and shortly after, an earthquake event. Some seismically induced settlement may occur within the onsite younger sandy alluvial soils. However, compliance with all applicable building codes and standards would reduce project impacts to levels that are less than significant.

a.4. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?

Less than Significant Impact. Several formations within the San Diego region are particularly prone to landsliding. These formations generally have high clay content and mobilize when they become saturated with water. Other factors, such as steeply dipping bedding that project out of the face of the slope and/or the presence of fracture planes, will also increase the potential for landsliding. No landslides or indications of deep-seated landsliding are present at the project site. The project site is generally underlain by favorable oriented geologic structure, consisting of gravel-cobble conglomerate. Therefore, the potential for significant landslides or large-scale slope instability at the project sites is considered low. As such, impacts would be less than significant.

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

Less than Significant Impact. Soil erosion and the loss of topsoil could occur during grading and demolition associated with the proposed project. The potential impacts of soil erosion on the project site would be minimal with the implementation of OWD's standard construction BMP requirements, which would include standard erosion control BMPs. As such, the impact on soil erosion and the loss of topsoil would be less than significant, and no mitigation measures are required.

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 onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less than Significant Impact. Three soil types, as defined by the U.S. Department of Agriculture (USDA), are mapped within the proposed project (Bowman 1973, NRCS 2013). These include San Miguel-Exchequer rocky silt loams (9 to 70% slopes), Huerhuero, Riverwash, and Terrace escarpments:

- San Miguel-Exchequer rocky silt loams is about 50% San Miguel silt loam and 40% Exchequer silt loam. Soils in the San Miguel series consist of well-drained shallow to moderately deep silt loams that have a clay subsoil. Soils in the Exchequer series consist of shallow and very shallow, well-drained silt loams. San Miguel-Exchequer complex occurs on mountainous uplands. In the project area, this soil type occurs north of the Otay River and in the southeastern portion of the project area.
- Huerhuero loams are moderately well drained soils with a clay subsoil, developed from sandy marine sediments. They occur from 10 to 400 feet AMSL on marine terraces.
- Riverwash typically occurs in intermittent stream channels. The material is typically sandy, gravelly, or cobbly. In the project area, this soil type occurs in association with the Otay River and its banks.
- Terrace escarpments consists of steep to very steep escarpments and escarpment-like landscapes. The terrace escarpments typically occur on the nearly even fronts of terraces or alluvial fans.

Project site soils are composed of soils consisting of silty to clayey sands with variable amounts of scattered gravel and some cobble. As discussed above, the project site is not located within an area mapped as a landslide or liquefaction hazard zone. As lateral spreading occurs when there are liquefiable soils, lateral spreading is also not anticipated to occur within the project site. As a result, the underlying geologic structure of the project site would not become unstable as a result of the project, resulting in an on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts would be less than significant.

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

Less than Significant Impact. Expansive soils are fine-grained soils (generally high-plasticity clays) that can undergo a significant increase in volume with an increase in water content and a significant decrease in volume with a decrease in water content. Changes in the water content of an expansive soil can result in severe distress to structures constructed upon the soil. The project would require soil disturbance; however, because of the proposed project does not involve the operation of any structures located on expansive soils, the potential for the proposed project to result in direct or

indirect risks to life or property at the project site is considered low. Demolition activities associated with the proposed project would comply with the requirements of Section 8.21.130 of the California Building Code, which addresses expansive soils. Therefore, impacts related to expansive soils would be less than significant.

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

No Impact. Implementation of the proposed project would not result in any impacts related to inadequate soils for supporting septic systems. No septic tanks or alternative wastewater disposal systems are proposed as part of the project. Thus, the onsite soils would not pose limitations to septic tanks or alternative waste water disposal systems because none are proposed as part of the project. Therefore, no impact would occur.

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

Less than Significant with Mitigation Incorporated. Paleontological sensitivity in the project area is marginal to high (County of San Diego 2011). Any ground disturbance that extends to undisturbed deposits of the formation has the potential to cause significant and adverse impacts on the paleontological resources preserved within the Otay Formation deposit. The proposed project would include excavation of no more than 5 feet below ground surface, which would potentially destroy a unique paleontological resource or site or unique geologic feature if it were to extend through the undocumented fill and into the formation. Therefore, impacts on paleontological resources would be potentially significant.

Mitigation Measures

MM GEO-1: If it is determined that excavation would extend below the artificial fill, a qualified paleontologist shall be retained by the project proponent prior to excavations reaching 10 feet in depth or greater. The qualified paleontologist shall develop and execute a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) and supervise a paleontological monitor who shall monitor all ground-disturbing activities associated with such excavations. The PRMMP would outline the procedures to follow with respect to paleontological resources (e.g. monitoring protocols, curation, data recovery of fossils, reporting). If fossils are found during such excavation, the paleontological monitor shall be authorized to halt ground-disturbing activities within 25 feet of the find in order to allow evaluation of the find and determination of appropriate treatment according to the PRMMP.

VIII. Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

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

Less than Significant Impact. The primary anticipated GHG emissions are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluoridated compounds. AB 32 sets forth the regulatory framework in California to reduce emissions to 1990 levels by 2020. SB 32 builds on AB 32 and establishes a longer-term goal of 40% below 1990 levels by 2030. Unlike criteria pollutants, which are primarily pollutants of regional and local concern, GHGs are a global problem. Therefore, GHG impacts and the analysis contained herein are inherently cumulative.

The State CEQA Guidelines do not indicate what amount of GHG emissions would constitute a significant impact on the environment. Instead, they authorize the lead agency to consider thresholds of significance that were previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence (State CEQA Guidelines Sections 15064.4(a) and 15064.7(c)). The courts have since confirmed that there are multiple potential pathways for evaluating project-level GHG emissions consistent with CEQA, depending on the circumstances of a given project. These potential pathways include reliance on a business-as-usual model, numeric thresholds, and compliance with regulatory emissions reduction plans and programs.

.Proposed project construction activities would contribute GHG emissions as a result of off-road diesel equipment exhaust and emissions from construction employee and any haul truck travel needed to dispose of materials off site over the construction period. Construction activities would be minimal, and sources of emissions would cease once construction is completed. Once the proposed project is constructed, no operational GHG emissions are anticipated to occur since the project only involves the demolition of a steel trestle and removal of an abandoned 24-inch water pipeline. As such, construction and operational GHG emissions are not expected to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. 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?

Less than Significant Impact. The District has not adopted a plan for the purpose of reducing the emissions of GHGs. The County of San Diego adopted their CAP in February 2018, which outlined strategies and measures to reduce the County's contribution to GHG emissions and to meet the state's 2020 and 2030 emissions targets, as well as ensure progress towards the state's 2050 reduction goal contains emissions reduction targets of 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050. To reach these targets, the CAP includes measures and strategies related to energy, transportation and land use, water, solid waste, and infrastructure (County of San Diego 2018). However, in 2020, the County of San Diego Board of Supervisors voted to set aside the approval of the 2018 CAP because a portion of the Supplemental EIR was found to be out of compliance with CEQA and is currently being updated. Although the CAP is being revised, the court did not find fault with the 26 GHG reduction measures (County of San Diego 2021).

CARB's 2017 Scoping Plan outlines the framework and strategies the state will take to achieve its 2030 emission reduction targets. The 2017 Scoping Plan Update proposes to meet the 2030 goal by accelerating the focus on zero and near-zero technologies for moving freight, continued investment in renewables, greater use of low-carbon fuels including electricity and hydrogen, stronger efforts to reduce emissions of short-lived climate pollutants (e.g., those resulting from wastewater and landfill practices), further efforts to create walkable communities with expanded mass transit and other alternatives to traveling by car, continuing the cap-and-trade program, and ensuring that natural lands become carbon sinks to provide additional emissions reductions and flexibility in meeting the target (CARB 2017).

As discussed previously, project-related GHG emissions would be minimal and would be limited to the brief construction period. Removal of the trestle bridge and water line will result in no operational changes. Thus, the proposed project is not expected to result in any new vehicle trip generation, energy or utility consumption, or waste generation. Therefore, given the minimal GHG emissions expected during construction and absence of operational activities, the proposed project would neither conflict with implementation of SB 32, nor impede state progress toward meeting the long-range reduction target identified in EO S-3-05. Impacts would be less than significant.

Mitigation Measures

Project implementation would not result in significant impacts related to greenhouse gas emissions. Therefore, no mitigation is required.

IX. Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Be located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

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

Less than Significant Impact. Project demolition would require the use of materials that are typically associated with construction activities, such as diesel fuels, hydraulic liquids, oils, solvents, and paints. Any potentially hazardous materials found on site would be removed in accordance with state and federal regulations regarding the transport, use, and storage of hazardous materials. The proposed project would not involve any operational activities. As such, generation of hazardous materials or hazardous waste would not occur. As a result, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident

conditions involving the release of hazardous materials. Therefore, construction and operational impacts for these issues would be less than significant.

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

Less than Significant Impact. Demolition would require the use of typical materials associated with construction activities such as diesel fuels, hydraulic liquids, oils, and solvents, which would be used in accordance with all applicable state and federal regulations. The proposed project would remove a trestle bridge and abandoned water line and there would be no activities associated with operation which would require the use of hazardous materials or generate hazardous waste. As a result, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Therefore, construction impacts would be less than significant.

c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact. The proposed project would not occur within 0.25 mile of an existing or proposed school. The closest school is High Tech High School, Chula Vista And High Tech Elementary School, Chula Vista located approximately 1.7 miles northeast of the project site. As discussed above, the project would not lead to hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, other than limited use of common hazardous materials during construction in accordance with applicable regulations. Therefore, impacts on nearby schools would not occur.

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

Less than Significant Impact. The project site is not included on a list of hazardous materials sites compiled pursuant to Section 65962.5 of the California Government Code (DTSC 2020). Therefore, the proposed project would not create a significant hazard to the public or the environment due to its location on a site that was included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Impacts associated with this issue would be less than significant.

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

Less than Significant Impact. The project site is approximately 2.7 miles northeast of Brown Field Municipal Airport. The proposed project would involve the demolition of a steel trestle and removal of an abandoned 24-inch water pipeline that crosses the Otay River. Once removed, the proposed project area would consist of vacant land and no activities associated with operation would occur. As such, the proposed project would not conflict with the Airport Land Use Compatibility Plan or any other applicable rules and regulations as they pertain to airports and airport safety (ALUC 2014). The proposed project would not create residences or other land uses that would be sensitive to aircraft noise. Therefore, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area; no impact would occur.

Demolition activities would require the temporary use of a crane to remove the trestle bridge, which would temporarily add a new structure to the airspace. As a result and because the project site falls within the Federal Aviation Administration (FAA) Height Notification Area, FAA review is required for the proposed project. Prior to demolition, FAA must be notified of the proposed structures that would exceed height limits or that would interfere with navigational aids within the project area. According to the FAA Notice Criteria Tool webpage, the proposed project is “in proximity to a navigation facility and may impact the assurance of navigation signal reception.” As a result, FAA requires the filing of Form 7460-1 for the proposed project at least 45 days prior to implementation of the proposed project.

A Form 7460-1s was filed on behalf of the District for the temporary use of a crane (Aeronautical Study No. 2020-AWP-12611-OE). The FAA reviewed the submittal and issued a Determination of No Hazard to Air Navigation for Temporary Structure letter on August 31, 2021, which indicates the proposed project would not interfere with air navigation. Thus, the proposed project would not result in safety hazards related to interference with airspace navigation. Therefore, impacts associated with this issue would be less than significant.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. Emergency management services are overseen by San Diego County Fire, which responds to emergencies and provides fire protection, fire prevention services, emergency medical services, and community emergency preparedness. Construction activities associated with the proposed project would occur in an undeveloped area and would not restrict access for emergency vehicles. After construction of the proposed project, emergency access would remain the same as existing conditions. Therefore, implementation of the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan, and there would be no impact.

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

Less than Significant Impact. The County of San Diego is subject to both wildland and urban fires because of its climate, topography, and native vegetation. Extended drought, characteristic of the region’s Mediterranean climate and increasingly severe dry periods associated with global warming, has resulted in large areas of dry native vegetation that provide fuel for wildland fires. State law requires all local jurisdictions to identify any Very High Fire Hazard Severity Zone (VHFHSZ) within their areas of responsibility (California Government Code Sections 51175–51189). Inclusion within these zones is based on vegetation density, slope severity, and other relevant factors that contribute to fire severity.

The project site is within an area that has been identified as a VHFHSZ wildland fire hazard area (CALFIRE 2020). The project site would be adjacent to native fuels that could exacerbate fire risk. The proposed project would involve demolition, during which the use of construction equipment and materials that may cause sparks could increase the risk of the ignition or spread of wildfire. However, the use of such equipment would be temporary, and would be required to follow all fire-prevention protocols that are standard practice for the prevention of wildfire. The District would require the contractor to develop and implement a wildfire prevention plan during the demolition process. Operation of the proposed project would not introduce any new use that would exacerbate existing wildfire risks and would not include the installation or maintenance of infrastructure (such

as road, fuel breaks, emergency water sources, or other utilities) that may exacerbate a fire risk. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury, or death from wildfires, and the impact would be less than significant.

Mitigation Measures

Project implementation would not result in significant impacts related to hazards and hazardous materials. Therefore, no mitigation is required.

X. Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 that would:				
1. Result in substantial erosion or siltation on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less than Significant Impact. The project is not expected to use any form of wastewater or generate any wastewater or hazardous waste during construction. However, equipment used during construction would contain hazardous materials such as hydraulic oil, diesel fuel, and other products contained within construction vehicles and equipment. Therefore, impacts on water quality would be less than significant.

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

Less than Significant Impact. The proposed project does not propose to use groundwater during construction or operation. Therefore, the proposed project would not deplete groundwater supplies or interfere substantially with groundwater recharge, and impacts would be less than significant.

c.1. 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 that would: Result in substantial erosion or siltation on or off site?

Less than Significant Impact. The proposed project would result in grading activities but would not substantially increase impervious surfaces or alter the existing drainage patterns in a way that would result in substantial erosion or siltation. Therefore, a less-than-significant impact would occur.

c.2. 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 that would: Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site?

Less than Significant Impact. Grading and ground disturbance associated with demolition of the proposed project would not substantially increase impervious surfaces. Grading activities would not substantially increase the rate or amount of surface runoff. Therefore, impacts would be less than significant.

c.3. 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 that would: Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact. The proposed project would not alter the existing drainage pattern of the site and, therefore, would not result in an increase in the rate or amount of stormwater runoff from the site. As such, the proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, impacts would be less than significant.

c.4. 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 that would: Impede or redirect flood flows?

No Impact. The project site is not located within a floodplain. The project site is not located downstream of a dam or within a dam inundation area. As such, the proposed project would not impede or redirect flood flows. No impact would occur.

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

No Impact. The project site is located approximately 10 miles east of the nearest coastline and is outside the tsunami inundation areas along the coast. The nearest enclosed body of water is Lower Otay Lake, which is located 0.5 mile north of the project site. The site is not located within a tsunami

inundation area. Due to the distance of all enclosed bodies of water, no seiche-related flooding is anticipated to occur at the project site. Therefore, no impacts related to flood-hazard, seiche, or tsunami would occur.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. The project site is located within the San Diego Bay Watershed Management Area, within the Otay Hydrologic Unit (910.00) and is subject to the applicable requirements of the Basin Plan administered by the San Diego Regional Water Quality Control Board in accordance with the Porter Cologne Water Quality Control Act. The project would include LID measures and BMPs for drainage control that would be consistent with the Basin Plan.

Water use for demolition of the proposed project would be minimal and would be supplied by Otay Water District. As no water use would be required during operation of the proposed project, the project would not significantly deplete groundwater supplies. Additionally, minimal new impervious surface would be created as part of the project, resulting in minimal effects on groundwater recharge. Therefore, the project would not conflict with the groundwater management of the area. and potential impacts would be less than significant.

Mitigation Measures

Project implementation would not result in significant impacts related to hydrology and water quality. Therefore, no mitigation is required.

XI. Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a. Physically divide an established community?

No Impact. The proposed project would occur on primarily vacant land that is not within an established community. Therefore, implementation of the proposed project would not divide an established community, and no impact would occur.

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

No Impact. The proposed project would comply with the plan designations and applicable provisions of the County of San Diego General Plan (County of San Diego 2011). The proposed project would not result in any changes to the existing land use of the site, which currently has a land use designation of “Open Space Park of Preserve” and is zoned for agricultural use. Implementation of the proposed project would remove the trestle bridge and water line, and would not prevent this land from being used for agricultural purposes in the future. The proposed project would be consistent with all applicable land use plans, policies, and agency regulations to which it is subject, including the County of San Diego General Plan. Consequently, no impacts would occur.

Mitigation Measures

Project implementation would not result in significant impacts related to land use and planning. Therefore, no mitigation is required.

XII. Mineral Resources

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

Discussion

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?

No Impact. The Surface Mining and Reclamation Act of 1975 required the State Geologist to initiate mineral land classification to help identify and protect mineral resources in areas within the state. In accordance with guidelines established by the State Mining and Geology Board, mineral deposits in western San Diego County have been classified into Mineral Resource Zones. San Diego's principal mineral resources include salt, sand, and gravel, all of which have been produced in San Diego for decades. According to the Conservation and Open Space Element of the County of San Diego's General Plan, the project site lies adjacent to an area designated as MRZ 3 - Resource potentially present (County of San Diego 2011a). However, the proposed project would remove an existing structure and would not preclude future mineral resource recovery activities in the area. Additionally, no mineral extraction or other mining operations occur within the project site or in the immediate vicinity. Therefore, no impact would occur.

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

No Impact. The project site is not currently used for mineral resource extraction, nor is it located in an area with the known potential for locally important mineral resources. Additionally, the site is not designated in the County General Plan as a mineral resource recovery site (County of San Diego 2011b). Therefore, no impact to mineral resources would occur.

Mitigation Measures

Implementation of the project would not result in significant impacts related to mineral resources. As such, no mitigation would be required.

XIII. Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generate excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Be 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 and expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?

Construction

Less than Significant Impact. The primary existing sources of noise in the project vicinity are traffic accessing the City of San Diego Otay Water Treatment Plant, Otay Lakes County Park, and Otay Valley Regional Park (County of San Diego 2020). Other noise sources include the San Diego Regional Firearms Training Center located approximately 0.5 mile south of the proposed project at 440 Alta Rd, San Diego, CA 92154. The land uses surrounding the project site consist of vacant land. The nearest receptors would be Otay Lakes County Park and Otay Valley Regional Park. There are no residential uses in the vicinity of the proposed project.

Two types of short-term noise impacts could occur during project construction. First, construction vehicles would incrementally increase noise levels on access roads. This would include construction worker vehicles and haul trucks traveling to and from the project site through Otay Valley Regional Park. Although there would be a relatively high single-event noise level as trucks pass through the park, which could cause an intermittent noise nuisance, the effect on longer-term ambient noise levels would be small. Therefore, there would be no impacts related to the short-term noise associated with commuting construction workers and transporting equipment and materials to the project site.

The second category of construction noise would be noise generated during onsite project construction. Demolition would occur only during the permitted daytime hours of 7:00 a.m. to 7:00 p.m. as specified by the County of San Diego Municipal Code (Section 36.408). No demolition would occur on Sundays or holidays. Demolition noise will be temporary and will cease entirely once the

project is complete. Furthermore, no noise will be generated during the most sensitive nighttime hours. Demolition would comply with the applicable noise regulations of the County of San Diego Municipal Code, and the impact would be less than significant.

Operation

No Impact. The proposed project would remove a trestle bridge and abandoned water line. Upon completion of the proposed project, the proposed project area would consist of vacant land. There would be no activities associated with operation. Therefore, there would be no change in temporary or permanent increase in ambient noise levels as a result of the proposed project. There would be no impact.

b. Generate excessive groundborne vibration or groundborne noise levels?

Construction

Less than Significant Impact. Heavy construction equipment has the potential to generate groundborne vibration that could affect nearby structures or residents. However, as there are no neighboring sensitive buildings (i.e., homes) near the project site, and demolition would be temporary; impacts from groundborne vibration or groundborne noise levels would be less than significant.

Operation

No Impact. There would be no activities associated with the operation of the proposed project. Therefore, there would be no vibration impacts.

c. Be 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 and expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is approximately 2.7 miles northeast of Brown Field Municipal Airport. The proposed project would involve the demolition of a steel trestle and removal of an abandoned 24-inch water pipeline that crosses the Otay River. Once removed, the proposed project area would consist of vacant land and no activities associated with operation would occur. As such, the proposed project would not conflict with the Airport Land Use Compatibility Plan or any other applicable rules and regulations as they pertain to airports and airport safety (ALUC 2014). The proposed project would not create residences or other land uses that would be sensitive to aircraft noise. Therefore, the proposed project would not result in excessive noise for people residing or working in the project area; no impact would occur.

Mitigation Measures

Implementation of the project would not result in significant impacts related to noise. As such, no mitigation would be required.

XIV. Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?

No Impact. The proposed project does not include the construction of any homes or businesses or extension of roads or other infrastructure. Construction of the proposed project would result in the generation of temporary construction jobs; however, the additional jobs are expected to be filled by residents who currently live in the San Diego region. The jobs would not result in the relocation of any population. Therefore, the proposed project would not directly or indirectly induce substantial population growth through the creation of new homes or businesses in the San Diego region. No impacts would occur.

b. Displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project site does not contain any housing units. The proposed project does not propose any housing, nor does it propose any significant extension of roads or infrastructure. As such, because no existing housing units or people would be removed or displaced, the proposed project would not require the construction of replacement housing elsewhere. Therefore, no impacts would occur.

Mitigation Measures

Proposed project implementation would not result in significant impacts related to population or housing. Therefore, no mitigation is required.

XV. Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

Fire protection?

Less than Significant Impact. The proposed project is located in an undeveloped area that is currently served by San Diego County Fire. The nearest fire stations are CalFire Donovan Fire Station 26, located approximately 0.6 mile south, and San Diego County Fire Station 38, located approximately 1 mile south. The proposed project would not involve the creation of new habitable structures or new population growth that could generate increased demand for fire protection services. Demolition activities are not anticipated to disrupt existing fire protection services or affect response times. It is assumed that the presence of construction workers on site at the project site would not result in substantially increased demand for fire protection services and that the existing fire protection operations would be able to accommodate the construction activities of the proposed project. Construction impacts would be less than significant.

Police protection?

Less than Significant Impact. The proposed project is located in an undeveloped area that is currently served by the San Diego Sheriff's Department. The nearest police station, the Chula Vista Police Department, is located approximately 2.8 miles northwest of the project site at 201 Fourth Avenue, Chula Vista, CA 91915. The proposed project would not increase residential populations at

the project site or in nearby communities, and thus would not change the officer-to-population ratio for the area. Demolition activities are not anticipated to disrupt existing police protection services or affect response times. It is assumed that the presence of construction workers on site at the project site would not result in substantially increased demand for police protection services and that the existing police protection operations would be able to accommodate the demolition activities of the proposed project. Construction impacts would be less than significant.

Schools?

No Impact. The project would not include the development of housing units, nor would it induce population growth. Thus, no impact on capacities, service levels, or performance objectives for schools would be generated by the project. Therefore, no impact would occur.

Parks?

No Impact. The project would not include the development of housing units, nor would it induce population growth. Thus, no impact on capacities, service levels, or performance objectives for parks would be generated by the project. Therefore, no impact would occur.

Other public facilities?

No Impact. The project would not include the development of housing units, nor would it induce population growth. Thus, no impact on capacities, service levels, or performance objectives for other public facilities would be generated by the project. Therefore, no impact would occur.

Mitigation Measures

Project implementation would not result in significant impacts related to public services. Therefore, no mitigation is required.

XVI. Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

Less than Significant Impact. The project site is located within Otay Valley Regional Park and Otay Lakes County Park on vacant land with a land use designation of “Open Space Park of Preserve.” During demolition activities, the park would remain open, however trails would be closed as necessary, requiring users to recreate in other areas. The displacement of recreational users is not anticipated to result in additional strain on surrounding recreational facilities such that additional maintenance of these facilities would be required. Additionally, use of the adjacent recreational areas would be limited to the duration of demolition and would be temporary in nature. The proposed project would not directly or indirectly result in housing development or population growth on the project site or in the surrounding communities. With no new households or residents, the project would not increase the demand or use of local parks or regional recreational facilities. Therefore, the proposed project would have less than significant impacts on existing parks and would not create a need for new neighborhood or regional parks.

b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

No Impact. See the discussion under item XVI.a. The proposed project would not create a need for new neighborhood or regional parks. There would be no impacts.

Mitigation Measures

Project implementation would not result in significant impacts related to recreation. Therefore, no mitigation is required.

XVII. Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with State CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

Less than Significant Impact. The proposed project would not include any components that would result in long-term traffic generation. While demolition activities would generate a small number of trips associated with construction equipment and worker vehicles, these trips would be limited to the construction period, and would not be considered substantial in relation to the existing traffic load in the project vicinity. During construction of the proposed project, workers' vehicles and construction vehicles would access the site from Wueste Road and dirt access roads within Otay Lakes County Park. Roadway users could experience temporary delays from material deliveries, but these delays would be both brief and infrequent. Therefore, they would not affect overall roadway traffic circulation in the project vicinity. Construction would temporarily impede non-motorized travel along the dirt access roads and multi-use trails located within Otay County Lakes Park (County of San Diego 2017). Trail closures would be required during project construction; temporary traffic control during construction would meet the requirements of the *California Manual on Uniform Traffic Control Devices* (Caltrans 2014). As demolition would be temporary, and removal of the trestle bridge and water line would not permanently impact the circulation system, impacts would be less than significant.

Because there is no operations phase, the proposed project would not generate any trips associated with operations. There would be no impact.

b. Conflict or be inconsistent with State CEQA Guidelines section 15064.3, subdivision (b)?

Less than Significant Impact. In compliance with SB 743 and the County of San Diego Transportation Study Guidelines (TSG) (County of San Diego 2020), a project is required to evaluate transportation impacts under CEQA using a Vehicle Miles Traveled (VMT) metric, pursuant to guidance from the Governor's Office of Planning and Research (OPR) in December 2018 (*Technical*

Advisory on Evaluation Transportation Impacts in CEQA). VMT refers to the distance a vehicle travels from each origin to its destination.

The TSG identify VMT analysis methodologies, establish VMT thresholds for CEQA transportation impacts, and identify possible mitigation strategies (County of San Diego 2020). The TSG provide the following screening thresholds for land use projects that are presumed to have a less than significant VMT impact due to project characteristics and/or location. Table 2 includes the VMT screening criteria.

Table 2: CEQA VMT Screening

Project Type	Screening Threshold
Small Residential and Employment Projects	Less than 110 daily vehicle trips (trips are based on the number of vehicle trips after any alternative modes/location-based adjustments are applied)
Projects Located in VMT Efficient Areas	Use location-based screening maps (consistent with the project land uses)
Locally Serving Retail Projects	Projects that are 50,000 square feet or less
Locally Serving Public Facilities	Public facilities that serve the local community including transit centers, public schools, libraries, post office, park-and-ride lots, other government offices, parks/trail heads, and passive public uses.
Redevelopment Projects with Greater VMT Efficiency	The proposed project's total project VMT is less than the existing land use's total VMT.
Affordable Housing	100% affordable housing

Source: County of San Diego 2020.

