



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT

Date of Notice: March 20, 2014

PUBLIC NOTICE OF A

DRAFT MITIGATED NEGATIVE DECLARATION

WBS No.: 21002131

The City of San Diego Advanced Planning & Engineering Division of the Development Services Department has prepared a draft Mitigated Negative Declaration (MND) for the following project and is inviting your comments regarding the adequacy of the document. The draft MND has been placed on the City of San Diego web-site at:

<http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>

Your comments must be received by April 21, 2014 to be included in the final document considered by the decision-making authorities. Please send your written comments to the following address: **Myra Herrmann, Environmental Planner, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101** or e-mail your comments to DSDEAS@sandiego.gov with the **Project Name and Number in the subject line.**

The documents related to the Community Plan Amendments (CPA) and Natural Resources Management Plan (NRMP) for this project can be found on the following City website:

<http://www.sandiego.gov/planning/community/profiles/delmarmesa/plan.shtml>

General Project Information:

- Project Name: **CARMEL MOUNTAIN/DEL MAR MESA TRAILS COMMUNITY PLAN AMENDMENTS AND NATURAL RESOURCES MANAGEMENT PLAN ADOPTION**
- Project No. N/A / SCH No. *Pending*
- Community Plan Areas: **Carmel Valley, Del Mar Mesa, Pacific Highlands Ranch, Torrey Highlands, Rancho Peñasquitos**
- Council Districts: **1, 5 & 6**

Subject: CITY COUNCIL APPROVAL to allow for the adoption of Amendments to the following land use plans: Del Mar Mesa, Carmel Valley (Neighborhood 8A), Pacific Highlands Ranch, Rancho Peñasquitos, and Torrey Highlands to revise the planned trail system in five northern communities; adoption of the Carmel Mountain and Del Mar Mesa Natural Resources Management Plan (NRMP) and Easement Vacations within the Preserves. The purpose of the Community Plan Amendments (CPA) is to incorporate a trail system that will be implemented in accordance with the Carmel Mountain Preserve and Del Mar Mesa Preserve (Preserves) NRMP, including establishing linkages to areas adjacent to the Preserves. Alignments within the revised trail system generally follow existing paths and access roads.

Public access easement vacations are required as part of the CPA and NRMP adoption. This involves vacating five (5) public access easements (Nos. 1, 3, and 4) recorded with Torrey Santa Fe Units 2-4 (Map Nos. 14274 and 14275) as shown on Figure 4. The areas covered by the CPA, NRMP and Easement Vacations are generally described as the southern portion of Carmel Valley; much of Del Mar Mesa; the southeastern portion of Pacific Highlands Ranch; the southwestern portion of Rancho Peñasquitos and the southern portion of Torrey Highlands. The trails within the Preserves provide recreational opportunities consistent with the policies of the General Plan and applicable community plans.

The NRMP has been prepared to provide guidelines for the protection and maintenance of preserved natural open space on the Preserves as well as to assure compliance with Area Specific Management Directives (ASMDs) which satisfy the requirements of the City's Multiple Species Conservation Program (MSCP) Subarea Plan Implementing Agreement for The Preserves. The City of San Diego MSCP provides a framework for preserving and protecting natural resources in the San Diego region. The City of San Diego prepared a Subarea Plan under the MSCP to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act of 1992. The Preserves NRMP describes the tasks that will ensure management and maintenance of the Preserves in accordance with the MSCP and the Subarea Plan. The natural open space of the Preserves harbors extremely sensitive and depleted vegetation communities and species unique to the San Diego region. The primary resources to be protected on these Preserves are vernal pools; southern maritime chaparral; the continuity of habitat for wildlife movement and gene flow and the federally and state listed flora and fauna (particularly the short-leaved dudleya, *Dudleya blochmaniae* ssp. *brevifolia*).

Adoption of the CPAs and the NRMP does not authorize construction prior to or without subsequent approval in accordance with the Land Development Code. Implementation of future projects identified in the NRMP may require submittal and review for issuance of a Site Development Permit (SDP) and/or Coastal Development Permit (CDP) prior to any construction-related activities, but are not being proposed at this time.