The CEQA Guidelines recommend use of automobile VMT as the preferred CEQA transportation metric, along with the elimination of auto delay/LOS for CEQA purposes statewide. However, lead agencies have the discretion to select their preferred significance thresholds with respect to what level of VMT increase would cause a significant environmental impact. According to the County's TSG, the analysis must be conducted by comparing either the project VMT/capita or VMT/employee to the San Diego regional average. If the project average is lower than 85% of the regional average, the VMT impacts of the project can be presumed less than significant.

The proposed project would not produce a significant amount of vehicle trips during demolition and would not generate trips during operation. Therefore, the VMT impacts of the project can be presumed less than significant.

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

Less than Significant Impact. The proposed project would not result in any changes to the existing circulation system that would result in a geometric design feature or incompatible use. Demolition would require the use of typical on-road construction vehicles, which could temporarily block Wueste Road and dirt access roads within Otay Lakes County Park. As the use of construction vehicles would be temporary, it would not result in a significant increased hazard due to an incompatible use. Additionally, staging of equipment and vehicles would primarily be within the project site. There would be no activities associated with the operations of the project site,

therefore, there would be no hazards due to incompatible uses. Impacts would be less than significant.

d. Result in inadequate emergency access?

No Impact. Construction activities associated with the proposed project would occur in an undeveloped area and would not restrict access for emergency vehicles. After construction of the proposed project, emergency access would remain the same as existing conditions. There would be no activities associated with the operations of the project site; therefore, the proposed project would not alter existing conditions related to emergency access. The proposed project would not result in inadequate emergency access, and there would be no impact.

Mitigation Measures

Project implementation would not result in significant impacts related to transportation. Therefore, no mitigation is required.

XVIII. Tribal Cultural Resources

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

Discussion

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less than Significant Impact. On April 7, 2020, ICF contacted the NAHC requesting a review of its Sacred Lands Files. The NAHC responded on April 27, 2020, stating that the Sacred Lands File review failed to indicate the presence of Native American cultural resources in the study area. In addition, as discussed above in Section V. *Cultural Resources*, the historic Otay trestle structure does not qualify for listing in the NRHO or CRHR. The cultural resources survey did not identify any previously undocumented archaeological resources in the project area and did not relocate any components of the previously recorded resource. Please see Section V. *Cultural Resources*, for further discussion of potential cultural resources on the project site. Because no tribal cultural resources were identified, previously recorded cultural resources were not identified, and the trestle structure nor any other resource did not qualify for NRHP or CRHR listing, there would be less than significant impacts to Tribal cultural resources.

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place,

cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

Less than Significant Impact. The NAHC provided a list of 19 Native American individuals and organizations that may have knowledge of cultural resources in the study area. On June 22, 2020, ICF sent outreach letters to all 19 individuals and organizations identified by the NAHC. The letters described the proposed project and requested information on cultural resources in or nearby the study area. To date, replies have been received from the contacted Tribes. The District does not currently have any consulting Tribes. The Native American correspondence is documented in Appendix A. Therefore, the proposed project would not result in a significant adverse change to a tribal cultural resource, and the impact would be less than significant.

Mitigation Measures

Project implementation would not result in significant impacts related to tribal cultural resources. Therefore, no mitigation is required.

XIX. Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider that 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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

No Impact. The existing 24-inch water pipeline is currently abandoned; it was replaced by the Central Area and Otay Mesa Interconnection Pipeline in 2001. Therefore, the removal of this water line will not require the construction of water facilities elsewhere. The proposed project would not increase impervious surface in the project area during construction or operation. The proposed project would not require the relocation or construction of new water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. There would be no impact.

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

Less than Significant Impact. The project site is located in a rural area serviced by OWD. The proposed project would not require new or expanded entitlements for water service. Construction

at the project site would require temporary use of water for dust suppression or other construction activities. This water may be accessed through existing onsite utilities or brought to the site by water trucks. This use of water would be temporary and would not represent a significant water use demand. There would be no water use during operation of the proposed project. Therefore, impacts would be less than significant.

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

No Impact. No wastewater services or connections to existing facilities are required by the project. There would be no generation of wastewater as there would be no habitable structures on-site. No new impervious surface would be created as part of the project. It is assumed that any future stormwater runoff volumes would be similar in nature to the current conditions at the project site. Therefore, there would be no impacts on wastewater system capacity.

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

Less than Significant Impact. Solid waste generated during demolition and construction activities would be disposed of at Otay Landfill, which has sufficient capacity to accommodate the proposed project's disposal needs, or at another licensed recycling facility for recycling or reuse. No solid waste would be generated during operation. The impact would be less than significant.

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

No Impact. As described above, the proposed project would be served by a permitted landfill. In addition, the facility would continue to comply with federal, state, and local regulations related to solid waste. Therefore, no impacts would occur.

Mitigation Measures

Project implementation would not result in significant impacts related to utilities and service systems. Therefore, no mitigation is required.

XX. Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

No Impact. The County of San Diego's Emergency Operations Plan is the emergency response plan used by key partner agencies within the County to respond to major emergencies and disasters. The proposed project is within the San Diego County Operational Area (County of San Diego 2018). Construction activities associated with the proposed project would occur in an undeveloped area and would not restrict access for emergency vehicles. After construction of the proposed project, emergency access would remain the same as existing conditions. There would be no activities associated with the operations of the project site; therefore, the proposed project would not alter existing conditions related to emergency response or evacuation. The proposed project would not impair an adopted emergency response plan or emergency evacuation plan, and there would be no impact.

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

Less than Significant Impact. The County of San Diego is subject to both wildland and urban fires because of its climate, topography, and native vegetation. Extended drought, characteristic of the region's Mediterranean climate and increasingly severe dry periods associated with global warming, has resulted in large areas of dry native vegetation that provide fuel for wildland fires. State law requires all local jurisdictions to identify any Very High Fire Hazard Severity Zone (VHFHSZ) within their areas of responsibility (California Government Code Sections 51175–51189). Inclusion within

these zones is based on vegetation density, slope severity, and other relevant factors that contribute to fire severity.

The project site is within an area that has been identified as a VHFHSZ wildland fire hazard area (CALFIRE 2020). The project site would be adjacent to native fuels that could exacerbate fire risk, and the project site contains steep slopes that could be prone to landslide or erosion. The proposed project would involve demolition, during which the use of construction equipment and materials that may cause sparks could increase the risk of the ignition or spread of wildfire. However, the use of such equipment would be temporary, and would be required to follow all fire-prevention protocols that are standard practice for the prevention of wildfire. The District would require the contractor to develop and implement a wildfire prevention plan during the demolition process established by the District. Operation of the proposed project would not introduce any new use that would exacerbate existing wildfire risks. Therefore, the proposed project is not anticipated to exacerbate wildfire risk. 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 on the environment?

No Impact. The proposed project would not require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk. There would be no impact.

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?

No Impact. The proposed project is located within undeveloped area and would not expose people or structures to significant risks associated with post-fire hazards. There would be no impacts.

Mitigation Measures

Project implementation would not result in significant impacts related to wildfire. Therefore, no mitigation is required.

XXI. Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

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?

Less-than-Significant with Mitigation. As discussed above under Sections IV and V, potential impacts on biological resources would be less than significant with implementation of avoidance and minimization measures.

Regarding cultural resources, the site appears to have been an expedient tool making or cobble testing site in conjunction with the location on a mesa type, subsurface deposits are unlikely to be associated with the resource. The site is not recommended eligible for the CRHR under Criterion D. However, although no cultural resources were observed, it is possible there are deposits present in the subsurface that could be exposed by ground-disturbing activities occurring as part of the proposed demolition. Therefore, due to the presence of a previously recorded site and the proposed ground-disturbing activities, a significant impact to an archaeological resource could occur. To reduce the potentially significant impact, mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, as described below, would be implemented during the project. These mitigation measures are consistent with mitigation measures required in the Otay Water Facilities Master Plan Update PEIR (OWD 2016). These mitigation measures would require additional cultural resource survey if the

project boundaries change to include areas that were not surveyed for the project, and would require archeologist and Native American monitoring during grading activity. If archaeological resources are discovered during ground-disturbing activities, the mitigation measures would require the contractor to direct work away from the location of the discovery, and either avoidance of the resource, reduction in ground-disturbing activities, or recovery of the archaeological resource. With the implementation of these mitigation measures, the impact would be reduced to less than significant.

Additionally, as discussed in Section VII, the project site is underlain by the Otay Formation and the proposed project would include excavation up to 5 feet, which would potentially destroy a unique paleontological resource or site or unique geologic feature if it were to extend into the formation. Implementation of **MM-GEO-1** would require a qualified paleontologist to develop and execute a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) and supervise a paleontological monitor who would monitor all ground-disturbing activities. Therefore, impacts on paleontological resources would be reduced to a less than significant level.

As such, the Proposed Project would not result in impacts on biological resources that would have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal, nor would the proposed project eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be less than significant with implementation of mitigation.

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.)

Less-than-Significant Impact. As detailed throughout this Initial Study, the proposed project would not result in any significant impacts related to agriculture and forestry resources, mineral resources, population and housing, recreation, or tribal cultural resources, and therefore would not have any potential to contribute to a cumulatively considerable significant impact on any of these resource areas. Less-than-significant project-level impacts on aesthetics, air quality, biological resources, energy, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, transportation, utilities and service systems, and wildfire were identified. A cumulative analysis for these resources is presented below.

Cumulative impacts, as opposed to project-level impacts, are impacts on the physical environment that result from the incremental effects of the proposed project when added to other past, present, and reasonably foreseeable future projects. There are no known cumulative projects within the study area.

Additionally, the proposed project would be consistent with applicable federal, state, and local regulations and plans associated with aesthetics, biological resources, hydrology/water quality, utilities and service systems, and tribal cultural resources, including the City of La Mesa General Plan. Impacts related to cultural resources, geology/soils and hazards and hazardous materials are generally site-specific and not additive across a landscape. In addition, the less-than-significant impacts on these resources would not add appreciably to impacts of any cumulative projects that could result in a significant cumulative impact due to the minor nature of identified impacts and the

low intensity of known cumulative projects. Therefore, cumulatively considerable impacts related to these resource areas would not occur as a result of the proposed project.

Because the project involves only demolition of existing infrastructure, and emissions from construction would be temporary and localized, construction emissions for the proposed project would be minimal and would not cause a cumulatively considerable air quality impact. In addition, there would not be a substantial number of other concurrent projects or intensity of construction or operation in the immediate vicinity of the proposed project such that construction of the proposed project would contribute to a temporary cumulative impact related to noise and vibration or transportation and traffic. Once the demolition is completed, there is no subsequent or operations phase of the project. Therefore, the proposed project when combined with cumulative projects would not result in impacts that are individually limited, but cumulatively considerable. Consequently, impacts would be less than significant.

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

Less-than-Significant Impact. As demonstrated in the analysis in this Initial Study, the proposed project would not have any substantial adverse effects on the environment, including human beings, either directly or indirectly. The project involves only demolition activities, there is no operational phase; and demolition would be short in duration. Based on the size and nature of the proposed project, sensitive receptor health risks and exposure would be intermittent and infrequent. Furthermore, there would be no cumulative impacts associated with the proposed project. As such, the effects on human beings as a result of the proposed project would be less than significant.

I. Aesthetics

California Department of Transportation (Caltrans). 2019. *Scenic Highways*. Available: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.

II. Air Quality

SDAPCD 20201. *Attainment Status*. Available: <https://www.sdapcd.org/content/sdc/apcd/en/air-quality-planning/attainment-status.html>. Accessed: August 4, 2021.

III. Agricultural and Forestry Resources

California Department of Conservation. 2020. *California Important Farmland 1984–2018*. Available: <https://maps.conservation.ca.gov/dlrp/ciftimeseries/>.

IV. Biological Resources

ICF. 2022. *Biological Resources Letter Report for the Otay Water District Trestle Bridge Demolition Project*.

V. Cultural Resources

TBP

VII. Geology, Soils, and Paleontological Resources

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CARB. 2017.

California's 2017 Climate Change Scoping Plan. Available:

https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf?utm_medium=email&utm_source=govdelivery. Accessed August 2021.

County of San Diego. 2018.

<https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/cap/publicreviewdocuments/PostBOSDocs/San%20Diego%20County%20Final%20CAP.pdf>

IX. Hazards and Hazardous Materials

Airport Land Use Commission. 2014. *Brown Field Municipal Airport Land Use Compatibility Plan*.

Approved December 20, 2010. Available:

https://www.san.org/DesktopModules/Bring2mind/DMX/API/Entries/Download?Command=Core_Download&EntryId=2976&language=en-US&PortalId=0&TabId=225. Accessed: December 28, 2020.

CAL Fire. 2020. *Official Very High Fire Hazard Severity Zone Map*. Available:

<https://egis.fire.ca.gov/FHSZ/>. Accessed: December 28, 2020.

Department of Toxic Substances Control (DTSC). 2020. EnviroStor Database. Available:

<https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=lower+otay+lake>. Accessed: December 28, 2020.

XII. Land Use

County of San Diego. 2011. *General Plan*. Available:

<https://www.sandiegocounty.gov/pds/generalplan.html>. Accessed: December 29, 2020.

XII. Mineral Resources

County of San Diego. 2011a. *General Plan, Conservation and Open Space Element, Figure C-4*.

Available:

<https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/ConservationandOpenSpace.pdf>.

County of San Diego. 2011b. County of San Diego General Plan Update, Environmental Impact Report. Available

https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FIR_2.10_-_Minerals_2011.pdf.

XIII. Noise

County of San Diego. 2020. *Find a Park*. Available:

<https://www.sdparks.org/content/sdparks/en/parklist.html>

Airport Land Use Commission. 2014. *Brown Field Municipal Airport Land Use Compatibility Plan*. Approved December 20, 2010. Available: https://www.san.org/DesktopModules/Bring2mind/DMX/API/Entries/Download?Command=Core_Download&EntryId=2976&language=en-US&PortalId=0&TabId=225.

XVII. Transportation

California Department of Transportation (Caltrans). 2014. *California Manual on Uniform Traffic Control Devices*. Available: <https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/ca-mutcd/rev-5/camutcd2014-rev5-a11y.pdf>.

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County of San Diego. 2020. *Transportation Study Guidelines*. Online: <https://www.sandiegocounty.gov/content/dam/sdc/pds/SB743/COSD%20TSG%20FINAL.pdf>

XVIII. Tribal Cultural Resources

No tribes have requested ongoing consultation pursuant to AB52.

XX. Wildfire

California Department of Forestry and Fire Protection. 2020. *California Fire Hazard Severity Zone Viewer*. Available at: <https://egis.fire.ca.gov/FHSZ/>.

County of San Diego. 2018. *San Diego County Emergency Operations Plan*. Available: https://www.sandiegocounty.gov/content/sdc/oes/emergency_management/oes_jl_oparea.html.

Biological Resources Letter Report



August 24, 2022

Ms. Lisa Coburn-Boyd
Otay Water District
2554 Sweetwater Springs Boulevard
Spring Valley, CA 91978

Subject: Biological Resources Letter Report for the Otay Water District Trestle Bridge Demolition Project

Dear Ms. Coburn-Boyd:

Otay Water District (District) proposes the Trestle Bridge Demolition Project (proposed project) to demolish an existing trestle bridge that currently carries an abandoned waterline over the Otay River. This biological resources letter report provides the existing conditions of the vicinity, analyzes potential effects on sensitive biological resources associated with the removal of the trestle bridge, and recommends measures to avoid impacts or reduce the significance of potential impacts. Portions of this Biological Letter Report are taken from ICF's 2014 *Summary of Biological Findings for the Abandoned Waterline and Trestle Bridge Project* letter report (ICF 2014).

Project Description

The proposed project consists of the demolition of a steel trestle and removal of an abandoned 24-inch water pipeline in the Otay Mesa area. The pipeline was replaced by the Central Area and Otay Mesa Interconnection Pipeline in 2001. The trestle also carries an abandoned high-pressure gas line that supplied the 870-1 Pump Station, which had prevented the trestle from being demolished previously. San Diego Gas & Electric (SDG&E) abandoned this gas line in 2017 and replaced it with a feed from the south. Since the existing water pipeline is no longer in service, the District intends to remove the trestle and pipeline to address liability concerns.

The total length of the pipeline and bridge to be removed is approximately 400 linear feet. The bridge portion over the river is suspended about 40–50 feet above the riverbed and is approximately 170 linear feet of the total length.

Demolition of the trestle bridge and water line is anticipated to occur over a 4-month period. Any construction activities would occur only during the permitted daytime hours of 7:00 a.m. to 7:00 p.m. as specified by the County of San Diego municipal code (Section 36.408). Construction of the proposed project would occur in one phase and include the following activities:

- Mobilize to site/improve access roads
- Cap utilities
- Demolish water line and trestle bridge
- Removal of material from the site

South of the trestle bridge, approximately 900 feet of access road would be improved and widened to 12 feet, for an area of 10,800 square feet (0.25 acre). The first 80 feet of the road would need to be realigned to meet construction vehicle requirements, necessitating clearing and grading work for this segment. North of the trestle bridge, most of the existing roads would be wide enough to accommodate construction equipment. However, approximately 200 feet from the end of the road to the exposed piping would need to be widened to 10 feet, for an area of 2,000 square feet.

The work area at the bridge site on the northern and southern sides of the trestle would be approximately 0.25 acre. This acreage does not include staging areas. Three staging areas would be required, one on the northern side of the bridge and two on the southern side, for a total of 0.15 acre. Staging areas would consist of land that is already disturbed.

Equipment for construction would include a 90-ton crane, a Bobcat skid-steer loader, dump trucks, and a backhoe or excavator (Caterpillar 345C L Hydraulic Excavator or smaller) for demolition and earthwork to prepare the project site.

Project Location

The proposed project is in the unincorporated community of Otay Mesa, San Diego County (Figure 1—all figures are presented in Attachment A). The site is situated approximately 0.5 mile south of the Lower Otay Lake, northwest of the George F. Bailey Detention Facility, and north of the OWD Roll Reservoir. The site is within the Otay Mesa U.S. Geological Survey (USGS) 7.5-minute quadrangle map (Figure 2).

Environmental and Regulatory Setting

The proposed project is located within the limits of the San Diego Multiple Species Conservation Program (MSCP) County Subarea Plan (South County Plan) South County Segment, although the District is not a signatory to the Plan. The trestle removal site and most of the length of the access roads are within Assessor's Parcel Number (APN) 6441001900, which is owned by the County of San Diego and managed as part of the County Lakes Regional Park. APN 6441001900 was designated in the County Subarea Plan as a "Take Authorized" area. This designation is for lands whose impacts were mitigated with the establishment of Hardline Preserves in South County Segment and for which no additional mitigation is required for impacts on covered species or their habitats. Although activities conducted by the District are not covered by the MSCP, the Take Authorized designation shows that activities within this parcel do not have an effect on hardline preserve or biological resource core areas.

Surrounding lands to the east and west support undeveloped lands with mostly native habitat. Nearby, the Otay Water Treatment Plant and the Otay Lakes County Park lie to the north, the Otay Open Space Preserve to the east, and the George F. Bailey Detention Center and Richard J. Donovan Correctional Facility to the south. The Otay River traverses the Biological Study Area (BSA) from east to west and crosses beneath the trestle bridge that is the focus of this proposed project. This portion of the Otay River supports riparian vegetation. The BSA ranges in elevation from 260 feet above mean sea level (AMSL) at its lowest point in the bed of the Otay River to 380 feet AMSL at its highest point. No other potential waterways are present in the BSA.

Four soil types, as defined by the U.S. Department of Agriculture (USDA), are mapped within the proposed project (USDA 1973; USDA/NRCS 2020). These include San Miguel–Exchequer rocky silt loams, Huerhuero loam, riverwash, and terrace escarpments:

- San Miguel-Exchequer rocky silt loams is about 50 percent San Miguel silt loam and 40 percent Exchequer silt loam. Soils in the San Miguel series consist of well-drained shallow to moderately deep silt loams that have a clay subsoil. Soils in the Exchequer series consist of shallow and very shallow, well-drained silt loams. San Miguel-Exchequer complex occurs on mountainous uplands. In the BSA, this soil type occurs north of the Otay River and in the southeastern portion of the BSA.
- Huerhuero loams are moderately well drained soils with a clay subsoil, developed from sandy marine sediments. They occur from 10 to 400 feet AMSL on marine terraces.
- Riverwash typically occurs in intermittent stream channels. The material is typically sandy, gravelly, or cobbly. In the BSA, this soil type occurs in association with the Otay River and its banks.
- Terrace escarpments consists of steep to very steep escarpments and escarpment-like landscapes. The terrace escarpments typically occur on the nearly even fronts of terraces or alluvial fans.

Riverwash is listed as a hydric soil type and often supports wetland and riparian communities, as well as jurisdictional waterways jurisdictional to US Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and/or California Department of Fish and Wildlife (CDFW). No work is proposed within riparian areas mapped as Riverwash.

San Miguel-Exchequer and Huerhuero loams are two of the main soil types in San Diego County that historically supported vernal pool complexes (Bauder and McMillin 1998). Therefore, a vernal pool habitat assessment was conducted, as described in the following sections.

Survey Methods

The BSA for the proposed project consisted of 1) a 50-foot buffer (100-foot survey corridor) along all proposed road improvements, including turn-around areas; and 2) a 100-foot buffer (200-foot survey corridor) of the existing trestle bridge and aboveground pipe sections (Figure 3). Prior to conducting field surveys of the BSA, ICF biologists reviewed the *Summary of Biological Findings for the Abandoned Waterline and Trestle Bridge Project* (ICF 2014) and added the geographic information system (GIS) data collected in 2014 to an ESRI Collector map. These GIS data were verified and refined as needed.

Literature and Records Search

A review of the following public records was conducted to establish the existence or potential occurrence of sensitive biological resources (e.g., plant or animal species) or water resources within the study area.

- CDFW California Natural Diversity Data Base (CNDDB) (CDFW 2022)

- California Native Plant Society's (CNPS) Online Inventory of Rare and Endangered Plants, 8th Edition (CNPS 2022)
- San Diego Plant Atlas (San Diego Natural History Museum [SDNHM] 2022)
- U.S. Fish and Wildlife Service (USFWS) Carlsbad Fish and Wildlife Office species occurrence data (USFWS 2021)
- USFWS National Wetlands Inventory (NWI) database (USFWS 2020)
- USDA Natural Resources Conservation Service (NRCS) soil survey maps (USDA/NRCS 2020)

The results of the literature review were used to inform which habitat assessments and focused surveys for sensitive species and sensitive vegetation communities would be conducted.

Vegetation Mapping and Habitat Assessment

Vegetation mapping and a habitat assessment within the BSA was conducted on April 16 and April 27, 2020, by walking meandering transects and from selected vantage points that allowed 100 percent visual coverage of the BSA. Vegetation communities were classified based on the dominant and characteristic plant species, in accordance with the Holland classification system (1986), as modified by Oberbauer et al. (2008). Vegetation mapping was completed with Apple iPad Air devices using the ESRI Collector application. Digital aerial imagery for the BSA was loaded into ESRI Collector, which allowed for the digital mapping of vegetation polygons over aerial imagery in the field. The site was assessed for potential to support special status plant and animal species, including, but not limited to, state and federally listed endangered and threatened species, CDFW Species of Special Concern (SSC), and plants listed in the California Rare Plant Ranking (CRPR).

All plant and wildlife species observed during vegetation mapping were identified, and habitat was assessed for potential to support sensitive species. Plant species were identified to the species level (including subspecies or variety, as applicable) using *The Jepson Manual Vascular Plants of California Second Edition* (Baldwin et al. 2012) and recorded in a species compendium. Plant common names followed the *Checklist of The Vascular Plants of San Diego County Fifth Edition* (Rebman and Simpson 2014) if the common names were not provided in Baldwin et al. (2012).

Because of the presence of vernal pool-associated soils and existing vernal pool preserves in the vicinity, the BSA was assessed for potential for vernal pools and other seasonally-inundated depressions.

Special Status Plant Surveys

ICF botanists conducted rare plant surveys in the BSA on April 16 and April 27, 2020, following methodology in *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2018) and the *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants* (USFWS 2000). A total of 7.98 acres were included in the BSA and were surveyed with meandering transects through suitable habitat. All plant species observed were noted, and plants that could not be identified in the field were identified later using taxonomic keys, including Baldwin et al. (2012).

Quino Checkerspot Butterfly Habitat Assessment

Federally listed endangered Quino checkerspot butterfly (*Euphydryas editha quino*; QCB) is known from the local vicinity. The proposed project occurs within designated critical habitat, as well as within the *Recommended Quino Survey Area* (USFWS 2014). QCB is not a covered species under the South County Plan (County 1997).

ICF senior biologist Brian Lohstroh conducted a habitat assessment for QCB host plants on March 3, 2022. Mr. Lohstroh maintains a USFWS Recovery Permit (TE-063608-6) to conduct flight season surveys for QCB and is experienced in identifying QCB host plants. Mr. Lohstroh mapped point and polygon locations of QCB host plant dot-seed plantain (*Plantago erecta*) within the BSA. The habitat assessment was conducted in early March 2022, when host plants were at the height of bloom and most easily observable. As QCB are known from the vicinity (USFWS 2021), any host plants are considered occupied habitat, so no focused flight season surveys were conducted to attempt to show absence of the species.

Fairy Shrimp Survey

ICF conducted a dry season survey of all potentially suitable fairy shrimp habitat within the BSA in 2022. Survey methodology follows the *Survey Guidelines for the Listed Large Branchiopods* (USFWS 2017). ICF senior biologist Brian Lohstroh (Permit# TE-063608-6) collected soil samples for the dry season survey on May 19, 2022. Soil samples were collected from three road ruts when the depressions were dry and processed by ICF fairy shrimp biologist and USFWS permitted cyst-identifier Dale Ritenour (Permit# TE-58888A-2.1), in accordance with USFWS 2017.

Bat Survey

SDNHM bat biologist Drew Stokes and associate biologist Jessica Ryan conducted a visual assessment of the structure and the adjacent rocky cliffs and outcrops on August 26, 2020. SDNHM determined that although the structure itself was not suitable for roosting bats, the adjacent cliffs and rocky outcrops did have potential to support roosting bats. Therefore, SDNHM conducted a visual exit-count survey, combined with an Anabat Walkabout Active Bat Detector to help with species' call identification for any bats observed exiting the adjacent rocky habitat.

Existing Conditions

Habitat and Vegetation Communities

A total of six vegetation communities and land cover types were mapped within the BSA, as summarized in Table 1 and shown on Figure 3 (Attachment A). Bedrock is called out separately from the surrounding vegetation community types because rock outcrops are a unique physical feature that might have unusual biological value. A complete list of all plant species detected in the BSA is provided in Appendix B, *Plant Species Observed*.

Table 1. Vegetation Communities within the BSA

Oberbauer Code	Vegetation Community Name	Area (Acres)
11300	Disturbed Habitat	0.76
32500	Diegan Coastal Sage Scrub	4.63
42200	Non-native Grassland	0.80
63320	Restored Southern Willow Scrub	0.08
	Southern Willow Scrub	0.66
79100	Eucalyptus Woodland	0.31
N/A	Bedrock	0.75
Total		7.98*

*= sum of values may not equal site total because of rounding

Diegan Coastal Sage Scrub

Diegan coastal sage scrub is a vegetation community typically characterized by low, woody subshrubs that grow up to 3 feet in height. Plant species detected within the Diegan coastal sage scrub in the BSA include California sagebrush (*Artemisia californica*), leafy California buckwheat (*Eriogonum fasciculatum* var. *foliolosum*), San Diego County viguiera (*Viguiera laciniata*), common peak rush-rose (*Crocanthemum scoparium* var. *vulgare*), and ladies' fingers (*Dudleya edulis*). A few individuals of San Diego barrel cactus (*Ferocactus viridescens*) occur within the BSA.

The Diegan coastal sage scrub vegetation community occurs throughout the entire BSA. This habitat may provide suitable nesting habitat for a variety of bird species, including breeding species protected by the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (FGC), and has the potential to support federally or state-listed species protected by the federal Endangered Species Act (ESA), including federally threatened and SSC coastal California gnatcatcher (*Polioptila californica californica*) and the federally endangered QCB.

Southern Willow Scrub

Southern willow scrub is described as dense, broad-leafed, winter-deciduous riparian thickets dominated by several willow species, mule fat (*Baccharis salicifolia*), and occasionally western cottonwood (*Populus fremontii*). Most stands are too dense to allow much understory development. Plant species detected within the disturbed southern willow scrub in the BSA included Goodding's black willow (*Salix gooddingii*), cattail (*Typha* sp.), Mexican fan palm (*Washingtonia robusta*), and giant reed (*Arundo donax*). This vegetation community occurs in association with the Otay River. Southern willow scrub in the BSA supports federally and state-endangered least Bell's vireo (*Vireo bellii pusillus*) and provides suitable nesting habitat for a variety of bird species protected by the MBTA and FGC.

Non-Native Grassland

Non-native grassland habitat is dominated by annual grasses, including bromes (*Bromus diandrus*, *B. hordeaceus*, *B. rubens*), wild oat (*Avena fatua* and *A. barbata*), rat-tail six-weeks grass (*Festuca myuros*), and schismus (*Schismus arabicus* and *S. barbatus*), and can have showy, flowering natives and nonnatives, such as filarees (*Erodium cicutarium* and *E. botrys*), mustards (*Brassica nigra* and

Hirschfeldia incana), tarplant (*Deinandra fasciculatum*), and lupines (*Lupinus bicolor* and *L. succulentus*). Within the BSA, this vegetation community occurs north of the Otay River.

Disturbed Habitat

Disturbed habitat consists of areas supporting densely to sparsely distributed nonnative vegetation. In the BSA, plants occurring within disturbed habitat included short-pod mustard (*Hirschfeldia incana*) and natal grass (*Melinis repens* ssp. *repens*), which occur on steep slopes. Disturbed areas do not typically support listed species due to lack of suitable habitat.

Eucalyptus Woodland

Eucalyptus woodlands are dominated by gum trees (*Eucalyptus* spp.) with various understory development, from bare to limited shrub cover to well-developed herbaceous and shrub understory. Typically, there is a lack of species diversity and density due to chemical and physical properties of gum tree leaf and bark litter. Within the BSA, this habitat is dominated by silver dollar gum (*Eucalyptus polyanthemos*), which occurs north of the Otay River.

Bedrock

Areas of rock associated with the canyon walls were classified as *bedrock*. These areas are mostly devoid of vegetation due to the absence of a soil substratum and their steepness. These areas may provide suitable nesting habitat for birds and roosting habitat for bats.

Special Status Species Occurrence and Discussion

This section discusses special status species observed or detected within the BSA, as well as special-status species with potential to occur. A *special status species* is one that is listed by federal or state agencies as threatened or endangered or candidate; listed as a California SSC; listed in the CRPR; or could meet the CEQA Section 15380 definition of rare, threatened, or endangered.

A complete list of all plant species detected is presented in Appendix B. A complete list of all animal species detected is presented in Appendix C, *Animal Species Observed*.

Special Status Plant Species

Six CRPR-listed plant species were observed within the BSA and are described below. All special status plants are shown on Figure 4 (Appendix A). Plant species were assessed for potential to occur within the BSA, and results are presented in Appendix D, *Special Status Plant and Animal Species Potential to Occur*. After rare plant surveys were conducted, any other special status plant species known from the region and vicinity were determined to have moderate or less potential to occur within the BSA.

San Diego Barrel Cactus (*Ferocactus viridescens*) CRPR 2B.1

The optimal habitat for San Diego barrel cactus is Diegan sage scrub hillsides, often at the crest of slopes and growing in cobbles (Reiser 2001). It is occasionally found on the periphery of vernal pools and mima mound topography at Otay Mesa, sometimes in considerable numbers (Reiser

2001). The blooming period for this species is from May through June. In the BSA, approximately 34 individuals were detected in Diegan coastal sage scrub north of the Otay River (Figure 4).

San Diego County Viguiera (*Viguiera laciniata*) CRPR 4.2

San Diego County viguiera is typically found in arid Diegan coastal sage scrub and is often a co-dominant of the shrub community where it occurs (Reiser 2001). The blooming period for this species is from February to June. In the BSA, approximately 242 individuals were observed, primarily on Diegan coastal sage scrub north of the Otay River, with scattered individuals in Diegan coastal sage scrub south of the Otay River (Figure 4). San Diego County viguiera is a species of restricted distribution (southern San Diego County and northern Baja California) but is often a codominant species in Diegan coastal sage scrub within its range.

San Diego Goldenstar (*Bloomeria clevelandii*) CRPR 1B.1

San Diego goldenstar is a bulbiferous perennial in the Themidaceae family primarily restricted in distribution to southwestern San Diego County. It occurs on clay soils within chaparral, coastal sage scrub, grassland, and vernal pool habitats. The blooming period for this species is from April to May. In the BSA, hundreds of individuals were found south of the Otay River, scattered within coastal sage scrub and nonnative grassland habitats (Figure 4).

Singlewhorl Burrobush (*Ambrosia monogyra*) CRPR 2B.2

Singlewhorl burrobush occurs on sandy soils in washes in chaparral and Sonoran desert scrub habitats. The blooming period for this species is August to November. This species is more common in Sonoran desert washes, but occurs sporadically in a few washes in extreme southwestern San Diego County (SDNHM 2022). A few individuals of this species were observed near the southern willow scrub habitat in the southern portion of the BSA.

Small-Flowered Microseris (*Microseris douglasii* ssp. *platycarpa*) CRPR 4.2

Small-flowered microseris is a small annual in the Compositaceae family found on clay soils in cismontane woodland, coastal sage scrub, vernal pool peripheries, and grassland habitats. The blooming period for this species is March to May. In the BSA, approximately 200 individuals were found south of the Otay River in many scattered locations.

Tecate Cypress (*Hesperocyparis forbesii*) CRPR 1B.1

Tecate cypress is a large shrub/small tree which occurs on clay, gabbroic or metavolcanics soils within closed-cone coniferous forest and chaparral habitat. Two individuals were detected at the very western portion of the BSA, along the existing access road.

Special Status Wildlife Species

This section contains information about sensitive and special status wildlife species that were observed or determined to have a high potential to utilize the BSA.

Quino Checkerspot Butterfly (*Euphydryas editha quino*), Federally Endangered

Federally listed QCB are known from the vicinity of the BSA (USFWS 2021). Adult QCB were observed in the vernal pool preserve to the northwest of the BSA in 2019 (Figure 6), the hilltop immediately east of the developed area of Otay Lakes County Park, and the Roll Reservoir vicinity south of the BSA. QCB require larval host plants, such as dot-seed plantain (*Plantago erecta*), purple owl's clover (*Castilleja exserta*), and purple Chinese houses (*Collinsia concolor*), to complete their life cycle. The USFWS generally considers any host plants within 1 kilometer of known QCB populations to be occupied habitat. The entirety of the BSA is within 1 kilometer of known populations of QCB. Therefore, any host plants within the project would be considered occupied habitat.

QCB host plant dot-seed plantain was observed in the BSA in and adjacent to the potential impact area during a focused QCB host plant habitat assessment in March 2022 (Figure 6).

Sensitive Reptile Species

The BSA contains native, naturalized, and open habitat suitable for supporting sensitive reptile species, including 4.63 acres of Diegan coastal sage scrub, 0.75 acre of bedrock, and 0.80 acre of nonnative grassland (Table 1). No sensitive reptiles were incidentally observed during other surveys; therefore, no focused surveys were conducted for sensitive reptiles. Sensitive reptile species, including red-diamond rattlesnake (*Crotalus ruber*; SSC), Blainville's horned lizard (*Phrynosoma blainvillii*; SSC), and coastal western whiptail (*Aspidocelis tigris stejnegeri*; SSC), have potential to utilize upland habitats in the BSA.

Two-striped gartersnake (*Thamnophis hammondi*; SSC) is a primarily aquatic species with high potential to utilize the riparian areas in the Otay River under the trestle bridge in the BSA.

Least Bell's Vireo (*Vireo bellii pusillus*), Federally Endangered, California Endangered

Least Bell's vireo (*Vireo bellii pusillus*) is a federally and state-listed endangered migratory songbird. Least Bell's vireo is known as a summer breeding species in suitable habitat in the Otay River valley (Unitt 2004). Male least Bell's vireo typically reappear in late March to early April in coastal San Diego County, with females following several weeks later (Unitt 2004). During the biological survey in 2014, a least Bell's vireo was observed in the Otay River. Suitable nesting habitat for least Bell's vireo exists within southern willow scrub vegetation within the Otay River, beneath the trestle bridge. Least Bell's vireo likely breeds in the BSA during the summer, but is absent from the BSA annually from approximately September through March. The disturbed pull-out at the southwestern end of the potential impact area is mapped as southern willow scrub-restoration, is primarily vegetated with small goldenbush (*Isocoma menziesii*), and is not suitable breeding habitat for riparian birds, including least Bell's vireo. No designated critical habitat for least Bell's vireo exists within the BSA. All riparian habitat under the trestle bridge within the BSA would be considered vireo-occupied habitat during the breeding season (March 15–September 15, annually).

Other Riparian Birds

Other California SSC summer breeding birds with high potential to utilize the BSA include yellow warbler (*Dendroica petechia*) and yellow-breasted chat (*Icteria virens*); suitable habitat within the BSA is considered occupied by yellow warbler and yellow-breasted chat during the summer. All of

these birds are neotropical migrants that breed in San Diego County during the summer, but are absent in the winter.

Southwestern willow flycatcher (*Empidonax traillii extimus*) is a federally endangered neotropical migrant that was historically known to nest in the Otay River Valley (Unitt 2004), but the BSA does not support riparian forest with suitable complexity to support this species. Because the BSA does not support suitable habitat, this species is considered absent, and the project has no potential to impact this species.

California Gnatcatcher (*Poliophtila californica californica*) Federally Threatened, SSC

The BSA contains 4.63 acres of Diegan coastal sage scrub suitable as breeding habitat for coastal California gnatcatcher. During 2020, three California gnatcatchers were observed within the 4.63 acres of Diegan coastal sage scrub habitat observed in the BSA. Diegan coastal sage scrub is potential breeding habitat for California gnatcatcher. No designated critical habitat for California gnatcatcher exists within the BSA.

Raptors

The BSA supports suitable nesting habitat for tree-, shrub-, and ground-nesting raptors. The bedrock exposures do not support suitable cliff faces for cliff-nesting raptor species. Incidental observations of raptor species in the BSA included a Cooper's hawk (*Accipiter cooperii*; CDFW watch list), four white-tailed kites (*Elanus leucurus*; California fully protected) in the eucalyptus grove west of the trestles, and a northern harrier (*Circus hudsonius*; SSC) flying over the slope north of the structure (Figure 5). All of these species could nest in the Otay River Valley in the vicinity of the BSA.

Special status Wildlife Species Determined Absent

This section discusses highly sensitive wildlife species with potential to occur in the vicinity but which were determined to be absent from the BSA. Other sensitive species determined to have moderate or lower potential to occur in the BSA are discussed in Appendix D.

Fairy Shrimp

Federally-listed endangered San Diego fairy shrimp (*Branchinecta sandiegonensis*) are known to occur within vernal pool preserves in the vicinity of the BSA (USFWS 2021). Three road ruts potentially suitable as habitat for San Diego fairy shrimp were observed in these access roads the BSA (Figure 5). The sampled road ruts are shallow and isolated features, which made them unlikely to support fairy shrimp. The sampled ruts were assessed to have low potential to support San Diego fairy shrimp prior to sampling, but this dry season survey was conducted to provide information on potential occupancy. No fairy shrimp cysts were observed in soil samples from any of the three sampled depressions in the BSA during a dry season focused survey in 2022; no cysts of San Diego fairy shrimp or any other large branchiopods were observed (Appendix E, *2022 Dry Season Fairy Shrimp Survey for Trestle Bridge Removal and High Head Pump Station*).

San Diego fairy shrimp are known from vernal pool preserves in the vicinity and large basins on terraces below, in the Otay River Valley, so the potential for them to occur was not discounted. In the Otay Mesa region, fairy shrimp are frequently found within road ruts because mud carried on vehicles can move cysts and introduce the species into new habitat; there is also some potential for

cysts to be moved by waterfowl, shorebirds, or other wildlife. The vernal pool preserves in the vicinity of these two projects are fenced, which vastly reduces potential for vehicular transmission from vernal pools into road ruts within the BSA. Because of the lack of cysts in these ruts, the ruts are determined to not support San Diego fairy shrimp.

Bats

No sensitive bat species were observed within rock features in the BSA during a survey by SDNHM bat biologist Drew Stokes in 2020. Within the BSA, suitable habitat for cave and rock nesting bat species included two fractures in rocks: 1) a large, horizontal fracture (approximately 5-feet long and 5 feet above the northern end of the structure in the rocky habitat, with a southwestern-facing aspect; and 2) a large diagonal fracture (with a series of fractures branching from it) at the southern end of the structure in a steep vertical cliff with a northwestern-facing aspect. Just after sunset, several small bats were observed, identified as canyon bats (*Parastrellus hesperus*), which are rock-crevice dwellers that typically roost solitarily, but are sometimes found in small colonies. Using a bat call detector, SDNHM also detected several Mexican free-tailed bats (*Tadarida brasiliensis*) and two western small-footed myotis (*Myotis ciliolabrum*). No bats were observed exiting from any of the fractures or rocky habitat near the structure. SDNHM concluded that there were no bat colonies in or directly adjacent to the structure.

Wetlands

Otay River under the BSA is assumed to be a state jurisdictional wetland and has potential to have federally protected wetlands within the riparian area. The trestle pipeline would be removed by crane; no work would be conducted within the Otay River. No vegetation would be removed, and no deposition would occur into any potential wetlands in the Otay River. Because no work would occur in the Otay River, a formal jurisdictional delineation was not considered to be necessary and was not conducted. No other potentially jurisdictional drainages were present in the BSA.

Wildlife Movement

Although the parcel the trestle bridge is in a parcel designated as Take Authorized under the MSCP (County 1997) and is considered already mitigated for by establishment of the MSCP preserve system, the parcel and the surrounding lands are generally either undeveloped or designated open space. This open space allows for open movement of wildlife. Riparian corridors are often used for movement of medium to large animals, such as bobcat (*Lynx rufus*), cougar (*Puma concolor*), and mule deer (*Odocoileus hemionus*), because of the presence of cover and water and because riparian areas are often the only undeveloped areas remaining in otherwise-developed landscapes. The trestle bridge spans the Otay River and could serve as a movement corridor. However, the open habitat around the BSA does not constrain wildlife movement to the riparian corridor, so wildlife are free to move freely in the environment.

Effects Analysis

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

Less than significant with mitigation incorporated.

Special Status Plants

Four special-status plant species were observed within the BSA: San Diego barrel cactus, San Diego goldenstar, Tecate cypress, and singlewhorl burrobush. The project has potential to affect these CRPR 1 and CRPR 2 species. Impacts on individuals of any of these species would be potentially significant; individual species are discussed below.

A few individuals of Tecate cypress and singlewhorl burrobush are present in and adjacent to the potential impact area. Impacts on these large shrubs would be avoided through implementation of Avoidance and Minimization Measure (AMM)-BIO-1, *Biological Preconstruction Survey*, and AMM-BIO-2, *Biological Monitoring* (below). Within implementation of these avoidance measures, there would be *no impact* on these species.

Numerous individual San Diego barrel cactus are present in the potential impact area on the northern side of Otay River. These individuals are primarily scattered on bedrock cliffs. Impacts on these cactus would be avoided through implementation of AMM-BIO-1 and AMM-BIO-2. With implementation of these avoidance measures, there would be *no impact* on San Diego barrel cactus.

Populations of San Diego goldenstar are present in the BSA, adjacent to the potential impact area. Impacts on San Diego goldenstar would be avoided through implementation of AMM-BIO-1 and AMM-BIO-2. Within implementation of these avoidance measures, there would be *no impact* on San Diego goldenstar.

Two CRPR 4 (species of limited distribution) species were observed within the BSA: San Diego County viguiera and small-flowered microseris. These species are not considered to meet the definition of endangered or rare under California Environmental Quality Act (CEQA) Section 15380. Because the project is very limited in its extent and the total number of these species that could be affected, any impacts on individuals of these species would not affect the local long-term survival of the species. Given that San Diego County viguiera and small-flowered microseris are not considered special-status species at this location, any impacts on these species *would not be an impact* on a sensitive species.

Special Status Animals

Riparian Bird Species

Sensitive neotropical migrant riparian bird species, including least Bell's vireo, yellow warbler, and yellow-breasted chat, have potential to utilize habitat under the proposed project as breeding habitat. Impacts on suitable habitat would be a significant impact on these species. The project is designed to work from a crane from the canyon sides and would not enter or affect the sensitive

riparian habitat in the Otay River below. This aspect of the project would have *no impact* on riparian bird habitat.

The disturbed pull-out at the southwestern end of the potential impact area was mapped as southern willow scrub–restoration but is primarily vegetated with small goldenbush and is not currently suitable breeding habitat for riparian birds. *This area will be used for temporary staging of equipment; it will not be graded and vegetation would not be removed.* Because this area is not yet habitat for riparian birds, the project would not result in an impact on suitable breeding habitat for riparian bird species and any direct impacts on vegetation in this area would have *no impact* on riparian birds.

Work adjacent to or over riparian habitat in the Otay River during the breeding season could result in noise and other indirect disturbance impacts on the breeding success of sensitive riparian bird species through disturbance of activity patterns, stress, and distraction, which could lead to reduced nesting success or mortality by predation. These indirect effects, if they occurred during the breeding season would be a potentially significant impact on breeding riparian birds. AMM-BIO-3, *Project Timing*, ensures that project activities would not occur during the breeding season. Therefore, the project would have *no impact* on riparian bird species.

Coastal California Gnatcatcher

Coastal California gnatcatcher is assumed to occupy the 4.63 acre of Diegan coastal scrub present in the BSA. The project has the potential to temporarily disturb up to 0.36 acre of Diegan coastal sage scrub habitat on roadside access roads, determined by overlaying the potential impact area over the mapped vegetation communities. The actual temporary impacts may be less than this, because of the imprecision in comparing proposed work areas to vegetation communities mapped on air photos. Any impacts on roadside vegetation would be reduced through implementation of AMM-BIO-2, which would ensure that shrub impacts are minimized.

Project activities during the breeding season could result in direct or indirect effects on nesting coastal California gnatcatcher and would be a potentially significant impact. However, the project is designed to avoid activities during the breeding season. AMM-BIO-3, *Project Timing*, ensures that the project would not occur during the breeding season. Therefore, the project would have no impact on coastal California gnatcatcher.

With implementation of AMM-BIO-2 and AMM-BIO-3, the project would have *no impact* on coastal California gnatcatcher.

Raptors

Sensitive raptor species, including white-tailed kite and northern harrier, have potential to nest within the BSA. The project was designed to be conducted within the winter to avoid any project-related direct or indirect impacts on sensitive raptor species. Additionally, AMM-BIO-3 ensures that the project would not occur during the breeding season. Therefore, the project would have *no impact* on raptor species.

Sensitive Reptiles

Sensitive reptiles species, including red-diamond rattlesnake, coast horned lizard, and coastal western whiptail, have potential to utilize the BSA. The project would have limited temporary

impacts on habitat for these species; disturbance of roadside vegetation would be a less than significant impact. Direct impacts on individuals of these species would be a significant impact. Implementation of AMM-BIO-1 and AMM-BIO-2 would ensure that the project does not have direct impact on these species.

Two-striped gartersnake has high potential to utilize the Otay River in the BSA under the trestle bridge. Removal of the trestle bridge would have no impact on riparian habitat in the Otay River; therefore, the project would have *no impact* on two-striped gartersnake.

Quino Checkerspot Butterfly

QCB is known from the vicinity of the BSA, and all populations of host plants would be considered occupied habitat. Construction of the project during the flight season in proximity to occupied habitat would have potential to affect adult QCB. Implementation of AMM-BIO-3 would ensure that the project would not occur during the flight season of QCB and would have no impact on flying adult species.

The project has potential to affect QCB host plants potentially occupied by larval QCB. Impacts on occupied larval host plants would be a potentially significant impact under CEQA. Implementation of AMM-BIO-1, AMM-BIO-2, and AMM-BIO-3 would ensure the avoidance of potential impacts on QCB and would therefore have *no effect* on QCB.

Bats

A focused habitat assessment and survey for bat species conducted by SDNHM bat biologists in 2020 determined that sensitive bat species were absent from the BSA and that no bat species were utilizing the trestle bridge. Because of bat species absence, the project would have *no effect* on sensitive bat species.

Fairy Shrimp

A protocol-level, dry-season survey was conducted in 2022 by an ICF fairy shrimp biologist in three small road ruts in the BSA. These road ruts were initially assessed to be marginal suitability, and the dry-season soil analysis determined that no fairy shrimp cysts were present in the ruts. Because fairy shrimp are absent from the BSA, and the proposed project would have no impacts on the watersheds of any vernal pools, the proposed project would have *no impact* on listed fairy shrimp.

Avoidance and Minimization Measures

AMM-BIO-1: Biological Preconstruction Survey. Due to the presence of Quino checkerspot butterfly (QCB) host plants and rare plants in the potential impact area, the shoulders of the dirt roads and proposed off-road traverses will be inspected for presence of QCB host plants within 7 days prior to construction. QCB host plants known from the site include dot-seed plantain, purple owl's clover, and purple Chinese houses. Populations of host plants mapped in March 2022 and any newly observed host plants present along road shoulders shall be flagged for avoidance with staking and flagging. If any host plants are present within the proposed off-road travel paths, then the population shall be flagged and shall be avoided; no machinery shall drive over host plant locations at any time of year.

AMM-BIO-2: Biological Monitoring. Due to the presence of Quino checkerspot butterfly (QCB) and its host plants, California gnatcatcher, and sensitive plants in the vicinity of the site, a biological monitor will be onsite full-time during project activities. The Biological Monitor will ensure that equipment is constrained to existing disturbed road and pads to the maximum extent practicable and will avoid flagged sensitive resources. The Biologist will sweep ahead of equipment to ensure that no sensitive reptiles or mammals are affected by vehicle movements. The biologist will ensure that project activities do not affect any QCB host plants, Tecate cypress, singlewhorl burrobush, San Diego barrel cactus, or San Diego goldenstar.

AMM-BIO-3: Project Timing. Sensitive neotropical migrant bird species utilize riparian habitat around the project during the summer, and sensitive resident bird species will breed in the surrounding open space during the breeding season. Quino checkerspot butterfly (QCB) have potential to fly from late February to early May. To avoid any potential impacts on federally listed QCB and listed and sensitive bird species, all work will be conducted within the period of September 15 to February 15.

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

Less than significant impact. The project proposes to remove hard structures from open space and would have no permanent development footprint. The project would have no ongoing operations impacts. Therefore, the project would have no permanent impacts on sensitive natural communities.

The project would have potential for temporary disturbance on sensitive vegetation communities on roadsides and in existing disturbed roadside areas. Sensitive vegetation within the mapped potential impact area includes 0.36 acre of Diegan coastal sage scrub, 0.05 acre of non-native grassland, and 0.08 acre of southern willow scrub (revegetation area) (Table 2).

Table 2. Vegetation Communities within the Potential Impact Area

Oberbauer Code	Vegetation Community Name	Project Impacts (acres)
11300	Disturbed Habitat	0.45
32500	Diegan Coastal Sage Scrub†	0.36
42200	Non-Native Grassland†	0.05
63320	Southern Willow Scrub (restoration)†	0.08
79100	Eucalyptus Woodland	0.04
N/A	Bedrock	0.03
Total		0.99

†= sensitive vegetation community

The actual temporary impacts may be less than the values in Table 2 due to the imprecision in comparing proposed work areas to vegetation communities mapped on air photos. Impacts on roadside vegetation would be reduced through implementation of AMM-BIO-2, which would ensure that equipment is constrained to existing disturbed road and pads to the maximum extent. The small size of the roadside impacts would be a *less than significant impact*.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

No impact. The trestle bridge spans the Otay River, which is potentially jurisdictional to USACE, RWQCB, and CDFW, and which has potential to contain state and federal wetlands. Trestle bridge demolition would be conducted entirely by crane and/or helicopter and would not affect the Otay River below. Therefore, the project would have *no impact* on state or federally protected wetlands.

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?

Less than significant impact. The trestle bridge spans the Otay River, which may serve as a wildlife corridor for native species. The proposed project would not have any direct temporary impacts on habitat within the riparian corridor and would have no permanent impacts; the project would remove a developed structure from the otherwise-undeveloped vicinity and would have no continued operations after removal. Construction work on the project would only be conducted during daytime hours and would have limited temporary impacts on what would be primarily nocturnal movements within the Otay River and surrounding uplands. Therefore, the project would have a *less than significant impact* on wildlife movement.

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

No Impact. No local policies or ordinances protecting biological resources would apply to this project. Therefore, the project would have *no impact* on local policies or ordinances.

f. Would the project conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?

No Impact.

The project does not conflict with any habitat conservation plans. The project is located within the limits of San Diego Multiple Species Conservation Program (MSCP) County of San Diego MSCP Subarea Plan County Subarea Plan ('South County' Plan) South County Segment. The trestle removal site and most of the access roads are located within APN 6441001900, which is owned by County of San Diego and managed as part of the County Lakes Regional Park. APN 6441001900 was designated in the County Subarea Plan as a "Take Authorized" parcel. This designation is for lands whose impacts were mitigated with the establishment of Hardline Preserves in South County Segment, and for which no additional mitigation is required for impacts to covered species or their habitats. While activities conducted by OWD are not covered activities under the MSCP, the Take Authorized designation shows that activities within this parcel do not have an effect on hardline preserve or biological resource core areas.

Conclusion

Through project design features and reasonable Avoidance and Minimization Measures (AMM-BIO-1, AMM-BIO-2, and AMM-BIO-3), the project would have a *less than significant impact* on sensitive biological resources.

If you have any questions regarding the contents of this letter report, please contact Dale Ritenour at (858) 578-8964.