Applicant: City of San Diego, Park and Recreation Department - Open Space Division

Recommended Finding: The recommended finding that the project will not have a significant effect on the environment is based on an Initial Study and project revisions/conditions which now mitigate potentially significant environmental impacts in the following area(s): **LAND USE (MULTIPLE SPECIES CONSERVATION PROGRAM/MULTI-HABITAT PLANNING AREA), BIOLOGICAL RESOURCES, AND HISTORICAL RESOURCES (ARCHAEOLOGY).**

Availability in Alternative Format: To request this Notice, the draft Mitigated Negative Declaration, Initial Study, and/or supporting documents in alternative format, call the Development Services Department at 619-446-5460 or (800) 735-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact Myra Herrmann at (619) 446-5372. The draft Mitigated Negative Declaration and supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Center. If you are interested in obtaining a hard-copy of the draft Mitigated Negative Declaration, or the separately bound technical appendices, they can be purchased for an additional cost. For additional information regarding the public meetings/hearings on this project, contact Bernie Turgeon at (619) 533-6575. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and distributed on **March 20, 2014**

Cathy Winterrowd
Interim Deputy Director
Development Services Department



Advanced Planning & Engineering Division
(619) 446-5460

DRAFT MITIGATED NEGATIVE DECLARATION

Project No. N/A
SCH# Pending

SUBJECT: CARMEL MOUNTAIN/DEL MAR MESA TRAILS COMMUNITY PLAN AMENDMENTS, EASEMENT VACATIONS AND ADOPTION OF THE NATURAL RESOURCES MANAGEMENT PLAN. CITY COUNCIL APPROVAL to allow for the adoption of Amendments to the following land use plans: Del Mar Mesa, Carmel Valley (Neighborhood 8A), Pacific Highlands Ranch, Rancho Peñasquitos, and Torrey Highlands to revise the planned trail system in five northern communities; adoption of the Carmel Mountain and Del Mar Mesa Natural Resources Management Plan (NRMP) and Easement Vacations within the Preserves. The purpose of the Community Plan Amendments (CPA) is to incorporate a trail system that will be implemented in accordance with the Carmel Mountain Preserve and Del Mar Mesa Preserve (Preserves) NRMP, including establishing linkages to areas adjacent to the Preserves. The trails within the Preserves provide recreational opportunities consistent with the policies of the General Plan and applicable community plans. Alignments within the revised trail system generally follow existing paths and access roads. Public access easement vacations are required as part of the CPA and NRMP adoption. This involves vacating five (5) public access easements (Nos. 1, 3, and 4) recorded with Torrey Santa Fe Units 2-4 (Map Nos. 14274 and 14275) as shown on Figure 4. The areas covered by the CPA, NRMP and Easement Vacations are generally described as the southern portion of Carmel Valley; much of Del Mar Mesa; the southeastern portion of Pacific Highlands Ranch; the southwestern portion of Rancho Peñasquitos and the southern portion of Torrey Highlands.

The NRMP has been prepared to provide guidelines for the protection and maintenance of preserved natural open space on the Preserves as well as to assure compliance with Area Specific Management Directives (ASMDs) which satisfy the requirements of the City's Multiple Species Conservation Program (MSCP) Subarea Plan Implementing Agreement for The Preserves. The City of San Diego MSCP provides a framework for preserving and protecting natural resources in the San Diego region. The City of San Diego prepared a Subarea Plan under the MSCP to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act of 1992. The Preserves NRMP describes the tasks that will ensure management and maintenance of the Preserves in accordance with the MSCP and the Subarea Plan. The natural open space of the Preserves harbors extremely sensitive and depleted vegetation communities and species unique to the San Diego region. The primary resources to be protected on these Preserves are vernal pools; southern maritime chaparral; the continuity of habitat for wildlife movement and gene flow and the federally and state listed flora and fauna (particularly the short-leaved dudleya, *Dudleya blochmaniae* ssp. *brevifolia*).

Adoption of the CPAs and the NRMP does not authorize construction prior to or without subsequent approval in accordance with the Land Development Code. Implementation of future projects identified in the NRMP may require submittal and review for issuance of a Site Development Permit (SDP) and/or Coastal Development Permit (CDP) prior to any construction-related activities, but are not being proposed at this time.

Applicant: City of San Diego Park and Recreation Department.

- I. PROJECT DESCRIPTION: See attached Initial Study.
- II. ENVIRONMENTAL SETTING: See attached Initial Study.
- III. DETERMINATION:

The City of San Diego conducted an Initial Study which determined that the proposed project could have a significant environmental effect in the following areas(s): LAND USE (MULTIPLE SPECIES CONSERVATION PROGRAM/MULTI-HABITAT PLANNING AREA), BIOLOGICAL RESOURCES, AND HISTORICAL RESOURCES (ARCHAEOLOGY). The project proposal requires the implementation of specific mitigation identified in Section V of this Mitigated Negative Declaration (MND). The project as presented avoids or mitigates the potentially significant environmental effects identified, and the preparation of an Environmental Impact Report (EIR) would not be required.