Sincerely,



Dale Ritenour
ICF Senior Biologist

Appendices

Appendix A	Figures 1–5
Appendix B	Plant Species Observed
Appendix C	Wildlife Species Observed
Appendix D	Sensitive Plant and Wildlife Species Potential to Occur Tables
Appendix E	2022 Dry Season Fairy Shrimp Survey for Trestle Bridge Removal and High Head Pump Station References

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Appendix A

Figures

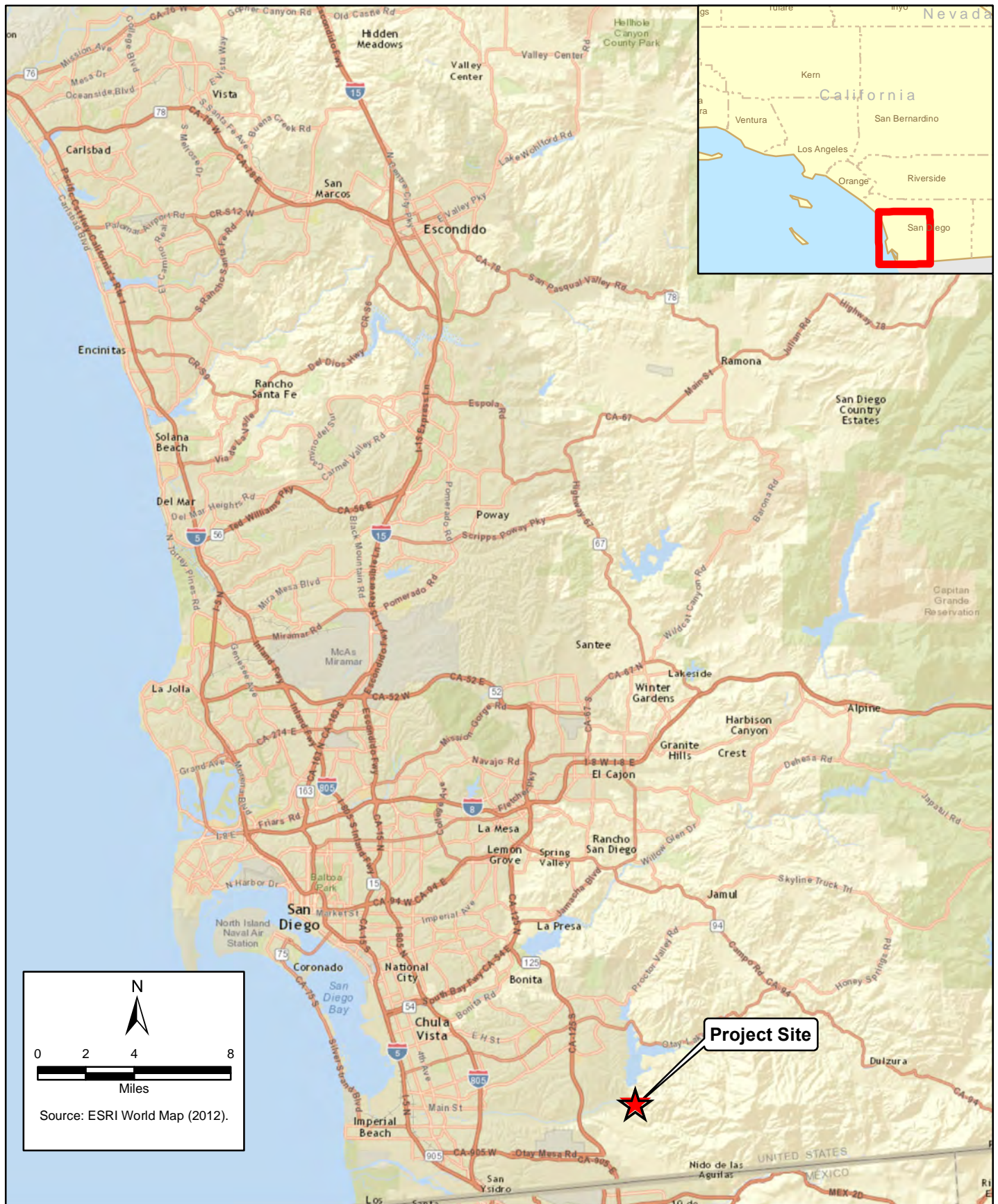


Figure 1: Regional Location
Biological Resources Letter Report
Otay Water District Trestle Bridge and Abandoned Waterline

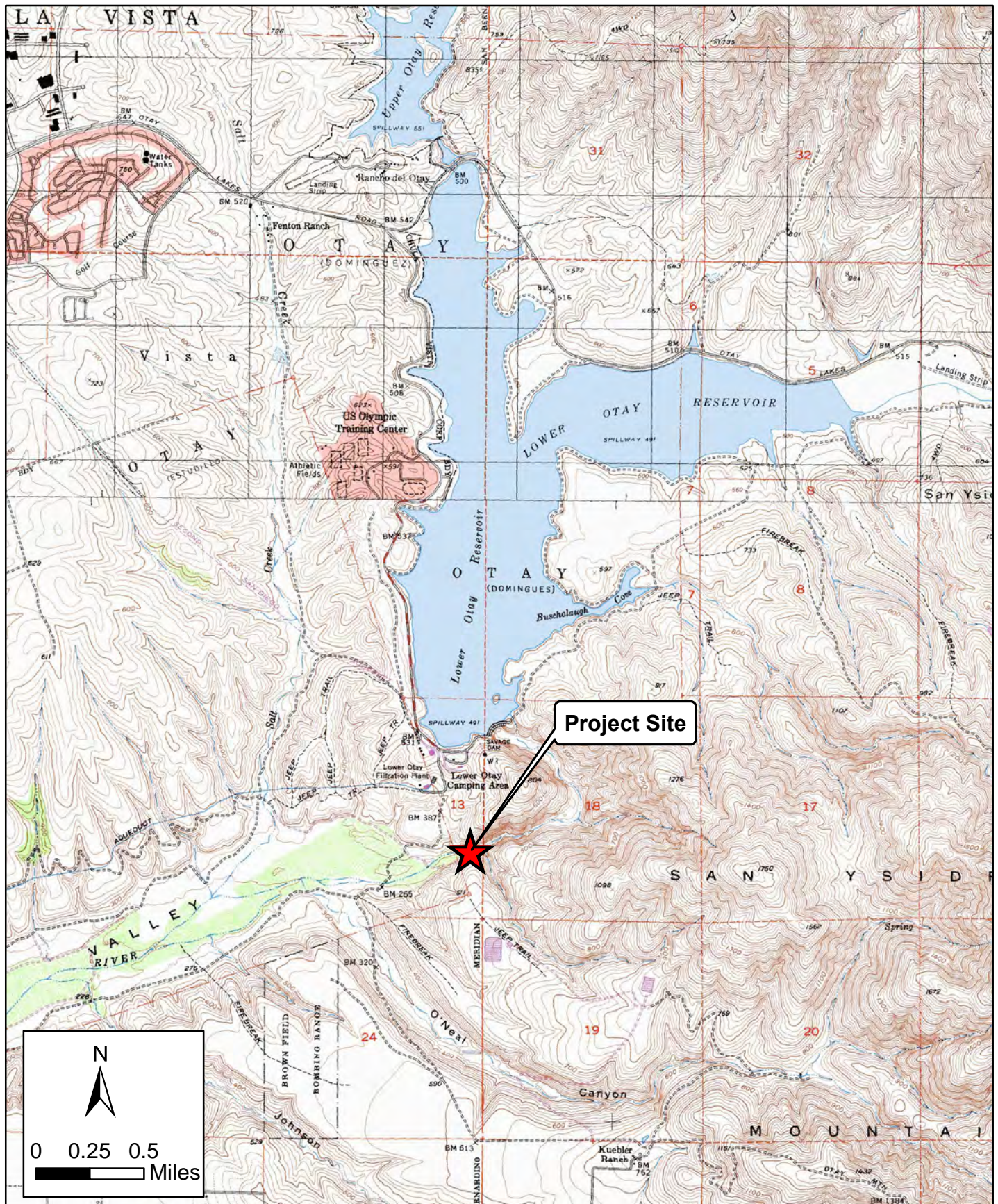
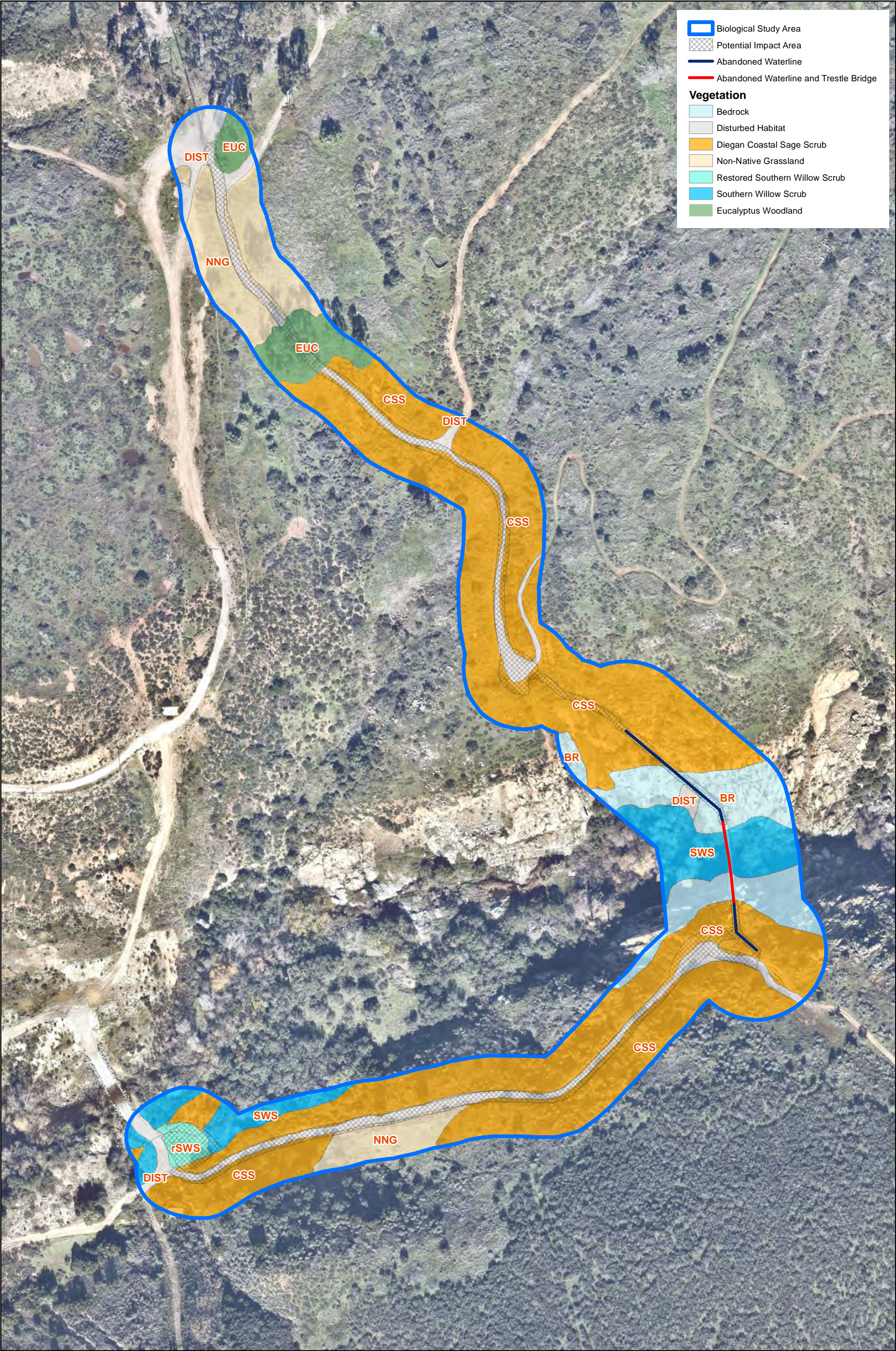


Figure 2: Project Location
Biological Resources Letter Report
Otay Water District Trestle Bridge and Abandoned Waterline





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Figure 3: Vegetation Communities
Biological Resources Letter Report
Otay Trestle Bridge Demolition Project

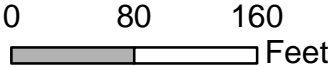
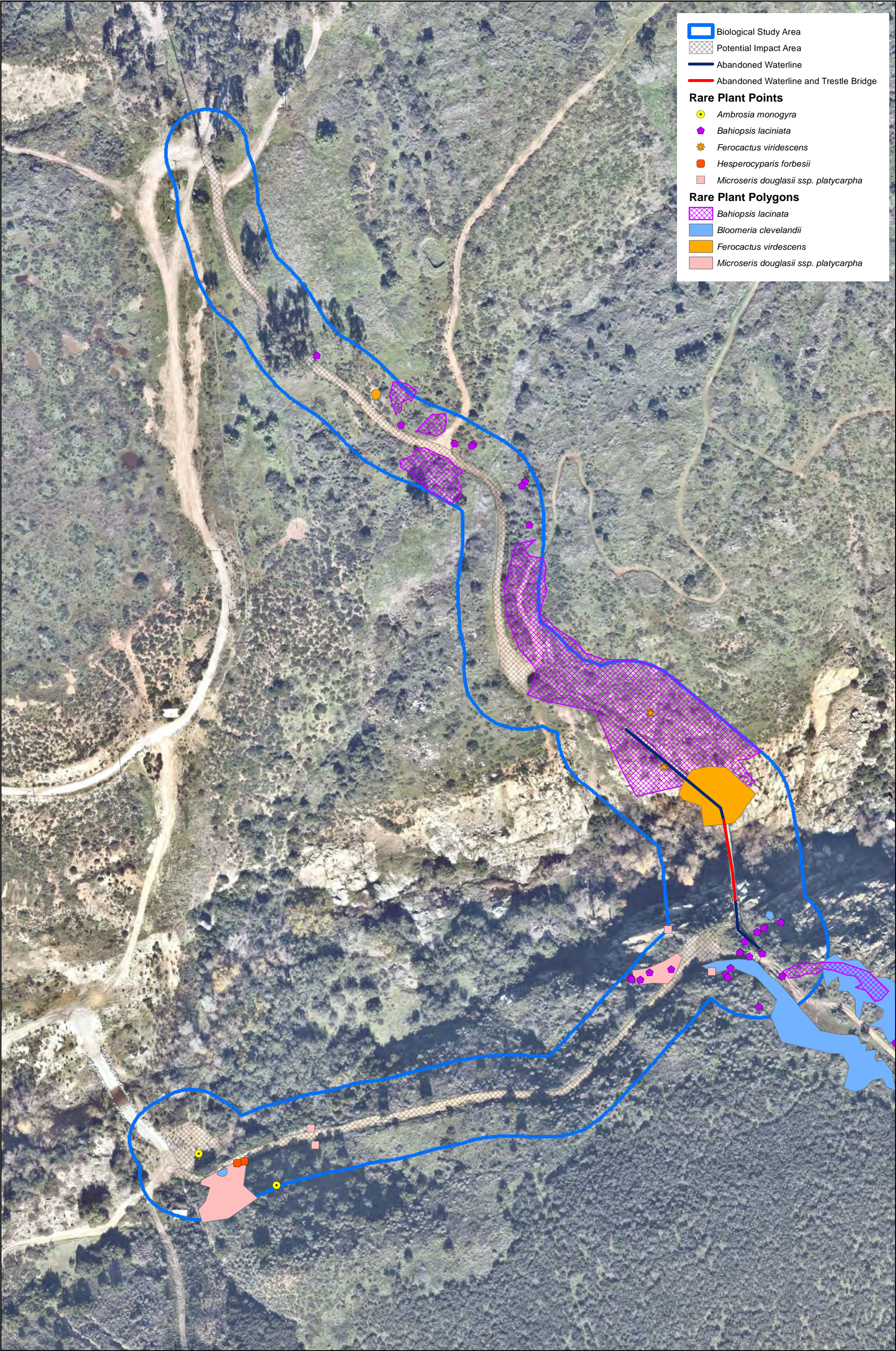
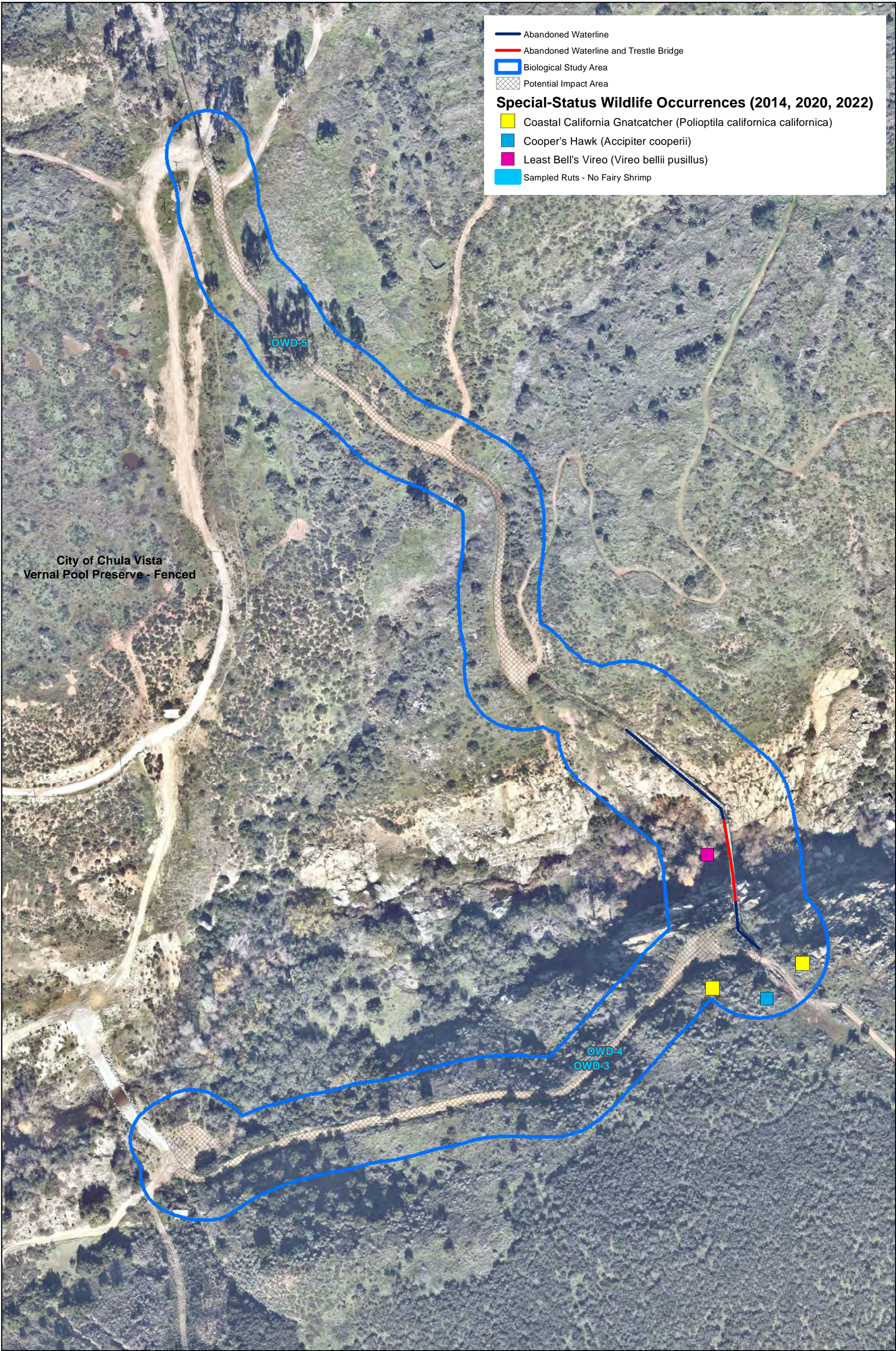


Figure 4: Special-Status Plants
Biological Resources Letter Report
Otay Trestle Bridge Demolition Project



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**Figure 5: Special-Status Wildlife
Biological Resources Letter Report
Otay Trestle Bridge Demolition Project**



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Figure 6: Quino Habitat Assessment Survey Results
Biological Resources Letter Report
Otay Trestle Bridge Demolition Project

Appendix B

Plant Species Observed

Attachment B. Plant Species Detected

Scientific Name	Common Name	Special Status
FERNS		
Pteridaceae - Brake family		
<i>Pentagramma triangularis</i>	Goldback fern	
GYMNOSPERMS		
Cupressaceae - Cypress family		
<i>Hesperocyparis forbesii</i>	Tecate cypress	CRPR 1B.1
EUDICOTS		
Anacardiaceae - Sumac Or Cashew family		
<i>Malosma laurina</i>	Laurel sumac	
<i>Rhus integrifolia</i>	Lemonade berry	
Asteraceae - Sunflower family		
<i>Ambrosia monogyra</i>	Singlewhorl burrobrush	CRPR 2B.2
<i>Ambrosia psilostachya</i>	Western ragweed	
<i>Artemisia californica</i>	California sagebrush	
<i>Baccharis salicina</i>	Emory's baccharis	
<i>Baccharis sarothroides</i>	Broom baccharis	
<i>Brickellia californica</i>	California brickellbush	
* <i>Carduus pycnocephalus ssp. pycnocephalus</i>	Italian thistle	
* <i>Centaurea melitensis</i>	Tocalote	
<i>Corethrogyne filaginifolia</i>	Common sand aster	
<i>Eriophyllum confertiflorum</i>	Golden woolly sunflower	
<i>Isocoma menziesii</i>	Coastal goldenbush	
<i>Microseris douglasii ssp. platycarpa</i>	Small-flowered microseris	CRPR 4.2
<i>Osmadenia tenella</i>	Osmadenia	
<i>Stephanomeria virgata</i>	Rod wire-lettuce	
<i>Viguiera laciniata</i>	San Diego County viguiera	CRPR 4.2
Boraginaceae - Borage family		
<i>Plagiobothrys sp.</i>	Popcornflower	
Brassicaceae - Mustard family		
* <i>Hirschfeldia incana</i>	Shortpod mustard	
<i>Lepidium nitidum</i>	Shining pepper-grass	
Cactaceae - Cactus family		
<i>Ferocactus viridescens</i>	San Diego barrel cactus	CRPR 2B.1
<i>Mammillaria dioica</i>	White fishhook cactus	

Scientific Name	Common Name	Special Status
Chenopodiaceae - Goosefoot family		
* <i>Atriplex semibaccata</i>	Australian saltbush	
* <i>Salsola tragus</i>	Prickly russian thistle	
Cistaceae - Rock-rose family		
<i>Crocanthemum scoparium var. vulgare</i>	Common peak rush-rose	
Crassulaceae - Stonecrop family		
<i>Crassula connata</i>	Pygmyweed	
<i>Dudleya edulis</i>	Ladies fingers	
<i>Dudleya pulverulenta</i>	Chalk dudleya	
Euphorbiaceae - Spurge family		
<i>Croton setiger</i>	Doveweed	
<i>Euphorbia polycarpa</i>	Many seed spurge	
Fabaceae - Legume family		
<i>Acemisson glaber</i>	Deerweed	
* <i>Medicago polymorpha</i>	California burclover	
Geraniaceae - Geranium family		
* <i>Erodium botrys</i>	Longbeak filaree	
* <i>Erodium cicutarium</i>	Redstem filaree	
Lamiaceae - Mint family		
<i>Salvia apiana</i>	White sage	
Malvaceae - Mallow family		
<i>Sidalcea sparsifolia</i>	Southern checkerbloom	
Myrtaceae - Myrtle family		
* <i>Eucalyptus polyanthemus</i>	Silver dollar gum	
Nyctaginaceae - Four O'clock family		
<i>Mirabilis laevis var. crassifolia</i>	Coastal wishbone plant	
Plantaginaceae - Plantain family		
<i>Plantago erecta</i>	Dot seed plantain	
Polygonaceae - Buckwheat family		
<i>Eriogonum fasciculatum var. foliolosum</i>	Leafy California buckwheat	
<i>Persicaria lapathifolia</i>	Willow smartweed	
Ranunculaceae - Buttercup family		
<i>Clematis pauciflora</i>	Few flowered virgin's bower	
Rhamnaceae - Buckthorn family		
<i>Rhamnus crocea</i>	Spiny redberry	

Scientific Name	Common Name	Special Status
Rosaceae - Rose family		
<i>Heteromeles arbutifolia</i>	Toyon	
Salicaceae - Willow family		
<i>Salix gooddingii</i>	Goodding's black willow	
<i>Salix lasiolepis</i>	Arroyo willow	
Simmondsiaceae - Jojoba family		
<i>Simmondsia chinensis</i>	Jojoba	
Tamaricaceae - Tamarisk family		
<i>Tamarix sp.</i>	Tamarix	
Violaceae - Violet family		
<i>Viola purpurea</i>	Purple violet	
MONOCOTS		
Agavaceae - Century Plant family		
<i>Hesperoyucca whipplei</i>	Chaparral yucca	
Arecaceae - Palm family		
* <i>Washingtonia robusta</i>	Mexican fan palm	
Liliaceae - Lily family		
<i>Calochortus weedii</i> var. <i>weedii</i>	Weed's mariposa lily	
Poaceae - Grass family		
<i>Aristida purpurea</i> var. <i>nealleyi</i>	Nealley three-awn	
* <i>Arundo donax</i>	Giant reed	
* <i>Avena barbata</i>	Slender wild oat	
* <i>Bromus hordeaceus</i>	Soft brome	
* <i>Bromus madritensis</i> ssp. <i>rubens</i>	Red brome	
* <i>Festuca myuros</i>	Rattail fescue	
<i>Melica imperfecta</i>	Coast range onion grass	
* <i>Melinis repens</i> ssp. <i>repens</i>	Natal grass	
<i>Muhlenbergia microsperma</i>	Littleseed muhly	
* <i>Pennisetum setaceum</i>	African fountain grass	
Themidaceae - Brodiaea family		
<i>Bloomeria clevelandii</i>	San Diego goldenstar	CRPR 1B.1
<i>Bloomeria crocea</i>	Common goldenstar	
Typhaceae - Cattail family		
<i>Typha sp.</i>	Cattail	

Scientific Name	Common Name	Special Status
Legend		
*= Non-native or invasive species		
Special Status:		
Federal:		
FE = Endangered		
FT = Threatened		
State:		
SE = Endangered		
ST =Threatened		
CRPR – California Rare Plant Rank		
1A. Presumed extinct in California and elsewhere		
1B. Rare or Endangered in California and elsewhere		
2A. Presumed extinct in California, more common elsewhere		
2B. Rare or Endangered in California, more common elsewhere		
3. Plants for which we need more information - Review list		
4. Plants of limited distribution - Watch list		
Threat Ranks		
.1 - Seriously endangered in California		
.2 – Fairly endangered in California		
.3 – Not very endangered in California		

Appendix C

Animal Species Observed

Appendix C. Wildlife Species Observed

Scientific Name	Common Name	Special Status
VERTEBRATES		
Reptiles		
<i>Sceloporus occidentalis</i>	Western Fence Lizard	
<i>Pituophis catenifer</i>	Gophersnake	
Birds		
<i>Elanus leucurus</i>	White-tailed Kite	CFP
<i>Circus hudsonius</i>	Northern Harrier	SSC
<i>Accipiter cooperii</i>	Cooper's Hawk	
<i>Calypte anna</i>	Anna's Hummingbird	
<i>Empidonax difficilis</i>	Pacific-slope Flycatcher	
<i>Myiarchus cinerascens</i>	Ash-throated Flycatcher	
<i>Vireo bellii pusillus</i>	Least Bell's Vireo	FE, SE
<i>Corvus brachyrhynchos</i>	American Crow	
<i>Catherpes mexicanus</i>	Canyon Wren	
<i>Thryomanes bewickii</i>	Bewick's Wren	
<i>Polioptila californica californica</i>	Coastal California Gnatcatcher	FT, SSC
<i>Chamaea fasciata</i>	Wrentit	
<i>Toxostoma redivivum</i>	California Thrasher	
<i>Mimus polyglottos</i>	Northern Mockingbird	
<i>Geothlypis trichas</i>	Common Yellowthroat	
<i>Cardellina pusilla</i>	Wilson's Warbler	
<i>Melospiza crissalis</i>	California Towhee	
<i>Melospiza melodia</i>	Song Sparrow	
<i>Sturnella neglecta</i>	Western Meadowlark	
<i>Haemorhous mexicanus</i>	House Finch	
<i>Carduelis psaltria</i>	Lesser Goldfinch	
Mammals		
<i>Canis latrans</i>	Coyote	
<i>Procyon lotor</i>	Northern Raccoon	

Scientific Name	Common Name	Special Status
Legend		
* = Non-native or invasive species		
Special Status:		
Federal:		
FE = Endangered		
FT = Threatened		
State:		
SE = Endangered		
ST = Threatened		
SSC = California Species of Special Concern		
CFP = California Fully Protected Species		

Appendix D

**Special Status Plant and Animal Species
Potential to Occur**

Appendix D. Sensitive Plant and Wildlife Species Potential for Occurrence Tables

Common Name (Scientific Name)	Sensitivity Code & Status	Habitat Preference/Requirements	Potential for occurrence	Rationale
Plants				
San Diego thorn-mint (<i>Acanthomintha ilicifolia</i>)	FT'/SE, 1B.1	Annual herb. Prefers friable or broken clay soils in grassy openings in chaparral and coastal sage scrub, valley and foothill grassland, and vernal pools; 10-960 m (33-3150 ft). Blooming period: April - June	Low	Suitable habitat present. Not observed during rare plant surveys
California adolphia (<i>Adolphia californica</i>)	2B.1	Deciduous shrub. Clay soils in chaparral, coastal scrub, and valley and foothill grassland; 45-740 m (147-2428 ft). Blooming period: December - May	Low	Suitable habitat present. Not observed during rare plant surveys
San Diego bur-sage (<i>Ambrosia chenopodiifolia</i>)	2B.1	Perennial shrub. Coastal scrub; 55-155 m (178-508 ft). Blooming period: April - June	Low	Suitable habitat present. Not observed during rare plant surveys
Singlewhorl burrobrush (<i>Ambrosia monogyra</i>)	2B.2	Perennial shrub. Sandy soils in chaparral, coastal sage scrub, Sonoran desert scrub, and washes; 10-500 m (328-1640 ft). Blooming period: August - November	Present	Suitable habitat present, species observed in the BSA.
San Diego ambrosia (<i>Ambrosia pumila</i>)	FE/ 1B.1	Rhizomatous herb. Sandy loam or clay soils in chaparral, coastal sage scrub, valley and foothill grassland, vernal pools; often in disturbed areas or sometimes alkaline areas. Can occur in creek beds, seasonally dry drainages, and floodplains; 20-415 m (66-1362 ft). Blooming period: April - October	Low	Suitable habitat present. Not observed during rare plant surveys
Otay manzanita (<i>Arctostaphylos otayensis</i>)	1B.2	Evergreen shrub. Chaparral or cismontane woodlands on volcanic rock outcrops; 275-1700 m (902-5576 ft). Blooming period: January - April	Low	Suitable habitat absent.
San Diego sagewort (<i>Artemisia palmeri</i>)	4.2	Deciduous shrub. Sandy soils in mesic areas in chaparral, coastal scrub, riparian forest, riparian scrub, riparian woodland; 15-915 m (49-3002 ft). Blooming period: February - September	Low	Suitable habitat present. Not observed during rare plant surveys

Appendix D. Sensitive Plant and Wildlife Species Potential for Occurrence Tables

Common Name (Scientific Name)	Sensitivity Code & Status	Habitat Preference/Requirements	Potential for occurrence	Rationale
Western spleenwort (<i>Asplenium vespertinum</i>)	4.2	Perennial rhizomatous herb. Rocky areas in chaparral, cismontane woodland, and coastal scrub; 180-1000 m (590-3281 ft). Blooming period: February - June	Low	Suitable habitat present. Not observed during rare plant surveys
Dean's milk-vetch (<i>Astragalus deanei</i>)	1B.1	Perennial herb. Open shrubby slopes, coastal sage scrub, chaparral, cismontane woodland, riparian forest, and sandy washes; 75-695 m (246-2279 ft). Blooming period: February - May	Low	Suitable habitat present. Not observed during rare plant surveys
Coulter's saltbush (<i>Atriplex coulteri</i>)	1B.2	Perennial herb. Alkaline or clay soils in coastal bluff scrub, coastal dunes, coastal scrub, and valley and foothill grassland; 3-460 m (9-1509 ft). Blooming period: March - October	Low	Suitable habitat present. Not observed during rare plant surveys
South coast saltscale (<i>Atriplex pacifica</i>)	1B.2	Annual herb. Coastal bluff scrub, coastal dunes, coastal scrub, playas; 0-140 m (0-459 ft). Blooming period: March - October	Low	Suitable habitat present. Not observed during rare plant surveys
Golden-spined cereus (<i>Bergerocactus emoryi</i>)	2B.2	Perennial stem succulent. Sandy soils in coastal scrub, chaparral, and closed-cone coniferous forest, moist ocean breezes may be a key to its habitat requirements; 3-395 m (9-1295 ft). Blooming period: May - June	Low	Suitable habitat present. Not observed during rare plant surveys
San Diego goldenstar (<i>Bloomeria clevelandii</i>)	1B.1	Perennial bulbiferous herb. Clay soils in chaparral, coastal sage scrub, valley grasslands, particularly near mima mound topography or the vicinity of vernal pools; 50 - 465 m (164-1526 ft). Blooming period: April - May	Present	Observed in suitable habitat on the south side of the Otay River in the BSA.
Orcutt's brodiaea (<i>Brodiaea orcuttii</i>)	1B.1	Bulbiferous herb. Found on mesic, clay, sometimes serpentinite soils in closed-cone coniferous forest, chaparral, cismontane woodland, meadows and seeps, valley and foothill grassland, and vernal pools; 30-1692 m (98-5550 ft). Blooming period: May - July	Low	Suitable habitat present. Not observed during rare plant surveys

Appendix D. Sensitive Plant and Wildlife Species Potential for Occurrence Tables

Common Name (Scientific Name)	Sensitivity Code & Status	Habitat Preference/Requirements	Potential for occurrence	Rationale
Brewer's calandrinia (<i>Calandrinia breweri</i>)	4.2	Annual herb. Sandy or loamy soils, disturbed and/or burned sites in chaparral and coastal scrub; 10-1220 m (32-4001 ft). Blooming period: March - June	Low	Suitable habitat present. Not observed during rare plant surveys
Dunn's mariposa-lily (<i>Calochortus dunnii</i>)	SR, 1B.2	Perennial bulbiferous herb. Gabbroic or metavolcanic soils, or rocky openings in chaparral or grassland/chaparral ecotone, also in closed-cone coniferous forest; 185-1830 m (606-6002 ft). Blooming period: February - June	Not Expected	Suitable habitat absent. Generally restricted to higher elevation volcanic mountains.
Lewis' evening-primrose (<i>Camissoniopsis lewisii</i>)	3	Annual herb. Sandy or clay soils in coastal bluff scrub, cismontane woodland, coastal dunes, coastal scrub, and valley and foothill grassland; 0-300 m (0-984 ft). Blooming period: March - June	Not Expected	Generally restricted to sandy coastal areas.
Lakeside ceanothus (<i>Ceanothus cyaneus</i>)	1B.2	Evergreen shrub. Closed-cone coniferous forest, dense chaparral; 235-755 m (771-2543 ft). Blooming period: April - June	Not Expected	Suitable habitat absent. Outside of the restricted range of this species.
Otay Mountain ceanothus (<i>Ceanothus otayensis</i>)	1B.2	Perennial evergreen shrub. Metavolcanic or gabbroic chaparral; 600-1100 m (1968-3608 ft). Blooming period: January - April	Low	Generally restricted to metavolcanic soils not present in the BSA. Not observed during rare plant surveys
Southern mountain misery (<i>Chamaebatia australis</i>)	4.2	Evergreen shrub. Gabbroic or metavolcanic chaparral; 300-1020 m (984-3345 ft). Blooming period: November - May	Low	Generally restricted to metavolcanic soils not present in the BSA. Not observed during rare plant surveys
Long-spined spineflower (<i>Chroisanthe polygonoides</i> var. <i>longispina</i>)	1B.2	Annual herb. Clay lenses, largely devoid of shrubs in chaparral, coastal scrub, meadows and seeps, valley and foothill grassland, and vernal pools; 30-1530 m (98-5018 ft). Blooming period: April - July	Not Expected	Required soils absent.
Seaside cistanthe (<i>Cistanthe maritima</i>)	4.2	Annual herb. Sandy soils in coastal bluff scrub, coastal scrub, and valley and foothill grassland; 5-300 m (16-984 ft). Blooming period: February - August	Not Expected	Coastal species

Appendix D. Sensitive Plant and Wildlife Species Potential for Occurrence Tables

Common Name (Scientific Name)	Sensitivity Code & Status	Habitat Preference/Requirements	Potential for occurrence	Rationale
Delicate clarkia (<i>Clarkia delicata</i>)	1B.2	Annual herb. Oak woodlands and chaparral, often on gabbroic soils; 235-1000 m (770-3280 ft). Blooming period: April - June	Not Expected	Suitable habitat absent.
San Miguel savory (<i>Clinopodium chandleri</i>)	1B.2	Perennial shrub. Rocky , gabbroic, or metavolcanic areas in chaparral, cismontane woodland, coastal scrub, riparian scrub, and valley and foothill grassland; 120-1075 m (393-3526 ft). Blooming period: March - July	Low	Generally restricted to metavolcanic soils not present in the BSA. Not observed during rare plant surveys
Summer holly (<i>Comarostaphylis diversifolia</i> ssp. <i>diversifolia</i>)	1B.2	Evergreen shrub. Chaparral and cismontane woodland; 30-790 m (98-2591 ft). Blooming period: April - June	Low	Suitable habitat present. Not observed during rare plant surveys
Small-flowered morning glory (<i>Convolvulus simulans</i>)	4.2	Annual herb. Friable clay soils or serpentine seeps in chaparral openings, coastal scrub, and valley and foothill grassland; 30-700 m (98-2297 ft). Blooming period: March - July	Low	Suitable habitat present. Not observed during rare plant surveys
San Diego sand aster (<i>Corethrogyne filaginifolia</i> var. <i>incana</i>)	1B.1	Perennial herb. Coastal bluff scrub, chaparral, and coastal scrub; 3-115 m (9-377 ft). Blooming period: June - September	Low	Suitable habitat present. Not observed during rare plant surveys
Snake cholla (<i>Cylindropuntia californica</i> var. <i>californica</i>)	1B.1	Stem succulent. Chaparral and coastal scrub, typically on xeric hillsides; 30-150 m (98-492 ft). Blooming period: April - May	Low	Suitable habitat present. Not observed during rare plant surveys
Otay tarplant (<i>Deinandra conjugens</i>)	FT/SE, 1B.1	Annual herb. Clay soils in coastal sage scrub and valley and foothill grassland; 25-300 m (82-984 ft). Blooming period: May - June	Low	Suitable habitat present. Not observed during rare plant surveys
Western dichondra (<i>Dichondra occidentalis</i>)	4.2	Perennial rhizomatous herb. Chaparral, cismontane woodland, coastal scrub, and valley and foothill grassland; 50-500 m (164-1640 ft). Blooming period: January - July	Low	Suitable habitat present. Not observed during rare plant surveys

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Common Name (Scientific Name)	Sensitivity Code & Status	Habitat Preference/Requirements	Potential for occurrence	Rationale
Orcutt's bird's-beak (<i>Dicranostegia orcuttiana</i>)	2B.1	Hemiparasitic annual herb. Coastal scrub, seasonally dry drainages, uplands adjacent to riparian habitat; 10-350 m (32-1148 ft). Blooming period: March - September	Not Expected	Generally restricted to metavolcanic soils not present in the BSA. Not observed during rare plant surveys
Variegated dudleya (<i>Dudleya variegata</i>)	1B.2	Perennial herb. Clay soils in chaparral, cismontane woodland, coastal scrub, valley and foothill grassland, and vernal pools; 3-580 m (9-1903 ft). Blooming period: April - June	Low	Suitable habitat present. Not observed during rare plant surveys
Palmer's goldenbush (<i>Ericamerica palmeri</i> var. <i>palmeri</i>)	1B.1	Evergreen shrub. Coastal drainages, in mesic chaparral or in coastal sage scrub; below 600 m (1969 ft). Blooming period: August - October (uncommon in July)	Low	Marginal habitat present. Not observed during rare plant surveys
San Diego button-celery (<i>Eryngium aristulatum</i> var. <i>parishii</i>)	FE/SE, 1B.1	Annual/perennial herb. Mesic soils in coastal scrub, valley and foothill grassland, and vernal pools; 20-620 m (65-2034 ft). Blooming period: April - June	Low	Suitable soils present but no vernal pools present in BSA. Not observed during rare plant surveys
Cliff spurge (<i>Euphorbia misera</i>)	2B.2	Perennial shrub. Rocky areas in coastal bluff scrub, coastal scrub, and Mojavean desert scrub; 10-500 m (32-1640 ft). Blooming period: December - October	Low	Suitable habitat present. Not observed during rare plant surveys
San Diego barrel cactus (<i>Ferocactus viridescens</i>)	2B.1	Stem succulent. Sandy to rocky areas; chaparral, coastal scrub, valley and foothill grassland, vernal pools; 3-450 m (9-1476 ft). Blooming period: May - June	Present	34 individuals detected within coastal sage scrub in the BSA.
Mexican flannelbush (<i>Fremontodendron mexicanum</i>)	FE/SR, 1B.1	Evergreen shrub. Gabbroic, metavolcanic, or serpentine soils in closed-cone coniferous forest, chaparral, and cismontane woodland; 10-716 m (32-2349 ft). Blooming period: March - June	Not Expected	Suitable habitat absent.
Desert bedstraw (<i>Galium proliferum</i>)	2B.2	Annual herb. Rocky or limestone carbonate areas in Joshua tree woodland, Mojavean desert scrub, and Pinyon and Juniper woodland; 1190-1630 m (3903-5346 ft). Blooming period: March - June	Low	Suitable habitat present. Not observed during rare plant surveys

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Common Name (Scientific Name)	Sensitivity Code & Status	Habitat Preference/Requirements	Potential for occurrence	Rationale
Palmer's grapplinghook (<i>Harpagonella palmeri</i>)	4.2	Annual herb. Clay soils in chaparral, grasslands, coastal sage scrub; 20-955 m (65 to 3132 ft). Blooming period: March - May	Low	Suitable habitat present. Not observed during rare plant surveys
Tecate cypress (<i>Hesperocyparis forbesii</i>)	1B.1	Perennial evergreen tree. Clay, gabbroic, or metavolcanic soils within closed-cone coniferous forest and chaparral; 80-1500 m (262-4921 ft).	Present	2 individuals detected within the BSA.
Graceful Tarplant (<i>Holocarpha virgata</i> ssp. <i>elongata</i>)	4.2	Annual herb. Chaparral, cismontane woodland, coastal scrub, and valley and foothill grassland; 60-1100 m (196-3600 ft). Blooming period: May - November	Low	Suitable habitat present. Not observed during rare plant surveys
Otay Mountain lotus (<i>Hosackia crassifolia</i> var. <i>otayensis</i>)	1B.1	Perennial herb. Metavolcanic chaparral, often in disturbed areas; 380-1005 m (1246-3296 ft). Blooming period: May - August	Not Expected	Generally restricted to metavolcanic soils not present in the BSA. Not observed during rare plant surveys
Decumbent goldenbush (<i>Isocoma menziesii</i> var. <i>decumbens</i>)	1B.2	Perennial shrub. Chaparral and in sandy coastal scrub, often in sandy disturbed areas; 10-135 m (33-443 ft). Blooming period: April - November	Low	Suitable habitat present. Not observed during rare plant surveys. Common species observed in BSA; this conspicuous variety was not observed.
San Diego marsh-elder (<i>Iva hayesiana</i>)	2B.2	Perennial herb. Marshes and swamps, wetland areas, and playas; 10-500 m (32-1640 ft). Blooming period: April - October	Low	Suitable habitat present. Not observed during rare plant surveys
Southwestern spiny rush (<i>Juncus acutus</i> ssp. <i>leopoldii</i>)	4.2	Perennial rhizomatous herb. Mesic soils in coastal dunes, alkaline seeps in meadows and seeps, and coastal salt marshes and swamps; 3-900 m (9-2953 ft). Blooming period: May - June	Low	Suitable habitat present. Not observed during rare plant surveys
Coulter's goldfields (<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>)	1B.1	Annual herb. Coastal salt marsh, coastal salt swamps, playas, vernal pools; 1-1220 m (3-4001 ft). Blooming period: February - June	Not Expected	Coastal species not expected in BSA.
Gander's pitcher sage (<i>Lepechinia ganderi</i>)	1B.3	Perennial shrub. Gabbroic or metavolcanic soils in closed-cone coniferous forest, chaparral, coastal scrub, and valley and foothill grassland; 305-1005 m (1000-3296 ft). Blooming period: June - July	Not Expected	Generally restricted to metavolcanic soils not present in the BSA. Not observed during rare plant surveys

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Robinson's pepper-grass (<i>Lepidium virginicum</i> var. <i>robinsonii</i>)	4.3	Annual herb. Openings in chaparral and sage scrub; below 885 m (2900 ft). Blooming Period: January - July	Low	Suitable habitat present. Not observed during rare plant surveys
Ocellated Humboldt lily (<i>Lilium humboldtii</i> ssp. <i>ocellatum</i>)	4.2	Perennial bulbiferous herb. Openings in chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, and riparian woodland; 30-1800 m (98- 5904 ft). Blooming period: March - August	Low	Suitable habitat present. Not observed during rare plant surveys
California box-thorn (<i>Lycium californicum</i>)	4.2	Perennial shrub. Coastal bluff scrub and coastal scrub; 5-150 m (16-492 ft). Blooming period: December - August	Low	Suitable habitat present. Not observed during rare plant surveys
Small-flowered microseris (<i>Microseris douglasii</i> ssp. <i>platycarpha</i>)	4.2	annual herb. Coastal scrub, grassland, and vernal pool periphery. 15-1070 m (50- 3510 ft) Blooming Period. March - May	Present	Observed within the BSA
Felt-leaved monardella (<i>Monardella hypoleuca</i> ssp. <i>lanata</i>)	1B.2	Rhizomatous herb. Chaparral and cismontane woodland; 300-1575 m (984- 5040 ft). Blooming Period: June - August	Not Expected	Generally restricted to metavolcanic soils not present in the BSA. Not observed during rare plant surveys
Jennifer's monardella (<i>Monardella stoneana</i>)	1B.2	Perennial herb. Usually in rocky, intermittent streambeds in closed-cone coniferous forest, chaparral, coastal scrub, riparian scrub; 10-790 m (32-2591 ft). Blooming period: June - September	Low	Potentially suitable habitat present. Generally restricted to Otay Mountain. Not observed during rare plant surveys
Little mousetail (<i>Myosurus minimus</i> ssp. <i>apus</i>)	3.1	Annual herb. Valley and foothill grassland, and alkaline vernal pools; 20-640 m (65- 2100 ft). Blooming period: March - June	Not Expected	Suitable soils present but no vernal pools present in BSA. Not observed during rare plant surveys
Mud nama (<i>Nama stenocarpum</i>)	2B.2	Annual/perennial herb. Marshes and swamps, also riverbanks and lake margins; 5-500 m (16-1640 ft). Blooming period: January - July	Low	Suitable habitat present. Not observed during rare plant surveys
Spreading navarretia (<i>Navarretia fossalis</i>)	FT/ 1B.1	Annual herb. Chenopod scrub, assorted freshwater marshes and swamps, playas, and vernal pools; 30-655 m (98-2149 ft). Blooming period: April - June	Not Expected	Suitable soils present but no vernal pools present in BSA. Not observed during rare plant surveys
California adder's-tongue (<i>Ophioglossum californicum</i>)	4.2	Perennial rhizomatous herb. Mesic areas in chaparral, valley and foothill grasslands, and the margins of vernal pools; 60-525. Blooming period: December - June	Low	Suitable habitat present. Not observed during rare plant surveys

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California Orcutt grass (<i>Orcuttia californica</i>)	FE/CE, 1B.1	Annual herb. Vernal pools; 15-660 m (49-2165 ft). Blooming period: April - August	Not Expected	Suitable soils present but no vernal pools present in BSA. Not observed during rare plant surveys
Golden-Rayed pentachaeta (<i>Pentachaeta aurea ssp. aurea</i>)	4.2	Annual herb. Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, riparian woodland, and valley and foothill grassland; 80-1850 m (262-6068 ft). Blooming period: March - July.	Low	Suitable habitat present. Not observed during rare plant surveys
Woolly chaparral pea (<i>Pickeringia montana var. tomentosa</i>)	4.3	Evergreen shrub. Gabbroic, granitic, or clay soils in chaparral; 0-1700 m (0-5577 ft). Blooming period: May - August	Not Expected	Generally restricted to metavolcanic soils not present in the BSA. Not observed during rare plant surveys
Chaparral rein orchid (<i>Piperia cooperi</i>)	4.2	Perennial herb. Chaparral, cismontane woodland, and valley and foothill grassland; 15-1585 m (49-5200 ft). Blooming period: March - June	Low	Suitable habitat present. Not observed during rare plant surveys
Otay Mesa mint (<i>Pogogyne nudiuscula</i>)	FE/CE, 1B.1	Annual herb. Vernal pools; 90-250 (295-820 ft). Blooming period: May - July	Not Expected	Suitable soils present but no vernal pools present in BSA. Not observed during rare plant surveys
Nuttall's scrub oak (<i>Quercus dumosa</i>)	1B.1	Perennial evergreen shrub. Sandy or clay loam in closed-cone coniferous forest, chaparral, and coastal scrub; 15-400 m (49-1312 ft.). Blooming period: February - August	Low	Suitable habitat present. Not observed during rare plant surveys
Engelmann oak (<i>Quercus engelmannii</i>)	4.2	Deciduous tree. Cismontane woodland, chaparral, riparian woodland, and valley and foothill grassland; 50-1300 m (164-4265 ft). Blooming period: March - June	Low	Suitable habitat present. Not observed during rare plant surveys
Coulter's matilija poppy (<i>Romneya coulteri</i>)	4.2	Perennial rhizomatous herb. Chaparral and coastal scrub; often in burned areas; 20-1200 m (65-3936 ft). Blooming period: March - July	Low	Suitable habitat present. Not observed during rare plant surveys
Small-leaved rose (<i>Rosa minutifolia</i>)	CE, 2B.1	Deciduous shrub. Chaparral and coastal scrub; 150-160 m (492-524 ft). Blooming period: January - June	Low	Suitable habitat present. Not observed during rare plant surveys
Munz's sage (<i>Salvia munzii</i>)	2B.2	Evergreen shrub. Chaparral and coastal sage scrub; 120-1065 m (393-3493 ft). Blooming period: February - April	Low	Suitable habitat present. Not observed during rare plant surveys

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Common Name (Scientific Name)	Sensitivity Code & Status	Habitat Preference/Requirements	Potential for occurrence	Rationale
Chaparral ragwort (<i>Senecio aphanactis</i>)	2B.2	Annual herb. Chaparral, cismontane woodland, coastal scrub, and alkaline flats; 15-800 m (49-2624 ft.). Blooming period: January - April	Low	Suitable habitat present. Not observed during rare plant surveys
Purple stemodia (<i>Stemodia durantifolia</i>)	2B.1	Perennial herb. Population wide, along minor creeks and seasonal drainages, often in mesic, sandy soils in Sonoran desert scrub. Within the coastal zone in streams and creeks, typically slow moving rocky streams; 180-300 m (590-984 ft). Blooming period: January - December	Low	Suitable habitat present. Not observed during rare plant surveys
San Diego County needle grass (<i>Stipa diegoensis</i>)	4.2	Perennial herb. Rocky, often mesic soils within chaparral and coastal scrub; 10-800 m (32-2624 ft). Blooming period: February - June	Present	Observed within the BSA
Laguna Mountains jewel-flower (<i>Streptanthus bernardinus</i>)	4.3	Perennial herb. Chaparral and lower montane coniferous forest; 670-2500 m (2198-8202 ft). Blooming period: May - August	Not expected	Primarily a montane species
Parry's tetracoccus (<i>Tetracoccus dioicus</i>)	1B.2	Deciduous shrub. Chaparral and coastal sage scrub; 165-1000 m (541-3280 ft). Blooming period: April - May	Low	Suitable habitat present. Not observed during rare plant surveys
San Diego County viguiera (<i>Viguiera laciniata</i>)	4.2	Perennial shrub. Chaparral and coastal scrub; 10-750 m (33-2461 ft). Blooming period: February - August	Present	Species detected in Diegan coastal sage scrub in the BSA.
Invertebrates				
San Diego fairy shrimp (<i>Branchinecta sandiegonensis</i>)	FE	Vernal pools. All known localities are below 701 m (2,300 ft) and are within 64 km (40 miles) of the Pacific Ocean.	Absent	Dry season surveys confirmed absence in 3 road ruts in BSA
Riverside fairy shrimp (<i>Streptocephalus woottoni</i>)	FE	Vernal pools and cattle ponds. In San Diego County, all populations are within 15 kilometers of the coast.	Absent	Ruts in BSA were not potentially suitable habitat. No cysts found in dry season surveys in 2022.
Monarch - California overwintering population (<i>Danaus plexippus</i> pop. 1)	FC	Overwinters in eucalyptus or other tall trees within ~1 mile of the Pacific Ocean from Santa Barbara south to Baja California Norte	Not Expected	Site is over 5 miles from the coast and is therefore unsuitable as overwintering habitat for monarch.

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Quino checkerspot butterfly (<i>Euphydryas editha quino</i>)	FE	Inhabits openings on clay soils within or in the vicinity of shrublands, grasslands, meadows, vernal pools, and lake margins. Closely tied to its larval host plant, dwarf plantain (<i>Plantago erecta</i>) or owl's clover (<i>Orthocarpus purpureus</i>).	Assumed Present	Suitable host plants present. Several known populations of Quino found within 1 km of the BSA.
Hermes copper (<i>Lycaena hermes</i>)	FT	Mature spiny redberry host plant (<i>Rhamnus crocea</i>) surrounded by California buckwheat nectaring resources.	Not Expected	No suitable spiny redberry habitat present in the BSA.
Reptiles and Amphibians				
Arroyo toad (<i>Anaxyrus californicus</i>)	FE/SSC	Exposed shallow pools with a sand or gravel base are used for breeding. Breeding pools must occur in the vicinity (ca. 10-100 m) of a braided sandy channel with shorelines or central bars made of stable, sandy terraces.	Not Expected	No suitable breeding habitat present in the BSA. Not known to breed in the Otay River (CFO 2022).
Western spadefoot (<i>Spea hammondi</i>)	SSC	Temporary rainpools with water temperatures between 9°C and <30°C that last at least 3 weeks.	Low	No vernal pool breeding habitat present in the BSA.
Blainville's horned lizard (<i>Phrynosoma blainvillii</i>)	SSC	Grasslands, brushlands, woodlands, and open coniferous forest with sandy or loose soil; requires abundant ant colonies for foraging	High	Suitable habitat present. Known from the vicinity of the BSA (CDFW 2020).
Coastal tiger whiptail (<i>Aspidoscelis tigris stejnegeri</i>)	SSC	Found in a wide variety of habitats in cismontane southern California including coastal sage scrub, chaparral, riparian, woodlands, and rocky areas.	High	Suitable habitat present. Known from the vicinity of the BSA (CDFW 2020).
Red diamond rattlesnake (<i>Crotalus ruber ruber</i>)	SSC	Occurs from sea level to 914 m (3,000 ft) in chaparral, woodland, and arid desert habitats with rocky areas and dense vegetation.	High	Suitable habitat present. Known from the vicinity of the BSA (CDFW 2020).
Two-striped gartersnake (<i>Thamnophis hammondi</i>)	SSC	Inhabits perennial and intermittent streams with rocky beds and bordered by willow thickets or other dense vegetation	High	Suitable habitat present in the Otay River below the BSA.