- IV. DOCUMENTATION:

The attached Initial Study documents the reasons to support the above Determination.

- V. MITIGATION, MONITORING AND REPORTING PROGRAM:

LAND USE (MSCP/MHPA, ESL REGULATIONS & HISTORICAL RESOURCES REGULATIONS)

Mitigation Framework (Compliance with Applicable Regulations)

LU-1a: Future projects implemented in accordance with the CPA Trails Plan and NRMP shall be subject to environmental review at the project-level in accordance with the Mitigation Framework HIST-1 (Historical Archaeological Resources) and the Cultural Resources Management Guidelines of the NRMP.

LU-1b: Future projects implemented in accordance with the CPA Trails Plan and NRMP which have the potential to impact Environmentally Sensitive Lands such as sensitive vegetation, wetlands or vernal pools shall be subject to environmental review at the project-level in accordance with the Mitigation Framework BIO-1 through BIO-4 (Biological Resources) and further guided by the Biological Resources Area Specific Management Directives (ASMDs) of the NRMP.

LU-2:

Mitigation Framework - MHPA Land Use Adjacency Guidelines

Future projects implemented in accordance with the CPA Trails Plan and NRMP which are located within and/or adjacent to the MHPA shall be subject to environmental review at the project-level in

accordance with the Mitigation Framework and ASMDs of the NRMP as further detailed below. Projects shall incorporate features that demonstrate compliance with the MHPA Land Use Adjacency Guidelines to ensure avoidance or reduction of potential MHPA impacts.

LU-2: Future project implemented in accordance with the CPA Trails Plan and NRMP shall comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Mitigation measures include, but are not limited to: sufficient buffers and design features, barriers (rocks, boulders, signage, fencing, and appropriate vegetation) where necessary, lighting directed away from the MHPA, and berms or walls adjacent to commercial or industrial areas and any other use that may introduce construction noise or noise from future development that could impact or interfere with wildlife utilization of the MHPA. The project biologist for each proposed project would identify specific mitigation measures needed to reduce impacts to below a level of significance. Subsequent environmental review would be required to determine the significance of impacts and compliance with the Land Use Adjacency Guidelines of the MSCP. Prior to approval of any subsequent project within and/or adjacent to the MHPA, the City of San Diego shall identify specific conditions of approval in order to avoid or to reduce potential impacts to the MHPA.

Specific requirements shall include:

- Prior to the issuance of any permits, development areas shall be permanently fenced where development is adjacent to the MHPA to deter the intrusion of people and/or pets into the MHPA open space areas. Signage may be installed as an additional deterrent to human intrusion as required by the City.
- The use of structural and nonstructural best management practices (BMPs), including sediment catchment devices, shall be required to reduce the potential indirect impacts associated with construction to drainage and water quality. Drainage shall be directed away from the MHPA or, if not possible, must not drain directly into the MHPA. Instead, runoff shall flow into sedimentation basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA. Drainage shall be shown on the site plan and reviewed satisfactory to the City Engineer.
- All outdoor lighting adjacent to open space areas shall be shielded to prevent light over-spill off-site. Shielding shall consist of the installation of fixtures that physically direct light away from the outer edges of the road or landscaping, berms, or other barriers at the edge of development that prevent light over spill.
- The landscape plan for the project shall contain no exotic plant/invasive species and shall include an appropriate mix of native species which shall be used adjacent to the MHPA.
- All manufactured slopes must be included within the development footprint and outside the MHPA.
- All brush management areas shall be shown on the site plan and reviewed and approved by the Environmental Designee. Zone 1 brush management areas shall be included within the development footprint and outside the MHPA. Brush management Zone 2 may be permitted within the MHPA (considered impact neutral) but cannot be used as mitigation. Vegetation

clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area shall be the responsibility of a homeowners association or other private party.

- Access to the MHPA, if any, shall be directed to minimize impacts and shall be shown on the site plan and reviewed and approved by the Environmental Designee.

Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures shall include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement shall be incorporated into leases on publicly owned property as leases come up for renewal.

BIOLOGICAL RESOURCES

Mitigation Framework

Mitigation is required for impacts that are considered significant under the City of San Diego's Biology Guidelines (2012) and the City of San Diego's CEQA Significance Determination Thresholds (2011). All impacts to sensitive biological resources shall be avoided to the maximum extent feasible and minimized when avoidance is not possible. Future projects implemented in accordance with the CPA Trails Plan and NRMP shall be subject to environmental review in accordance with the Biological Resources Mitigation Framework and the ASMD's of the Biological Resources Management Guidelines in the NRMP. Where impacts are not avoidable or cannot be minimized, mitigation shall be required to reduce significant impacts to below a level of significance. Mitigation measures typically employed include resource avoidance, restoration, or creation of habitat, dedication, or acquisition of habitat or payment into the City of San Diego's Habitat Acquisition Fund or other City-approved mitigation bank and will be determined and implemented at the project-level. Adherence to the Mitigation Framework and the ASMDs in the NRMP are anticipated to minimize impacts to sensitive biological resources.