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Common Name (Scientific Name)	Sensitivity Code & Status	Habitat Preference/Requirements	Potential for occurrence	Rationale
Birds				
Golden eagle (<i>Aquila chrysaetos</i>)	BAGEA/CFP	Nest on cliff ledges or trees on steep slopes. Forage in grasslands, sage scrub or broken chaparral.	Moderate	No potential to nest in the BSA. Known to forage on Otay Mountain (Tracey et al. 2017). Moderate potential to utilize the BSA for foraging.
Bald eagle (<i>Haliaeetus leucocephalus</i>)	BAGEA/CE, CFP	Nests in trees near rivers and reservoirs. Feeds on fish and carrion	Not Expected	No potential to nest in the BSA. No suitable foraging habitat.
Northern harrier (<i>Circus hudsonius</i>)	SSC	Grasslands and marshes. Nests are on the ground and typically concealed within a marsh or other dense vegetation.	Present	Suitable nesting habitat present in the BSA. Has been observed in the BSA.
White-tailed kite (<i>Elanus leucurus</i>)	SSC, CFP	Open grasslands, agricultural areas, wetlands, and oak woodlands. Their primary source of food is the California vole. It typically forages in open undisturbed habitats and nests in the top of a dense oak, willow or other large tree.	Present	Suitable nesting habitat present in the BSA. Has been observed in the BSA.
Western burrowing owl (<i>Athene cunicularia hypugaea</i>)	SSC	Resident and migratory. Prairies, grasslands, lowland scrub, agricultural lands, coastal dunes, desert floors, and some artificial, open areas. They require large open expanses of sparsely vegetated areas on gently rolling or level terrain with an abundance of active small mammal burrows. They use rodent or other burrows for roosting and nesting cover and also known to use pipes, culverts, and nest boxes where burrows are scarce. Limited and declining nesting locations in San Diego County.	Low	No suitable habitat present in the BSA
Southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	FE/SE	Neotropical migrant. Breeds in denes, multi-layered riparian woodlands along rivers, streams, or other wetlands. They usually nest within close proximity of water or very saturated soil.	Not Expected	Riparian habitat in the BSA is not suitable habitat for this species; lacks structural diversity necessary for this species.

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Vermilion flycatcher (<i>Pyrocephalus rubinus</i>)	SSC	Neotropical migrant. Breeds and forages in open woodlands and park-like setting including oak woodlands, open riparian woodland, golf courses, and cemeteries.	Not Expected	Suitable habitat absent.
Loggerhead shrike (<i>Lanius ludovicianus</i>)	SSC	Found near grassland, open sage scrub and chaparral, and desert scrub. They nest in dense vegetation adjacent to their open foraging habitats.	Moderate	Suitable habitat present. Not observed in the BSA.
Least Bell's vireo (<i>Vireo bellii pusillus</i>)	FE/SE	Neotropical migrant. Riparian thickets either near water or in dry portions of river bottoms; nests along margins of bushes and forages low to the ground	Present	Suitable breeding habitat present under the trestle in the BSA. Observed in 2014. Riparian habitat in the Otay River is assumed to be occupied.
San Diego cactus wren (<i>Campylorhynchus brunneicapillus sandiegensis</i>)	SSC	Thickets of large and/or dense mature cactus, primarily prickly pear (<i>Opuntia</i> spp.) and cholla (<i>Cylindropuntia</i> spp.). Sensitive subspecies occurs in San Diego and Orange Counties.	Not Expected	Suitable breeding habitat absent. No large cactus present in the BSA.
Clark's marsh wren (<i>Cistothorus palustris clarkae</i>)	SSC	Coastal southern California subspecies breeds in freshwater and brackish marshes mainly along and near the coast. Spreads more widely during non-breeding into salt marshes and wet grassy areas.	Not Expected	Suitable habitat absent. No suitable marsh habitat present in the BSA.
Coastal California gnatcatcher (<i>Polioptila californica californica</i>)	FT, SSC	Prefer open scrubby habitats such as coastal sage scrub and some forms of chaparral.	Present	Suitable habitat present. Species observed in the BSA.
Grasshopper sparrow (<i>Ammodramus savannarum</i>)	SSC	Localized and uncommon in structurally diverse grassland usually with native grasses.	Moderate	Known from Otay Mesa. The small grasslands present in the BSA are marginal habitat for this species.
Western yellow-billed cuckoo (<i>Coccyzus americanus occidentalis</i>)	CE	Generally found in extensive stands of riparian woodland.	Not Expected	Riparian habitat in the BSA is not suitable habitat for this species; lacks structural diversity necessary for this species.

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Tricolored blackbird (<i>Agelaius tricolor</i>)	CT, SSC	Breeds near fresh water, preferably in emergent wetland with large, dense stands of cattails or tules, but also in thickets of willow, blackberry, wild rose, tall herbs. Feeds in grassland and cropland habitats.	Low	No suitable nesting habitat present in the Otay River in or around the BSA. Limited foraging habitat present in the BSA.
Yellow-breasted chat (<i>Ictera virens</i>)	SSC	Dense riparian woodland.	High	Suitable breeding habitat present under the trestle in the BSA.
Yellow warbler (<i>Setophaga petechia</i>)	SSC	Riparian scrub and woodlands.	High	Suitable breeding habitat present under the trestle in the BSA. Common in suitable habitat in SW San Diego County rivers.
Mammals				
Pallid bat (<i>Antrozous pallidus</i>)	SSC	Throughout So. Cal. from coast to mixed conifer forest; grasslands, shrublands, woodlands, & forest; most common in open, dry habitats w/ rocky areas for roosting; yearlong resident in most of range. Roosts in rock crevices, caves, mine shafts, under bridges, in buildings and tree hollows.	Roosting – Moderate Foraging – Low	Marginally suitable roosting and foraging habitat is present on site. Not detected during focused surveys. No bat colonies in or directly adjacent to the structure.
Mexican long-tongued bat (<i>Choeronycteris mexicana</i>)	SSC	Likes desert canyons, arid mountain ranges. Roosts by day in caves, mines, or buildings.	Roosting – Low Foraging – Low	Not detected during focused surveys. No bat colonies in or directly adjacent to the structure.
Townsend's big-eared bat (<i>Corynorhinus townsendii</i>)	SSC	Throughout Cal. in all but sub-alpine & alpine habitats yearlong; most abundant in mesic habitats; Roosts – caves, mines, tunnels, buildings, or other man-made structures.	Roosting – Moderate Foraging – Moderate	Suitable roosting and foraging habitat occurs in the survey area. Not detected during focused surveys. No bat colonies in or directly adjacent to the structure.
Western mastiff bat (<i>Eumops perotis californicus</i>)	SSC	Primarily a cliff-dwelling species for breeding. Found foraging in a variety of habitats, from dry desert washes, flood plains, chaparral, oak woodland, open ponderosa pine forest, grassland, montane meadows, and agricultural areas.	Roosting – Low Foraging – Moderate	Suitable habitat present. Not detected during focused surveys. No bat colonies in or directly adjacent to the structure.

Appendix D. Sensitive Plant and Wildlife Species Potential for Occurrence Tables

Common Name (Scientific Name)	Sensitivity Code & Status	Habitat Preference/Requirements	Potential for occurrence	Rationale
Western red bat (<i>Lasiurus blossevillii</i>)	SSC	Usually among dense foliage, in forests and wooded areas, making long migrations from the northern latitudes to warmer climes for winter, sometimes hibernates in tree hollows or woodpecker holes.	Roosting – Low Foraging – Low	Marginal habitat present. Not detected during focused surveys. No bat colonies in or directly adjacent to the structure.
Pocketed free-tailed bat (<i>Nyctinomops femorosaccus</i>)	SSC	Lives in deserts and sage scrub, roosts in rocky crevices.	Roosting – Moderate Foraging – Moderate	Suitable habitat present. Not detected during focused surveys. No bat colonies in or directly adjacent to the structure.
Bryant's (San Diego desert) woodrat (<i>Neotoma bryanti</i>)	SSC	Variety of shrub and desert habitats primarily associated with rock outcroppings, boulders, cacti, or areas of dense undergrowth.	Moderate	No nests observed during surveys. Locally common in suitable rocky habitat present in the BSA.
San Diego black-tailed jackrabbit (<i>Lepus californicus bennettii</i>)	SSC	Mostly found on the coastal side of our local mountains in open habitats, usually avoiding dense stands of chaparral or woodlands.	Moderate	Suitable habitat present near the BSA. Limited suitable habitat

Appendix D. Sensitive Plant and Wildlife Species Potential for Occurrence Tables

Common Name (Scientific Name)	Sensitivity Code & Status	Habitat Preference/Requirements	Potential for occurrence	Rationale
<p>Status:</p> <p>Federal</p> <p>FE = listed as endangered under the federal Endangered Species Act.</p> <p>FT = listed as threatened under the federal Endangered Species Act.</p> <p>FC = listed as candidate for listing under the Federal Endangered Species Act.</p> <p>State</p> <p>CE = listed as endangered under the California Endangered Species Act.</p> <p>CT = listed as threatened under California Endangered Species Act.</p> <p>SSC = listed as a California Species of Special Concern.</p> <p>CFP= listed as a California Fully Protected Species</p> <p>SR= listed as Rare under the California Native Plant Protection Act</p> <p>CRPR—California Rare Plant Rank</p> <p>1A = Presumed extinct in California and elsewhere</p> <p>1B = Rare or Endangered in California and elsewhere</p> <p>2A = Presumed extinct in California, more common elsewhere</p> <p>2B = Rare or Endangered in California, more common elsewhere</p> <p>3 = Plants for which we need more information - Review list</p> <p>4 = Plants of limited distribution - Watch list</p> <p>Threat Ranks</p> <p>.1 - Seriously endangered in California</p> <p>.2 – Fairly endangered in California</p> <p>.3 – Not very endangered in California</p> <p>References:</p> <p>Special Status plant listing information from CDFW 2022b. Nomenclature and plant descriptions from: CNPS Online Inventory (CNPS 2022), Calflora.org, Baldwin 2012, and Reiser 2001. Range information from CNDDB (CDFW 2022a), CNPS 2022, and SDNHM Plant Atlas Project 2022.</p> <p>Special Status wildlife information from CDFW 2022c. Nomenclature and invertebrate descriptions from Eriksen and Belk 1999 and Shiraiwa 2010. Nomenclature and vertebrate descriptions from Bradley et al. 2014, Chesser et al. 2021, SSAR 2022, Stebbins 2003, Thompson et al. 2016, Tremor et al. 2017, Unitt 2004, and Zeiner et al. 1990.</p>				

Appendix E

**2022 Dry Season Fairy Shrimp Survey for Trestle Bridge
Removal and High Head Pump Station References**

2022 DRY SEASON FAIRY SHRIMP SURVEY FOR TRESTLE BRIDGE REMOVAL AND HIGH HEAD PUMP STATION ROAD REPAIR

PREPARED FOR:

Otay Water District
2554 Sweetwater Springs Boulevard
Spring Valley, CA 91978
Contact: Ms. Lisa Coburn-Boyd, Environmental Compliance Specialist
(619) 670-2219

PREPARED BY:

ICF
525 B Street, Suite 1700
San Diego, California 92101

July 2022



ICF. 2022. *2022 Dry Season Fairy Shrimp Survey for Trestle Bridge Removal and High Head Pump Station Road Repair*. July.

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1.0 Introduction

This dry season fairy shrimp survey was conducted to support two projects proposed by Otay Water District in the East Otay Mesa/Otay River area: the Trestle Bridge Removal Project and repair of bypass road at the High Head Pump Station (Figure 1).

The proposed Trestle Bridge Removal Project consists of the demolition of a steel trestle and removal of an abandoned 24-inch water pipeline in the east Otay Mesa area over the Otay River (Figure 2). The existing water pipeline is no longer in service and the District intends to remove the trestle and pipeline to address liability concerns. Three shallow road ruts (OWD-3 through -5; see Figure 3) were observed in established dirt roads approaching the work areas and were sampled in this survey. Of these two were on the road heading upslope, to the south of the Otay River, and one on County Park land in a flat area adjacent to recent campground construction.

The High Head Pump Station is northwest of the George Bailey Detention center on east Otay Mesa (Figure 2). The dirt road bypassing the pump station on the eastern slope requires stabilization. Two shallow ruts were observed and were sampled (OWD-1 and OWD-2).

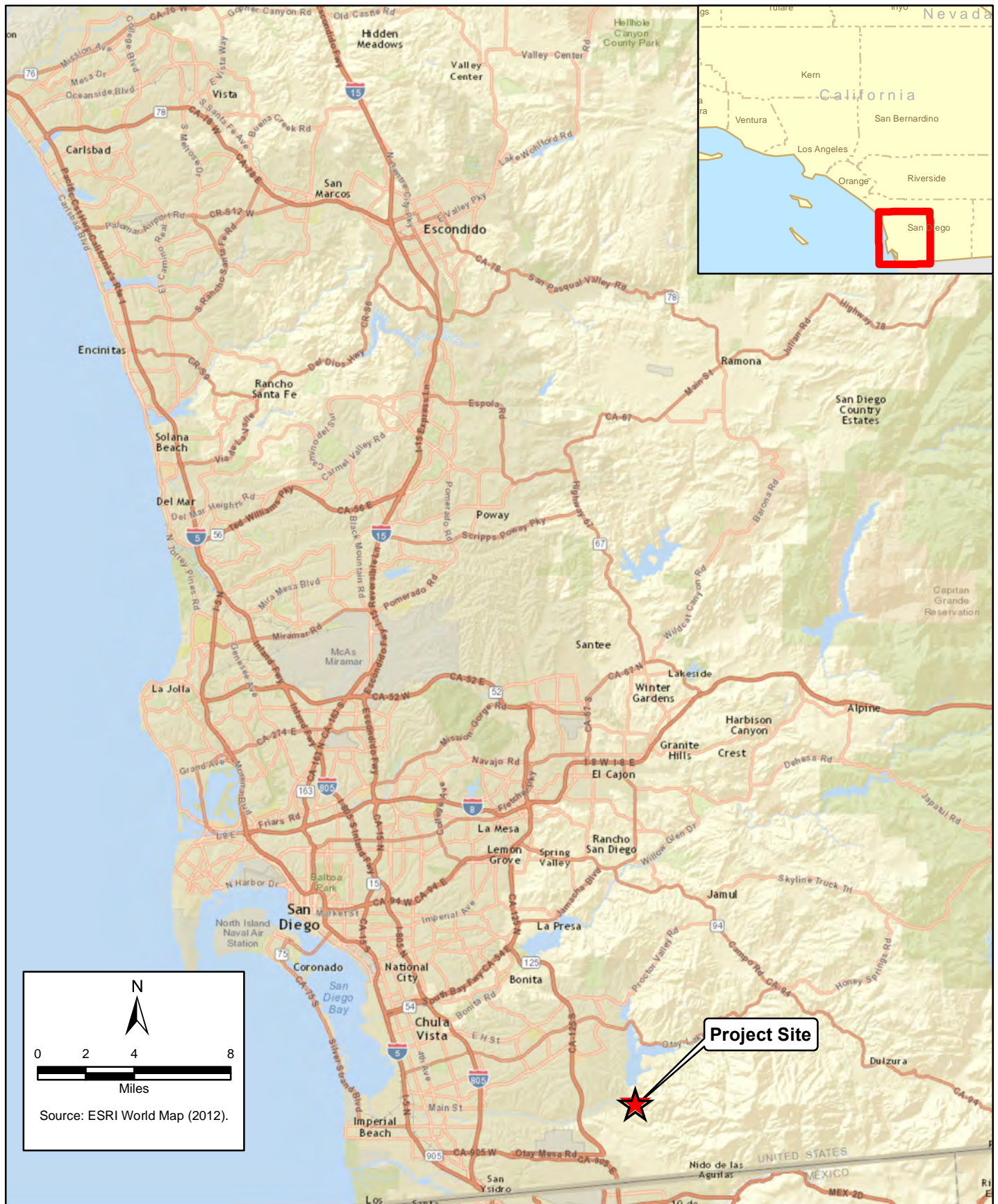
The goal of this survey was to determine presence or absence of listed large branchiopods (fairy shrimp) in seasonally inundated depressions (Figure 3), for use in avoiding take of listed large branchiopods. The listed large branchiopods known from freshwater in southern San Diego County are San Diego fairy shrimp (*Branchinecta sandiegonensis*) and Riverside fairy shrimp (*Streptocephalus woottoni*).

2.0 Methods

ICF conducted protocol level dry season surveys on five seasonally inundated basins (road ruts) located within east Otay Mesa vicinity (Figure 3). Survey methodology follows the USFWS *Survey Guidelines for the Listed Large Branchiopods* (Guidelines; USFWS 2017) as described below. Prior to initiating the surveys, a pre-survey notification letter was sent to the USFWS Carlsbad Fish and Wildlife Office informing intent to conduct a protocol dry season survey for listed fairy shrimp (Appendix A).

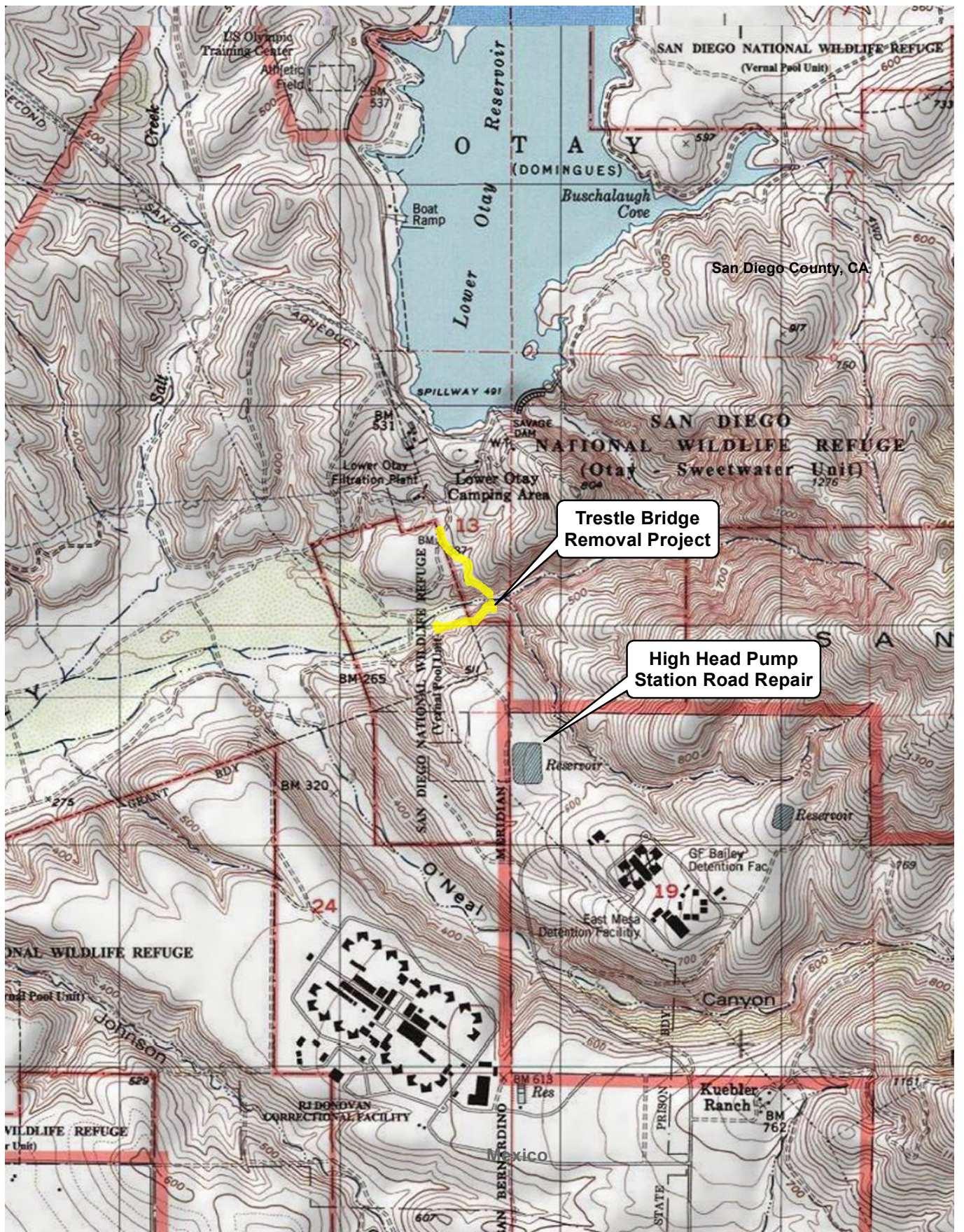
2.1 Soil Collection

On May 19, 2022, fairy shrimp biologists Brian Lohstroh (Permit# TE- 063608-6) collected soil samples for the dry season survey. Soil samples were collected when seasonally inundated depressions were dry. A hand trowel was used to collect soil samples from the top 1-3 centimeters of depressions soil. Whenever possible, soil samples were collected in chunks and the trowel was used to pry up intact chunks of sediment. Loosening the soil by raking or shoveling was avoided as such methods can damage cysts. Ten samples of approximately 50-milliliter (ml) aliquots were removed at each small rut (for a total of 0.5 liter/ponded area), ensuring that no more than 10% of the sampled basin's surface area was disturbed. Soil samples were collected mainly from the lowest topographic areas within the sampled features. Representative photos of the ruts are included in Appendix B.



**Figure 1: Regional Location
Otay Water District Projects**

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0 1,000 2,000 Feet
1:24,000
Source: USGS-Otay Mesa 7.5' Quad

Figure 2
Project Location

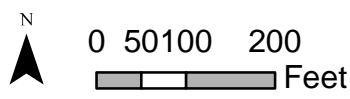


Figure 3
Basins Dry Sampled in 2022
Otay Water District

2.2 Soil Processing and Analysis

Soil samples were processed by ICF fairy shrimp biologist and USFWS permitted cyst-identifier Dale Ritenour (Permit# TE-58888A-2.1) in accordance with the Guidelines. The soil samples were measured into ten individual plastic containers. These samples were hydrated in tap water then washed through a set of sieves. Material passing through a Number 45 (355 micrometer) USA Standard Testing Sieve, A.S.T.M.E.-11 specification was caught on a Number 70 (212 micrometer) Sieve. The 355-micrometer sieve allowed the passage of cysts while the 212- micrometer sieves was selected as the appropriate size to collect cysts from large branchiopods whose ranges include the study area in southern San Diego County, consisting of San Diego fairy shrimp, Lindahl's fairy shrimp (*Branchinecta lindahl*), and Riverside fairy shrimp. The 212-micrometer sample material was rinsed into a container with approximately 200 milliliters of a saturated brine solution to float organic material, including fairy shrimp cysts. The material floating on the brine was decanted onto a paper filter. The organic material collected on the paper was examined under a stereo zoom microscope. Distinctive fairy shrimp cysts were counted if present. All sieves were soaked in a bleach solution and then thoroughly cleaned after completion of the procedure for each depression, to ensure no cysts adhered to the surfaces of the sieves.

Fairy shrimp cysts would be identified to the genus level through microscope examination, if they were observed. *Streptocephalus* cysts can be discerned from *Branchinecta* cysts based on cyst surface characteristics. Riverside fairy shrimp is the only member of the *Streptocephalus* genus known from San Diego County; therefore any observed *Streptocephalus* cysts would be accepted as Riverside fairy shrimp. *Branchinecta sandiegonensis* and *B. lindahl* are both known to occur in the Otay region. Their cysts are similar in appearance and have partial overlap in size and may not be conclusively separated under the microscope. Therefore, if *Branchinecta* cysts were observed, a wet season survey would be needed to confirm which *Branchinecta* species were present in the depressions.

3.0 Results and Discussion

No fairy shrimp cysts were observed in samples from any of the five sampled depressions in the 2022 dry season survey (Table 1 and Appendix C).

Table 1. Dry Season Sampling Results

Basin	Shrimp cysts species observed	Total # of cysts observed
OWD-1	None	0
OWD-2	None	0
OWD-3	None	0
OWD-4	None	0
OWD-5	None	0

The sampled ruts have no potential to support Riverside fairy shrimp. Riverside fairy shrimp require a minimum of 30 days of ponding to reach maturity and produce a sustaining population (Eriksen and Belk 1999). Riverside fairy shrimp are typically found in stock ponds, detention basins, and other large pools, though have been observed on Otay Mesa in relatively small (5 square meter) but deep basins on heavy clay soils in vernal pool preserves and dirt bike jump depressions (Ritenour pers. obsv.). The ruts sampled for these projects were very small (<1 square meter) and shallow (<10 cm deep) features with limited watersheds. Without large size, extended depth, and/or

uncommonly large watersheds, basins do not have hydroperiod and ponding extended long enough to support the life cycle of Riverside fairy shrimp.

All five of the sampled road ruts are shallow and isolated features, which made them unlikely to support fairy shrimp. The sampled ruts were assessed to have low potential to support San Diego fairy shrimp prior to sampling, but this dry season survey was conducted to provide information on potential occupancy. San Diego fairy shrimp are known from vernal pool preserves in the vicinity, and well as large basins on terraces below in the Otay River Valley, so the potential was not discounted. In the Otay Mesa region, fairy shrimp are frequently found within road ruts, as mud carried on vehicles can move cysts and introduce the species into new habitat, as well as some potential for cysts to be moved by waterfowl, shorebirds, or other wildlife. The vernal pool preserves in the vicinity of these two projects are fenced, which vastly reduces potential for vehicular transmission from vernal pools into road ruts within the project sites. Because of the lack of cysts in these ruts, the ruts are expected to no be occupied habitat of fairy shrimp.

4.0 References

Erickson, C. and D. Belk. 1999. *Fairy shrimps of California's puddles, pools, and playas*. Mad River Press, 141 Carter Lane, Eureka, California 95503. 196 pp.

U.S. Fish and Wildlife Service (USFWS). 2017. *Survey Guidelines for the Listed Large Branchiopods*. November 13.

5.0 Certification

We certify that the information in this survey report and attached exhibits fully and accurately represent my work.



July 26, 2022

Dale Ritenour (Permit No. TE-58888A-2.1)

Date

Vernal Pool Biologist

Author and USFWS Approved Cyst Identifier



July 26, 2022

Brian Lohstroh (Permit No. TE- 063608-6)

Date

Vernal Pool Biologist

Soil Collection

Appendix A

USFWS Notification



May 11, 2022

Ms. Stacey Love
Recovery Permit Coordinator
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, CA 92008

RE: 15-Day Notice for Protocol Dry Season Surveys for Listed Vernal Pool Branchiopods for Otay Water District Areas

Dear Ms. Love:

Otay Water District has requested that ICF conduct dry season fairy shrimp surveys for listed vernal pool branchiopods within road ruts at two sites. Both sites are at the edge of Otay Mesa, San Diego County (Figure 1). Project Area 1 is situated approximately 0.5 mile south of the Lower Otay Lake, northwest of the George F. Bailey Detention Facility, and north of the OWD Roll Reservoir. Project Area 2 is the dirt road adjacent to the High Head Pump station immediately northeast of Roll Reservoir. Both sites are located within the Otay Mesa U.S. Geological Survey (USGS) 7.5-minute quadrangle map (Figure 2).

Sampling will be conducted on a total of approximately four road ruts in established dirt roads.

The dry season survey will be conducted according to the United States Fish and Wildlife Service (USFWS) Survey Guidelines for Listed Large Brachiopods (USFWS Rev. Nov 13, 2017). Soil will be collected by permitted fairy shrimp biologist Brian Lohstroh (TE-063608-6). Soil processing and cyst analysis will be conducted by Dale Ritenour (TE-58888A-2.1), a biologist who holds a valid 10(a)1(A) recovery permit for the listed large branchiopods with additional terms conditions included in his permit specifically for conducting processing, isolating, and identifying listed large branchiopod.

Please do not hesitate to contact me with any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Dale Ritenour", written in a cursive style.

Dale Ritenour
TE-58888A-2.1
(858) 444-3958
Dale.ritenour@icf.com

Attachments:

Figure 1
Figure 2

Appendix B

Representative Photographs

2022 Dry Season Fairy Shrimp Survey Report Appendix B



Photo 1

Representative overview
of OWD-1 adjacent to
High Head Pump Station

Photographer:
B. Lohstroh

May 19, 2022



Photo 2

Representative overview
of OWD-2 adjacent to
High Head Pump Station.

Photographer:
B. Lohstroh

May 19, 2022

2022 Dry Season Fairy Shrimp Survey Report Appendix B



Photo 3

Representative overview
of OWD-3

Photographer:
B. Lohstroh

May 19, 2022



Photo 4

Representative overview
of OWD-4.

Photographer:
B. Lohstroh

May 19, 2022

2022 Dry Season Fairy Shrimp Report Survey Appendix B



Photo 5

Representative overview
of OWD-5 next to new
Otay Lakes Campground
site

Photographer:
B. Lohstroh

May 19, 2022

Appendix C
USFWS Dry Season Data Sheet

Project Information

Quad: Otay Mesa

Township: 1 B

Range: 1 W

Section: _____

Name of Person(s) Who Conducted the Following Tasks and Permit Number(s):
 Soil Collection: Brian Lehigh
 Soil Processing: DALE RITENOUR
 Soil Analysis/Cysts ID: DALE RITENOUR
 Soil Collection Date: MAY 19, 2022

Soil Collection Date: MAY 19, 2022

[illegible]

Cultural Resources Constraints Assessment

CULTURAL RESOURCES SURVEY FOR THE I.D. 7 OTAY TRESTLE DEMOLITION PROJECT, SAN DIEGO COUNTY, CALIFORNIA

PREPARED FOR:

Otay Water District
2554 Sweetwater Springs Boulevard
Spring Valley, California 91978-2096
Contact: Lisa Coburn-Boyd
619.670.2219

PREPARED BY:

ICF
525 B Street, Suite 1700
San Diego, California 92101
Contact: Patrick McGinnis
858.444.3947

July 2021



ICF. 2021. *Cultural Resources Survey for the I.D. 7 Otay Trestle Demolition Project, San Diego County, California*. July. (ICF #198.20). Prepared for Otay Water District, Spring Valley, CA.

Author(s): Patrick McGinnis, MA, RPA and Katherine Sinsky, MA, RPA

Consulting Firm: ICF
525 B Street, Suite 1700
San Diego, CA 92101
858.444.3928

Client: Otay Water District

Report Date: July 2021

Report Title: Cultural Resources Survey for the I.D. 7 Otay Trestle Demolition Project, San Diego County, California

Type of Study: Phase I Field Survey and Impacts Assessment

New Sites: Otay Trestle

Updated Sites: CA-SDI-10668

USGS Quadrangle: Otay Mesa, California: 7.5' series (1:24,000)

Acreage: 5.1 acres, pedestrian surveyed

Keywords: Cultural Resources Survey and Inventory

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Executive Summary

This report presents the results of a cultural resources survey and evaluation for the I.D. 7 Otay Trestle Demolition Project in Otay Valley, San Diego County, California. The I.D. 7 Otay Trestle and Pipeline Demolition is a Capital Improvement Project (P2460) for Otay Water District (OWD) consisting of the demolition of a steel trestle and removal of a water pipeline in Otay Mesa. Constructed in the 1960s, the north/south-trending steel trestle holds a 24-inch pipeline that crosses the Otay River. The pipeline was replaced by the Central Area and Otay Mesa Interconnection Pipeline in 2001. The trestle also carries a high pressure gas line that had supplied the 870-1 Pump Station, which previously prevented the demolition of the trestle. San Diego Gas & Electric Company abandoned this gas line in 2017 and replaced it with a feed from the south. The existing water pipeline is no longer in service, and OWD intends to remove the trestle and pipeline to address liability concerns. The pipeline is located just south of the City of San Diego Otay Water Treatment Plant and the Lower Otay Reservoir.

The survey and evaluation was completed to satisfy requirements of the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code 21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations, 15000 et seq.), which require agencies to evaluate their projects for the potential to cause significant impacts on archaeological resources.

A records review revealed that one archaeological site has been documented as partially intersecting the project area, site CA-SDI-10668. The review showed 14 additional previously recorded historic and prehistoric sites within a 0.25-mile buffer of the project location. These sites are not expected to be impacted by proposed project activities.

ICF archaeologists Katherine Sinsky, MA, RPA, and Hector Galvez, BA, performed a pedestrian survey and inventory of the project area on June 18, 2021. The survey did not identify any new archaeological resources and did not relocate the existing site in the project area. If unanticipated discoveries are made during construction, ICF recommends that mitigation measure Cul-2D, as identified in the 2015 Otay Water Facilities Master Plan Update Program Environmental Impact Report, be implemented. Mitigation measure Cul-2D outlines procedures for the unanticipated discovery of archaeological resources during ground-disturbing activities.

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Acronyms and Abbreviations

AMSL	above mean sea level
BP	before present
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CRHR	California Register of Historical Resources
NAHC	Native American Heritage Commission
NRHP	National Register of Historic Places
OWD	Otay Water District
PRC	Public Resources Code
project	I.D. 7 Otay Trestle Demolition Project
SCIC	South Coastal Information Center
SDG&E	San Diego Gas & Electric Company
USGS	U.S. Geological Survey

Chapter 1

Introduction

ICF was contracted to assist the Otay Water District (OWD) with the preparation of a Phase I Cultural Resources Survey report for the I.D. 7 Otay Mesa Trestle Demolition Project, in Otay Valley, San Diego County. OWD proposes to demolish an existing aboveground pipeline and bridge that currently supports abandoned water and gas lines that span the Otay River. This survey report included a records search of the survey area from the South Coastal Information Center (SCIC), a California Native American Heritage Commission (NAHC) file search, Native American outreach letters, and an intensive pedestrian survey of the project area.

Constructed in the 1960s, the steel trestle holds a defunct 24-inch pipeline that was replaced by the Central Area and Otay Mesa Interconnection Pipeline in 2001. The trestle also carries a high-pressure gas line that had supplied the 870-1 Pump Station, which previously prevented the pipeline bridge from being demolished. San Diego Gas & Electric Company (SDG&E) abandoned this gas line in 2017 and replaced it with a feed from the south. Because the pipeline is no longer in use, OWD aims to demolish it to address liability concerns.

The project area spans a narrow canyon south of the Lower Otay Reservoir, where a tributary to the Otay River is intersected by the bridge and pipeline. The site is located in the unincorporated community of Otay, in San Diego County (Figure 1), approximately ½-mile south of the Lower Otay Lake and northwest of the George F. Bailey Detention Facility.

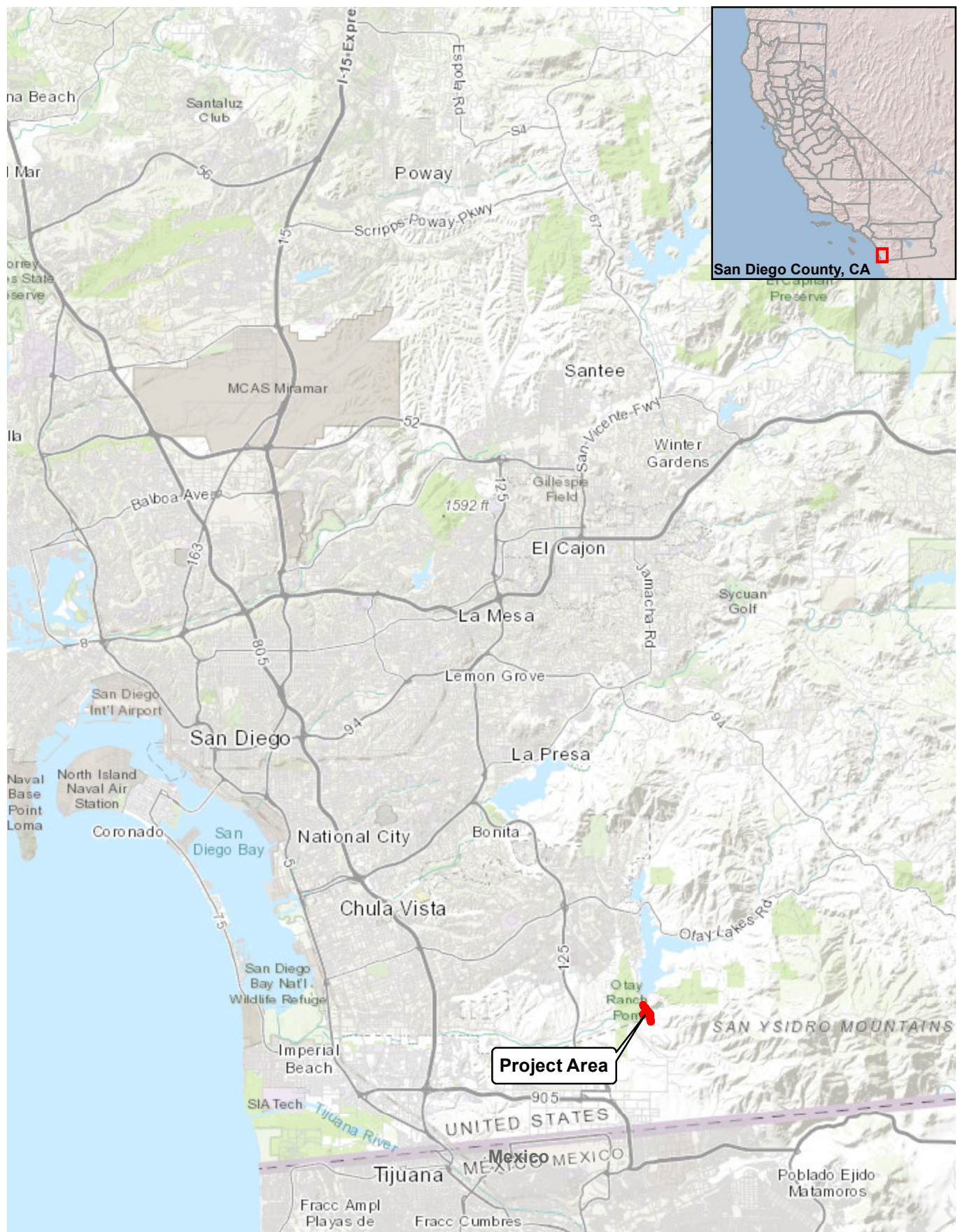
ICF conducted an extensive evaluation for the project, which included a review of archaeological and historical records in addition to an archaeological survey of the project area. This Phase I Cultural Resources report includes a brief history of the property, discussion of the regional role of identified cultural resources, and management guidelines for handling potentially significant cultural resources.

The project must comply with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code [PRC] 21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations, 15000 et seq.), which require evaluation of the historical significance of cultural resources and the significance of potential adverse effects on lands planned for development or ground disturbance. ICF was retained to perform an archaeological survey and inventory to support the project's CEQA review. This technical report describes the methods and results of the study and provides technical recommendations.

Project Area

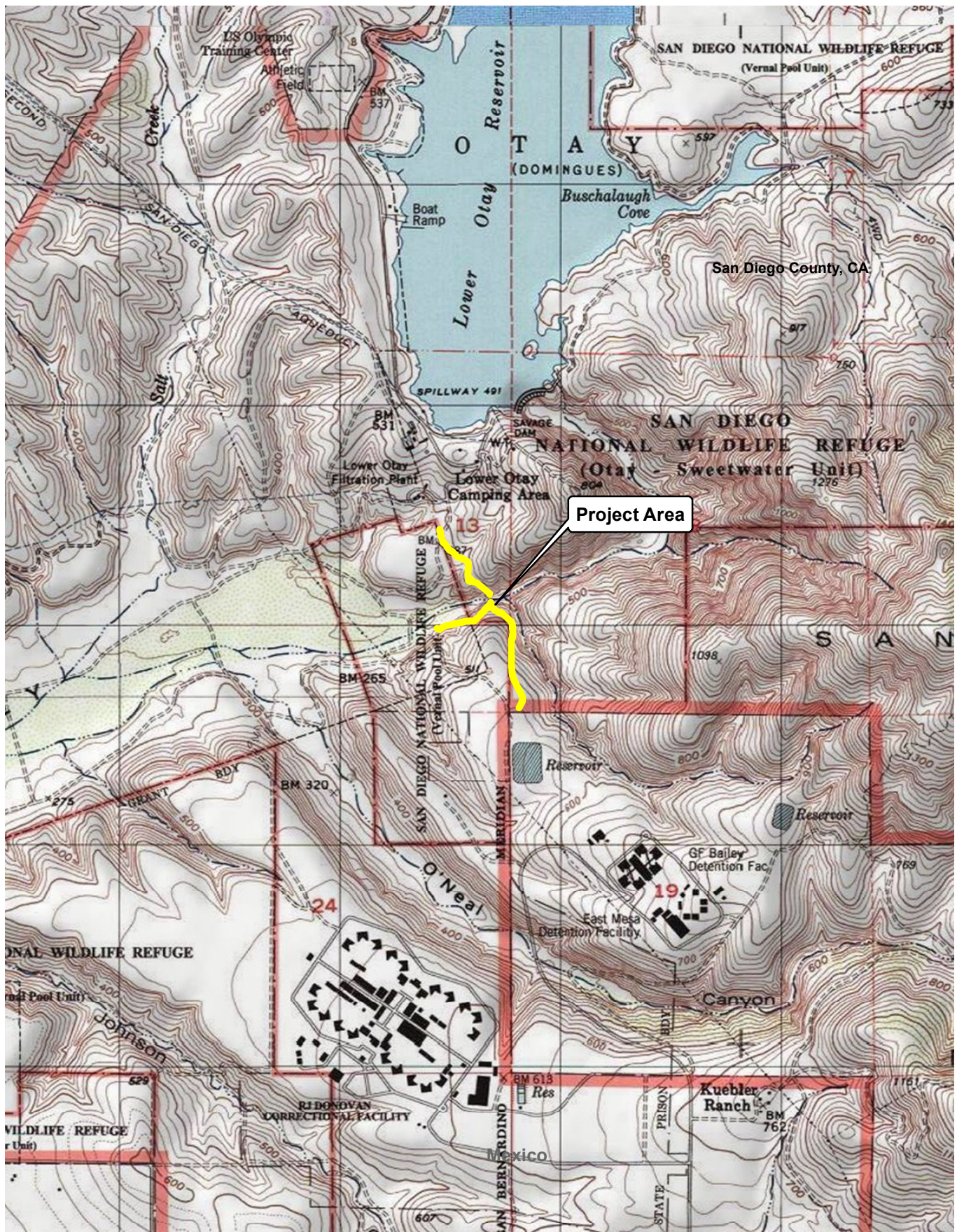
The project is in the community of Otay Mesa in eastern San Diego County. The project area is in Township 18 South, Range 1 West and East; however, its western portion is part of the Otay-Estudillo land grant and is not included in the Township and Range system. The trestle and access routes are situated on the U.S. Geological Survey (USGS) Otay Mesa 7.5-minute quadrangle map (Figure 2). The 5-acre project area consists of the exposed portion of pipeline spanning the Otay River, its access roads to the north and southwest, and a 50-foot buffer.

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0 2 4
Miles
1:250,000
Source: USGS-ESRI Imagery, 2019

Figure 1
Project Vicinity



0 1,000 2,000
Feet

1:24,000
Source: USGS-ESRI Imagery, 2019

Legend

Project Area

Figure 2
Project Location

Regulatory Context

State regulations recognize the public's interest in cultural resources and the public benefit in preserving them. These laws and regulations require analysts to consider how a project might affect cultural resources and to take steps to avoid or reduce potential damage to them. A cultural resource can be considered any property valued (monetarily, aesthetically, or religiously) by a group of people. Valued properties can be historical in character or date to the precontact past (i.e., the time prior to contact with European-Americans).

The project is subject to the rules and regulations that govern the treatment of archaeological sites in the state of California. The following summarizes the cultural resources regulations that apply to the project.

State Regulations

California Environmental Quality Act

CEQA is the primary regulation that guides the need for environmental review in California. The purpose of CEQA is to consider whether a project would result in adverse effects on the environment and whether any effects could be reduced or mitigated. Any projects undertaken by a public agency or any discretionary projects (i.e., projects that require the exercise of judgment or deliberation by a public agency) performed by private parties are subject to the CEQA process. Under CEQA, "historical resources" are considered part of the environment and are therefore protected. *Historical resources* (State CEQA Guidelines Section 15064.5(a)) are defined as:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register of Historical Resources (CRHR) (Public Resources Code [PRC] Section 5024.1, Title 14 California Code of Regulations [CCR], Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k), or identified as significant in an historical resource survey meeting the requirements of PRC Section 5024.1(g).
- Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC Section 5024.1, 14 CCR 4852), which parallel the National Register of Historic Places (NRHP) criteria but consider state and local significance.

Even in instances where a resource is not listed in, nor determined eligible for listing in, the CRHR; not included in a local register of historical resources; or not identified in an historical resources survey, a lead agency may still determine that a resource is a historical resource as defined in PRC Section 5020.1(j) or 5024.1. If it is determined that a project would result in a substantial adverse change to the significance of a historical resource, then that project would have a "significant effect" on the environment.

CEQA also contains provisions regarding the protection of Native American remains (State CEQA Guidelines Section 15064.5(d) and (e)). In the event that a study identifies the existence of, or likelihood of, Native American remains, the lead agency must work with the appropriate Native

Americans as identified by the NAHC as provided in PRC Section 5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains, and any items associated with Native American burials, with the appropriate Native Americans as identified by the NAHC.

Local Regulations

San Diego County Local Register of Historical Resources

San Diego County requires that resource importance be assessed not only at the state level, as required by CEQA, but at the local level if a resource meets any of the local register criteria, which parallel the NRHP criteria but consider resource significance at the county and local levels.

Environmental Setting

The following summarizes the key characteristics of the project area's natural and cultural setting. Discussion of the natural setting includes geology, flora, and fauna, while discussion of the cultural setting summarizes the precontact, ethnographic, and historical cultural setting of the project vicinity.

Geology and Soils

Otay Mesa begins about 5 miles east of the Pacific Ocean, rising from an elevation of about 60 feet above mean sea level (AMSL) in the Tijuana River and Otay River mouths, to an elevation of around 500 feet AMSL on the mesa's west end. The Otay River Valley forms Otay Mesa's northern boundary, the southern slopes of which are steep and dissected by small drainages that cut into the northern edge of Otay Mesa and empty into the Otay River. The project area spans a canyon formed by the Otay River and adjacent terrace escarpments with elevations ranging from around 250 feet AMSL at the river level and just under 500 feet AMSL on the terraces above to the north and south.

The project area sits on one of a series of three marine terraces—the La Jolla, Lindavista, and Poway formations—that stretch along the coastline of metropolitan San Diego. Otay Mesa is part of the Linda Vista Terrace, which consists of nearshore marine and non-marine deposits composed from a cobble conglomerate with a reddish-brown coarse sand matrix dating from the early Pleistocene (Gallegos et al. 1998). The Lindavista Formation is overlain by the Otay Formation, which characterizes the exposed soils in the project area. The Otay Formation is composed of alluvial fan and fluvial deposits divided into a lower conglomerate, a middle gritstone, and an upper mud/sandstone (RECON 2013). The Otay and Lindavista formations sit atop the San Diego Formation, a late Pliocene formation that consists of an upper conglomerate and lower sandstone layer (Gallegos et al. 1998). The San Diego Formation is exposed in the upper walls of the canyons along the Otay River (Gallegos et al. 1998).

Soils in the surveyed area consist of San Miguel-Exchequer rocky silt loams on 9 to 70 percent slopes, and Otay Formation conglomerate in the center of the project area along the Otay River and to the west (Todd 2004). These soils develop on marine terraces and coastal foothills and are characterized as excessively to moderately well-drained loams to gravelly clay loams.

Santiago Peak Volcanics, a raw material for flaked stone tool production, was readily available to prehistoric populations on Otay Mesa and the adjacent San Ysidro Mountains. The material occurs in cobble and block form throughout the Lindavista Formation and is easily obtainable as it erodes out of its matrix. Santiago Peak Volcanics also occur as bedrock outcrops, blocks, and veins on the sides of Otay Mountain (Price and Zepeda-Herman 2013).

Flora

Prior to European settlement, Otay Mesa was covered with a combination of vernal pool and perennial grassland areas interspersed with coastal sage scrub and maritime succulent scrub communities. The Otay River Valley and smaller drainages would have supported moderate to dense chamise chaparral communities that would have extended across the mesa (Price and Zepeda-Herman 2013). The Otay River Valley would have supported extensive riparian communities including southern willow scrub, possibly southern cottonwood-willow riparian forest, and potentially patches of southern coast live oak riparian forest along the lower north-facing slopes (Gallegos et al. 1998). Flora within and around the project area that would have been important resources to Native Americans includes manzanita (*Arctostaphylos* sp.), white sage (*Salvia apiana*), coastal sage brush (*Artemisia californica*), buckwheat (*Eriogonum fasciculatum*), elderberry (*Sambus mexicana*), and laurel sumac (*Malosma laurina*) (Pignuolo and Baksh 1998).

Historic farming and grazing on the mesa led to the widespread introduction of nonnative grasses, which now cover much of the undeveloped mesa top land in and around the project area. Vegetation communities and land cover types documented within the project area include coastal sage scrub, southern mixed chaparral, and disturbed habitat dominated by nonnative grasses.

Fauna

Prior to the historic period, terrestrial faunal resources in the region included, but were not limited to, grizzly bear (*Ursus horribilis*), black bear (*Ursus americanus*), mountain lion (*Felis concolor*), bobcat (*Lynx rufus*), mule deer (*Odocoileus hemionus*), coyote (*Canis latrans*), gray fox (*Urocyon cinereoargenteus*), badger (*Taxidea taxus*), ringtail (*Bassariscus astutus*), raccoon (*Procyon lotor*), jackrabbit (*Lepus californicus*), brush rabbit (*Sylvilagus bachmani*), cottontail rabbit (*Sylvilagus audubonii*), ground squirrel (*Spermophilus beecheyi*), woodrat (*Neotoma fuscipes*), and pocket gopher (*Thomomys bottae*) (Burt and Grossenheider 1976).

Cultural Setting

Precontact Setting

The project area is within the south coastal cultural region of California. Several cultural chronologies have been developed for the region (including, but not limited to, Moratto 1984, Bull 1987, Gallegos 1992, and Warren 1987), and this document uses a modified version of the cultural chronology developed by Gallegos (1992) and Gallegos et al. (1998) to help describe patterns in precontact cultural developments in the region. This chronology is an analytical construct and does not necessarily reflect Native American views. The following divides the precontact cultural sequence into three periods and summarizes the diagnostic attributes of archaeological components from each period.

Paleoindian Period (prior to 10,000 Before Present)

Traditionally, it was thought that the earliest human inhabitants of North America were highly mobile terrestrial hunters. Commonly referred to as the Clovis, these people used intricate bone and stone technology. On the west coast of North America, Clovis assemblages are characterized by a wide but sparse distribution of isolated tools and caches dated to between 12,800 and 12,500 years before present (BP) (Meltzer 2004). However, over the last few decades along the western coasts of North and South America, several archaeological sites and sets of human remains have been documented in island and mainland coastal contexts that date to the same period as the Clovis (see, e.g., Erlandson et al. 2007). These discoveries have forced researchers to reconsider how early humans migrated to the Americas and their land-use strategies—with a greater emphasis placed on coastal environments.

In the south coastal region of California, the earliest evidence of human occupation has been found on the Channel Islands (Rick et al. 2005). For example, in addition to the set of human remains dated to around 13,000 BP on Santa Rosa Island, an archaeological site dating to around 11,600 BP has been documented on San Miguel Island. The site contains numerous fish and shellfish remains, indicating an emphasis on marine resources (Rick et al. 2001). At least two archaeological sites along the mainland coast have been dated to prior to 10,000 BP, as well (e.g., Glassow et al. 2007). Although no coastal assemblages dated to earlier than 10,000 BP have been documented along the San Diego shoreline, it is inferred that the absence of sites is largely a function of a long-term trend in sea level rise, shoreline erosion, and lagoon infilling in the region. These trends are likely to have obscured and/or destroyed early coastal sites.

Archaic Period (10,000 to 1300 Before Present)

Evidence of human occupation of the San Diego region begins to appear at around 10,000 BP in the form of lithic assemblages composed of scrapers, scraper planes, cobble choppers, large blades, large projectile points, and crescentic stones of unknown function (Davis et al. 1969, Warren 1967). These items are attributed to a cultural complex locally referred to as the San Dieguito. Based on the range of artifact types, artifact frequency, and distribution of archaeological sites, the San Dieguito are thought to have used a generalized terrestrial hunting and gathering land-use strategy (Davis et al. 1969). However, at least one archaeological site dated to this period contains both ocean mammal bone and shellfish, indicating that coastal resources were also used (Gallegos 1991). Interestingly, because the archaeological contents of San Dieguito sites tend to differ from coastal sites located farther north and include items typically associated with early Great Basin cultures (i.e., crescentic stones) (Moratto 1984), researchers have argued that the San Dieguito are descendants of groups that migrated out of the Great Basin region after the great Pleistocene lakes receded (e.g., Gallegos 1991).

Starting at around 8000 BP, shell middens with millstone assemblages began to appear along sloughs and lagoons. Although this complex was originally considered to be a separate cultural tradition—the La Jolla—several researchers have subsequently argued that the San Dieguito, La Jolla, and Pauma (an inland lithic tradition indicative of inland resource collection and processing) complexes were created by the same group. The differences between the various complexes are thought to be a function of localized differences in the types of resources that were being collected and processed, rather than a difference in cultural affiliation (Vaughan 1982, Gallegos 1987)

It appears that after around 4000 BP the frequency of coastal archaeological sites in the San Diego region began to decline. Several mechanisms for this apparent decline have been postulated, including, but not limited to, the infilling of shallow lagoons during this period (Gallegos 1985, 1992; Masters and Gallegos 1997) and poor visibility/preservation of archaeological sites from this period related to local geomorphic factors (Waters et al. 1999).

Late Prehistoric Period (1300 to around 450 Before Present)

Starting at around 1300 BP, the archaeological record reflects the emergence of two cultural traditions in the San Diego region. The range and spatial distribution of site types, as well as site constituents for both traditions, are thought to reflect the ethnographically observed lifeways of the Kumeyaay and Luiseño peoples (Moratto 1984). Although these two groups have clear linguistic and cultural distinctions, both appear to have designed their land uses around the intensive exploitation of a range of local resources and established permanent to semi-permanent villages from the coast to the mountains and foothills. Both groups also adopted the use of small projectile points, pottery, and intensified use of acorns (True 1970).

Based on ethnographic data, the boundary between the lands of the Kumeyaay (to the south) and Luiseño (to the north) peoples occurred in the vicinity of Agua Hedionda and Batiquitos Lagoon (Kroeber 1925). It is unknown, however, whether this boundary reflects a persistent spatial division between the two groups or the most recently recorded position of a boundary that fluctuated over time. Regardless, the project area is within an area inhabited by the Kumeyaay. Archaeological sites attributed to the Kumeyaay are characterized by a range of artifact types referred to as the *Cuyamaca complex*. The complex includes small triangular pressure-flaked projectile points, mortars, and pestles, drilled stone ornaments, olivella beads, a steatite industry, ceramics, and urn cremations. Archaeological sites attributed to the Luiseño (termed *the San Luis Rey complex*) contain a similar range of artifact types but tend to have lower frequencies of side-notched projectile points, ceramics and ceramic forms, and milling stones, and cremations tended to be ungathered (True 1970).

Ethnographic Setting

Otay Mesa was traditionally inhabited by the Kumeyaay people (previously referred to as the *Diegueño*), who spoke the *Tipai* dialect of the Yuman language. The Kumeyaay inhabited a region that contains present-day southern San Diego County, west and central Imperial County, and the Northern Baja peninsula (Spier 1923, Almstedt 1982). Speakers of the *Tipai* dialect traditionally lived south of the San Diego River, while speakers of the *Ipai* dialect traditionally lived north of the San Diego River (Langdon 1975, Hedges 1975).

The Kumeyaay used a wide range of environments for habitation and resource collection, including the coast, foothills, mountains, and desert (Almstedt 1982). In response to the wide-ranging conditions of these environments, the Kumeyaay used a range of settlement strategies. For example, residential mobility was commonly practiced in desert environments where resources were sparse and widely distributed (Hicks 1963), whereas large seasonal residential bases were established in the mountains and foothills (Almstedt 1982). In keeping with the wide range of environments that they inhabited, the Kumeyaay exploited a range of resources, including (but not limited to) terrestrial mammals, birds, fish, marine invertebrates, grasses, manzanita, sage, sunflowers, lemonade berry, chia, mesquite, agave, and acorns. The latter was particularly important because they could be processed and stored for long periods (Hicks 1963, Shackley 1984).

The documentary record for ethnographically named places attributed to the Kumeyaay is sparse, consisting of fewer than 60 named places (Luomala 1978). Review of the publicly available literature reveals no documented ethnographically named places within the project area. However, consultation with the affected tribes may result in the identification of previously undocumented ethnographically named places.

Historical Setting

The historical period began in the San Diego region between the late sixteenth century and the middle eighteenth century, which corresponds with the arrival of Spanish explorers. A brief history of the interaction between Native Americans, Europeans, and European-Americans that followed initial contact is provided below.

Native American History

The Kumeyaay first encountered Spanish explorers in any great number in 1796, when the Spanish established the Mission San Diego de Alcalá and, later, the Mission San Luis Rey de Francia in 1798. The missions used the local Native American inhabitants as laborers and attempted to convert them to Catholicism (Castillo 1978). At contact, it is thought that the Kumeyaay population numbered between 16,000 and 19,000 individuals (Shipek 1986). Following the establishment of the missions and the introduction of European diseases, the Kumeyaay population decreased dramatically. By the early 1820s, California came under Mexico's rule. Despite the transition, the Kumeyaay continued to be forced from their traditional lands and to work as laborers (Castillo 1978). As a result of this continued hardship and a period of political instability, many Native Americans participated in an uprising against the Mexican rancheros and left the missions and rancheros to live in their traditional villages (Shipek 1970). When California became a state in 1849, the Kumeyaay continued to receive harsh treatment (Castillo 1978).

As conflicts with encroaching European-Americans increased, the United States government entered into treaty negotiations with the Kumeyaay (referred to as the *Dieguiño* at the time) in 1852 to obtain exclusive rights to land and cessation of hostilities in exchange for allotted reservation land, payment, and European-American farming and industrial equipment (Kappler 1929, Shipek 1978). The treaty, referred to as the *1852 Treaty of Santa Ysabel*, was completed and sent to congress for ratification. Under pressure from settlers and a California Senate delegation, the treaty—and 17 other treaties—was rejected (Castillo 1978). After several years of additional encroachment by European-Americans, the United States congress passed the *1891 Act for the Relief of Mission Indians*. This act set aside reservation lands and trust lands—often small in size and lacking adequate water—for the Kumeyaay people. Today, many descendants of the Kumeyaay live within or near the 13 reservations of the Kumeyaay Bands or in surrounding communities (Shipek 1978).

European/European-American History

Spanish Period

The historic period in California began with the early explorations of Juan Cabrillo in 1542. Cabrillo came ashore on what is now Point Loma to claim the land for Spain and gave it the name San Miguel. Sixty years passed before another European, Sebastián Vizcaíno, entered the bay on November 10, 1602, and gave it the name San Diego. Although both expeditions encountered native inhabitants, there appears to have been little or no interaction. The first Spanish settlement in San Diego was

established in 1769 on Presidio Hill and consisted of a presidio (fort) and a chapel that also served as Alta California's first mission. In that same year, an expedition headed by Gaspar de Portolá traveled north from the Presidio de San Diego to extend the Spanish Empire from Baja California into Alta California by seeking out locations for a chain of presidios and missions in the area. This expedition led to the establishment of the San Diego, San Luis Rey, and San Juan Capistrano missions between 1769 and 1821 (Pourade 1960).

During the Spanish period, colonists introduced horses, cattle, sheep, pigs, corn, wheat, olives, and other agricultural goods and implements, as well as new architecture and methods of building construction (Englehardt 1920). Despite the economic prosperity of the missions, Spain maintained a tenuous grip on the region—a grip that was ultimately overcome by Spanish colonists in Alta California in 1822 with Mexico's independence from Spain (Pourade 1961, Rawls and Bean 2003).

Mexican Period

Following Mexico's independence from Spain in 1821, the Mexican period began in San Diego County and lasted until 1848, ending with the conclusion of the Mexican-American War. During this period, most Spanish laws and practices continued until shortly before secularization of Mission San Luis Rey, Mission San Juan Capistrano, and Mission San Diego de Alcalá. During the Mexican Period, former Presidio soldiers became civilian residents, the Pueblo of San Diego was established, and transportation routes were expanded. During the 1820s, the region's economic activity centered on agriculture and livestock-raising for subsistence and localized markets and hide and tallow production for the international market (Pourade 1961, Sherman 2001).

After years of political instability and several failed efforts to secularize the missions, in 1834 Governor José Figueroa issued a proclamation defining the terms of the secularization redistribution of mission lands that would occur over the following 2 years. This resulted in the distribution of approximately 500 private rancho land grants, mainly to officials and retired soldiers (Rawls and Bean 2003). The project area lies within the confines of Jamul Rancho, a land grant covering 8,926.22 acres, granted to Pio Pico in 1829 by Governor Jose Maria Echeandia (Rush 1965).

American Period

Mexico's defeat in the Mexican-American War in 1848 initiated the American period, when Mexico ceded California to the United States under the Treaty of Guadalupe Hidalgo. Subsequently, land ownership by the Mexicans living in California became a matter of considerable legal wrangling. In principle, the Treaty of Guadalupe Hidalgo protected Californios' (residents of California prior to its acquisition by the United States) property. In practice, however, the legal process for vetting land claims that was set into motion by the Land Commission established in 1851, combined with the mounting debts of many rancho owners, allowed Americans and other newcomers to take possession of nearly all of the rancho lands originally granted to Californios. Much of the land that once constituted rancho holdings became public land, available for settlement by emigrants to California.

The discovery of gold in the state, the conclusion of the Civil War, and the subsequent availability of free land through passage of the Homestead Act all resulted in an influx of people to California and the San Diego region after 1848. California's importance to the country as an agricultural area began in the latter half of the nineteenth century and was subsequently supported by the construction of connecting railways for the transportation of people and goods.

The completion of a transcontinental railroad connection to San Diego in the mid-1880s inaugurated the first land boom and saw the city of San Diego's population soar to over 35,000 in a few short years. The boom was felt throughout the region in the form of many newly formed towns and communities. Thousands of people came to the county to take advantage of the possibilities of the region. Paramount to the quest to develop the area was water acquisition, and late nineteenth century San Diego became a major focal point of dam construction in the world (Pryde 1984).

By the end of the 1880s, however, the "boom" had become a "bust" as banks failed, land prices plummeted, and speculation could not be sustained by true and beneficial economic growth. Thousands of people left the region, abandoning their significantly devalued properties to the tax assessors. However, not everyone left; many remained to form the foundations of small pioneering communities across the county. These families practiced dry farming, planted orchards, raised livestock, built schools and post offices, and created a life for themselves in the valleys and mesas of San Diego County (Griffin and Weeks 2004).

Historic Land Use in the Project Area and Vicinity

Otay Mesa

Otay Mesa developed slowly until the 1870s. In 1869 a stage route to Yuma was opened that ran across the mesa. Farming developed through the 1870s, and by 1879 most of the mesa was under intensive agriculture. Though the cultivated area was expansive, only about a dozen families lived on the mesa at the time, and the most widely grown crops were wheat, barley, corn, tomatoes, and beans (Robbins-Wade 2008).

Following the Civil War, acquisition of 160 acres of land to farm became a goal of thousands of young people and immigrants in the United States. Pioneer farmers wanted to establish small agricultural communities patterned after those they had left in the east. The settlement of Otay Mesa by pioneer farmers began in the 1880s. In 1885, four families lived on the mesa. Two years later in 1887, 40 households had been established on the mesa, constituting a community of 140, including 25 school-aged children. According to an 1886 article in the *San Diego Union*, the settlement consisted of "comfortable looking farmhouses and well-defined barns," situated on farms ranging from 160 to 320 acres (Gallegos et al. 1998). Individual farmsteads on the mesa made up a rural community centered around the Alta School. Farmers living in small rural communities were instrumental in the development of San Diego County as they fed growing urban populations and provided business for local markets. These kinds of settlements were the most prevalent type of community in San Diego County during the period (Van Wormer 1986).

Farming families obtained water for crops and household use from nearby streams, wells, and catchment basins, and by the early 1900s an extensive system of dams had developed to store runoff water (Price and Zepeda-Herman 2013).

Census records show fluctuating then declining population on the mesa during the turn of the century. Following droughts of the early 1900s, many farming families had left the mesa in search of work elsewhere. By 1910, only nine children were enrolled in Alta School. During the 1920s, a nationwide agricultural depression brought hard times for all San Diego County farmers, which became even worse with the Great Depression of the 1930s. This period of economic hardship saw an almost complete disappearance of rural farm schoolhouse communities in the county (Van Wormer 1986). One of the few to survive was the Alta School District community in Otay Mesa. After World War II, at least 16 families lived on the mesa, and the schoolhouse remained the center of the

community. Hay and grain continued to be staple crops on the mesa during the first half of the twentieth century; ranching and farming continued to be the main occupation of residents on the mesa throughout much of the twentieth century.

In the 1960s the Otay Municipal Water District brought a dependable water supply for irrigation to the mesa, resulting in changes in the types of crops grown there (Gallegos et al. 1998). Tomatoes became the dominant product, and other more water-intensive crops such as cucumbers, bell peppers, and celery were also grown. Hay and grain continued to be important, especially on the eastern part of the mesa (Van Wormer 1986).

The arrival of a dependable water supply brought development, though change occurred slowly, and the mesa remained a place of open fields through the mid-1970s. With the establishment of the second international border crossing in 1985, development accelerated with road improvements and construction of housing tracts and commercial and industrial complexes.

Further Research

The Otay Mesa area was brought into the land development process relatively late when compared to other areas of San Diego County, and it maintained a generally rural appearance through the mid-1970s. Review of historical maps and aerial images of the present project area shows that it has been subjected to limited historical development, likely due to its location across a steep canyon. 1953 aerial imagery shows a small structure approximately a quarter mile northwest of the current project location. It appears that in the 1950s the area was relatively undeveloped and had only two or three access roads and no structures in the general project vicinity. By 1964, the present trestle structure had been constructed, and large parts of the area were graded. Dirt roads in the area multiply by 1964 and construction had begun on the detention center approximately a half-mile from the project area. USGS historic topographic maps show that construction on facilities related to the water filtration plant around a half-mile northwest of the project area began between 1944 and 1957.

Chapter 2

Native American Outreach and Literature Review

As part of the due diligence for the project a Sacred Lands File search was requested from the NAHC on April 7, 2020. NAHC responded on April 27, 2020, with negative results indicated for cultural resources in the project vicinity. The NAHC also provided a list of 19 tribal contacts who may be able to provide additional information. On June 22, 2020, ICF sent outreach letters to all 19 individuals and organizations that may have knowledge of cultural resources in the study area. The letters described the proposed project and requested information on cultural resources in or nearby the study area. To date, no replies have been received from the contacted Tribes. Consultation between OWD and Native American tribes is ongoing. Native American correspondence is documented in Appendix A.

As part of the cultural resources study, ICF consulted previously conducted record searches conducted in 2018 with the SCIC that covered the project area and a 0.25-mile radius. The SCIC contains all cultural resource records from Imperial and San Diego counties. This records search revealed one cultural resource (CA-SDI-10668/P-37-01668) within the project area and another 14 cultural resources within 0.25-mile of the project area. A brief summary of the CA-SDI-10668 is provided below. The additional sites outside of the project area and within the 0.25-mile buffer include one historic homestead, a historic refuse dump, six prehistoric lithic scatters, and six prehistoric isolates (Table 1).

CA-SDI-10668/P-37-01668

CA-SDI-10668 is a large and sparse multicomponent site containing prehistoric lithic-related loci and historic refuse and built environment ruins dating to the 1930s. The site was first recorded in 1979 and updated in 1986, 2010, and 2013. The 1986 site update assessed the site as measuring 914 by 463 meters. At that time, additional artifacts were identified between site CA-SDI-00668 and surrounding sites CA-SDI-8655, CA-SDI-8656, and CA-SDI-7218, resulting in the four sites being combined as one large resource under the CA-SDI-10668 trinomial. The majority of the site was located where the East Mountain Detention Complex now stands, which resulted in the destruction of a large portion of the site. Site spatial data indicates that its northernmost edge intersects with the current project boundaries. The site has not been evaluated for its eligibility for listing on the NRHP or CRHR.

Table 1. Cultural Resources within 0.25-Mile of the Project Area

Primary No. (P-37-)	Trinomial (CA-SDI-)	Resource Type	Description	Recorder(s) and Date
010668	10668	Multicomponent site	Prehistoric quarry and lithic scatter, historic cistern and refuse scatter	Thesken 1979 Kyle 1986 Blotner 2010 AECOM 2013
011370	11370H	Historic site	Refuse scatter	RECON 1989
004737	4737	Prehistoric site	Prehistoric lithic reduction scatter and historic debris scatter	Waters 1971 Gallegos and Associates 1993
010862	10862	Historic site	Homestead structural remains, pads, reservoir, and trash scatter	RECON 1987
015391	15931	Prehistoric isolate	Single metavolcanic flake (collected)	Gallegos and Associates 1993
014535	--	Prehistoric isolate	Single lithic scraper	Brian F. Smith & Associates 1996
015388	15388	Prehistoric isolate	Single flake (collected)	Gallegos and Associates, 1993
015200	--	Prehistoric isolate	Lithics: one flake and one core (collected)	ERCE 1991
010667	10667	Prehistoric site	Lithic scatter	ERCE 1991
012936	12936	Prehistoric site	Lithic scatter	Hector 1992
010874	10874	Prehistoric site	Lithic scatter	WESTEC 1987
015385	--	Prehistoric isolate	Single flake	Gallegos and Associates 1993
015386	--	Prehistoric isolate	Two flakes	Gallegos and Associates 1993

A total of 27 cultural resources studies have been conducted within a 0.25-mile radius of the project area. Ten of these covered portions of the project area. One of these studies covered the entire project area, including the bridge and access roads.

Objectives

The objectives of this study included the following.

- Relocate previously documented archaeological resources.
- Identify previously undocumented archaeological and historic built resources.
- Evaluate all resources within the project area for their eligibility for listing in the NRHP based on surface-exposed and subsurface artifacts and features.
- Consider the project's impacts on resources within the project area.

Expectations

Analysis of the background information provided in Chapters 1 and 2 resulted in the development of the following expectations for the project area.

- Review of the geology of the project area reveals that much of it consists of bedrock or decomposing bedrock at the ground surface. Such areas would have the potential to contain surface-exposed archaeological deposits, but limited potential to contain buried archaeological deposits except in instances where anthropogenic filling has occurred. Areas around access roads on the north and south of the canyon form slopes over 40% and have low potential to contain either surface-exposed or buried archaeological deposits.
- Review of the precontact and ethnographic literature, as well as the record search, revealed that the project vicinity has a limited history of precontact use. The presence of small lithic scatters and isolates suggests that the area was used as a lithic procurement area. Given the current known extent of cultural resources in the area, it was considered possible that additional lithic artifacts associated with documented and previously undocumented precontact archaeological sites may be located within the project area.
- Limited development has occurred within the project area during the historic period. Therefore, it is anticipated that the project area will have limited potential to contain historic built resources or historical archaeological sites. Aerial imagery suggests that grading increased in the project area after 1955 and may have impacted existing resources. The project's location across a canyon suggests that historical flooding (e.g., the 1916 Flood) may have damaged, redeposited, or destroyed prehistoric sites along the river corridor.

Based on an examination of existing data, the likelihood for encountering archaeological sites in the project area is considered low. Across much of the project area, there is limited potential for encountering buried archaeological sites due to shallow soil deposition on the top of the mesa and steep terrain below.

Methods

To accomplish the objectives of this study, an intensive pedestrian survey and inventory was conducted. The purpose of the survey was to relocate documented archaeological resources and identify previously undocumented archaeological and historic built resources based on surface-exposed cultural materials.

Cultural Resources Survey and Inventory

ICF performed a cultural resources survey of the project area in accordance with OWD's CEQA procedures and 36 Code of Federal Regulations 60.4. The field effort consisted of surveying the access roads and pipeline structure for facilities associated with the project and within a 50-foot buffer, amounting to just over 5 acres.

Previous research suggests that one existing archaeological site (CA-SDI-10668) intersects with the project area. Because the trestle structure (built between 1954 and 1963) is over 50 years old, it requires recording and evaluation under CEQA. The trestle structure was examined and documented at the north and south ends; however, the section spanning the canyon was not surveyed due to safety concerns and lack of access. The area around existing site CA-SDI-10668 was more intensively inspected in 5-meter transects, and no cultural materials were identified.

During the survey, ICF archaeologists inspected the ground surface of the project footprint, access routes, and the area near where the existing site intersects with the project buffer. Record search data were loaded onto an iPad tablet with Collector software, which allowed surveyors to easily navigate and record field data using updated project and archaeological site spatial data.

This chapter summarizes the results of the Cultural Resources Survey field investigation. The investigation documented the now-historic trestle structure and updated forms for site CA-SDI-10668, which intersects the project area but was not relocated. Associated archaeological resource forms are included in Appendix A.

Cultural Resources Survey and Inventory

On June 18, 2021, ICF archeologists Katherine Sinsky and Hector Galvez performed an intensive pedestrian survey of the 5-acre project area. Survey coverage was moderate due to dense vegetation and steep drop offs on either side of the access roads. Steep terrain on the north side of the canyon prevented access to the trestle structure, and observations were made from an overlook to the west of where the pipeline dips underground. (Photos 1–3).



Photo 1. Overview of access route and Otay Valley facing west.



Photo 2. Bridge crossing over canyon, facing north.



Photo 3. Overview of project area, facing south.

One previously recorded site (CA-SDI-10668) intersects with the southern part of the project area and was surveyed around that intersection. No cultural materials associated with the site were identified. Confidential Figure 3 (Appendix C) shows the locations of these archaeological resources relative to the project area. A brief summary of the previously recorded archaeological resource and description of the Otay Trestle (which is over 50 years in age) follows.

CA-SDI-10668

CA-SDI-10668 is a large and sparse site that was first recorded by WESTEC in 1986 as a multi-component resource composed of a prehistoric quarry site and historic resource dated to circa 1930. According to WESTEC, prehistoric artifact types were consistent with a quarry site containing lithic scatters and flaking stations. Historic features included a mortar, cement, asphaltum, and rock cistern, broken glass, metal pipe, and cement trough. As part of WESTEC's interpretation, previously recorded sites CA-SDI-8656 and CA-SDI-7218 were subsumed under the CA-SDI-10668 designation.

The site was re-surveyed in 2010 by HDR as part of an SDG&E transmission line survey next to the detention center, and the site boundary was extended to encompass a new prehistoric artifact. In 2013 AECOM visited the site for a pole replacement survey and did not relocate any cultural materials. Previous site updates indicate that the main part of the site, located about 0.5-mile south of the project area, had been disturbed and destroyed with the construction of the East Mesa Detention Facility to the south. ICF surveyed in 5-meter transects within and around where the plotted site boundary intersects the project area, and no cultural materials were identified.

CA-SDI-10668 was a sparse lithic scatter of artifacts on the ground surface. Road construction and the construction of the detention facility appear to have destroyed the site. The site appears to have been an expedient tool making or cobble testing site in conjunction with its location on a mesa type, and subsurface deposits are unlikely to be associated with the resource. The site is not recommended eligible for the CRHR under Criterion D. Confidential Appendix A includes the CA-SDI-10668 update.

Otay Trestle

Constructed in the 1960s, the steel bridge holds a 24-inch pre-stressed concrete water pipeline that spans a canyon formed by the Otay River. Although, commonly called the Otay Trestle the bridge is actually a suspension bridge consisting of two approximately 15-foot-high triangular steel lattice towers with cross braces with approximately 1.5-inch-thick braided steel cables supporting a steel open box deck at both ends upon which the pipeline rests. A few concrete pylons set in the bedrock below support the bottom of the pipeline beyond the bridge abutments after it exits the canyon. The towers are set on concrete abutments supporting the bridge, which is suspended 40 to 50 feet above the riverbed. The abutments are likely supported by pilings set into the bedrock immediately below the ground surface. The suspension cables are anchored in concrete anchor blocks set back in the canyon slopes approximately 25 feet from each tower. The bridge is secured from unauthorized access with barbed wire and chain link fencing. The aboveground portion of the abandoned water and gas pipeline bridge is approximately 380 feet long and 6 feet at its widest to support pedestrian maintenance of the line. The pipeline bridge first appeared on historical aerial imagery between 1958 and 1961. According to Van Wormer (1986), this period marked the beginning of infrastructure initiatives aimed at bolstering the agricultural vitality of Otay Mesa. Water pipelines like this would increase the supply of consistent and reliable water for farms on the mesa. Appendix C includes the site form created for this resource.

As one of many pipelines that brought water to Otay Mesa neither the pipeline nor the bridge that supports it have made a significant contribution to the broad patterns of local or regional history under Criterion 1 of the eligibility criteria for listing on the CRHR. The pipeline was not responsible for an influx of development or agricultural activity in the area. No information could be found regarding the architect who designed the bridge or the contractor who built it. The pipeline and bridge did not require innovative construction methods and were built using common materials and construction methods that are ubiquitous and still used today. The pipeline and bridge do not represent the work of a master or possess high artistic values that would make it eligible under Criteria 2 or 3 for listing on the CRHR. The existing research and recording of the resource have exhausted its research potential. Further study or research into the resource will not yield information important to the history of the local area and the resource is recommended is not eligible for the CRHR under Criterion 4.

Chapter 5

Conclusions and Recommendations

Conclusions

The cultural resources survey did not identify any previously undocumented archaeological resources in the project area and did not relocate any components of the previously recorded intersecting resource, CA-SDI-10688. The historic Otay trestle structure, which is the focus of the present study, was documented and recorded as a new resource. None of these resources qualify for listing in the NRHP or CRHR.

Recommendations

Archaeological and Native American monitoring should be performed in accordance with the protocols outlined in mitigation measures Cul-2A, Cul-2C, and Cul-2D as identified in the 2015 Otay Water Facilities Master Plan Update PEIR.

If unanticipated discoveries are made during construction, ICF recommends that mitigation measure Cul-2D, as identified in the 2015 Otay Water Facilities Master Plan Update PEIR, be implemented. Mitigation measure Cul-2D outlines procedures for the unanticipated discovery of archaeological resources during ground-disturbing activities.

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Chapter 6

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California DPR 523 Forms (Confidential)

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Appendix B
Native American Consultation



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STATE OF CALIFORNIA

Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

April 20, 2020

Rachel Droessler
ICF

Via Email to: Rachel.droessler@icf.com

Re: Otay Water Trestle Project, San Diego County

Dear Ms. Droessler:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: steven.quinn@nahc.ca.gov.

Sincerely,

Steven Quinn
Cultural Resources Analyst

Attachment

**Native American Heritage Commission
Native American Contact List
San Diego County
4/20/2020**

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This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Otay Water Trestle Project, San Diego County.

**Native American Heritage Commission
Native American Contact List
San Diego County
4/20/2020**

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***Viejas Band of Kumeyaay
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***San Pasqual Band of Diegueno
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This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Otay Water Trestle Project, San Diego County.



June 23, 2020

Viejas Band of Kumeyaay Indians
John Christman, Chairperson
1 Viejas Grade Road
Alpine, CA, 91901

Subject: Otay Water District I.D. 7 Trestle and Pipeline Demolition Project – Due Diligence Outreach

Dear Mr. Christman:

The I.D. 7 Trestle and Pipeline Demolition Project is a current CIP project (P2460) for the Otay Water District. The project consists of the demolition of a steel trestle and removal of a water pipeline in the Otay Mesa area. Constructed in the 1960's, this steel trestle holds a 24-inch pipeline that crosses the Otay River. The pipeline was replaced by the Central Area and Otay Mesa Interconnection Pipeline in 2001. The trestle also carries a high-pressure gas line that supplies the 870-1 Pump Station which had prevented the trestle from being demolished previously. SDG&E abandoned this gas line in 2017 and replaced it with a feed from the south. The existing water pipeline is no longer in service and the District wants to remove the trestle and pipeline to address liability concerns. The pipeline is located south of the City of San Diego Otay Water Treatment Plant (Figure attached).

A cultural resources records search for the project identified one archaeological site, a prehistoric lithic scatter within the project area. A cultural resources survey of the project area is pending. The NAHC completed a search of the Sacred Lands File, which was negative for the presence of Native American sacred lands within the project area. The NAHC identify you as a person who may have concerns or knowledge of cultural resources in the project area. Any information you might be able to share about the project area would greatly enhance the study and would be most appreciated.

If you have any recommendations regarding the Project, please address them to me so that I can incorporate them into our draft report. As required by State law, all site data and other culturally sensitive information will not be released to the general public and will be kept strictly confidential. This outreach is for due diligence and not under AB52 or Section 106. I can be reached at 858-444-3947, or by email at Patrick.McGinnis@icf.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick McGinnis", enclosed within a thin black rectangular border.

Patrick McGinnis, MA
Archaeologist

Encl. Project Location Figure

Confidential Cultural Resources Location Map

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