BIO-1: To reduce potentially significant impacts that would cause a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals, if present within the Preserves area, all subsequent projects implemented in accordance with the CPA and NRMP shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012). The locations of any sensitive plant species, including listed, rare, and narrow endemic species, as well as the potential for occurrence of any listed or rare wildlife species shall be recorded and presented in a biological resources report. Based on available habitat within Preserves, focused presence/absence surveys shall be conducted in accordance with the biology guidelines and applicable resource agency survey protocols to determine the potential for impacts resulting from the future projects on these species. Engineering design specifications based on project-level grading and site plans shall be incorporated into the design of future projects to minimize or eliminate direct impacts on sensitive plant and wildlife species consistent with the FESA, MBTA, Bald and Golden Eagle Protection Act, California Endangered Species Act (CESA), MSCP Subarea Plan, and ESL Regulations.

In addition to the requirements detailed above, specific measures shall be implemented when the biological survey results in the identification of Burrowing Owls on the project site. Future projects shall be required to conduct a habitat assessment to determine whether or not protocol surveys are needed. Should burrowing owl habitat or sign be encountered on or within 150 meters of the project site, breeding season surveys shall be conducted. If occupancy is determined, site-specific avoidance and mitigation measures shall be developed in accordance with the protocol established in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). Measures to avoid and minimize impacts to burrowing owl shall be included in a Conceptual Burrowing Owl Mitigation Plan which includes take avoidance (pre-construction) surveys, site surveillance, and the use of buffers, screens, or other measures to minimize construction-related impacts.

Mitigation for Impacts to Sensitive Upland Habitats

Future projects implemented in accordance with the CPA Trails Plan and NRMP resulting in impacts to sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the City Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with the City's Biology Guidelines (see Table 1A) MSCP Subarea Plan. Future project-level grading and site plans shall incorporate project design features to minimize direct impacts on sensitive vegetation communities including but not limited to riparian habitats, wetlands, oak woodlands, and coastal sage scrub consistent with federal, state, and City guidelines. Any required mitigation for impacts on sensitive vegetation communities shall be outlined in a conceptual mitigation plan following the outline provided in the City Biology Guidelines.

Mitigation for impacts to sensitive vegetation communities shall be implemented at the time future projects are proposed. Project-level analysis shall determine whether the impacts are within or outside of the MHPA. Mitigation for impacts to sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines (City of San Diego 2012a). These mitigation ratios are based on Tier level of the vegetation community, the location of the impact and the location of the mitigation site(s). For example, impacts to lands inside of the MHPA and mitigated outside the MHPA would have the highest mitigation ratio whereas impacts to lands outside the MHPA and mitigated inside the MHPA would have the lowest mitigation ratio.

Any MHPA boundary adjustments associated with future projects implemented in accordance with the CPA Trails Plan or NRMP shall be processed by the individual project applicants through the City and Wildlife Agencies during the early project planning stage.

**TABLE 1A
MITIGATION RATIOS FOR IMPACTS TO UPLAND VEGETATION COMMUNITIES
AND LAND COVER TYPES**

Tier	Habitat Type	Mitigation Ratios			
TIER 1 (rare uplands)	Southern Foredunes	Location of Preservation			
	Torrey Pines Forest			Inside	Outside
	Coastal Bluff Scrub	Location	Inside*	2:1	3:1
	Maritime Succulent Scrub	of Impact	Outside	1:1	2:1
	Maritime Chaparral				
	Scrub Oak Chaparral				
	Native Grassland				
	Oak Woodlands				
TIER II (uncommon uplands)	Coastal Sage Scrub	Location of Preservation			
	Coastal Sage Scrub/ Chaparral			Inside	Outside
		Location	Inside*	1:1	2:1
		of Impact	Outside	1:1	1.5:1
TIER III A (common uplands)	Mixed Chaparral	Location of Preservation			
	Chamise Chaparral			Inside	Outside
		Location	Inside*	2:1	3:1
		of Impact	Outside	1:1	2:1
TIER III B (common uplands)	Non-Native Grasslands	Location of Preservation			
				Inside	Outside
		Location of	Inside*	1:1	1.5:1
		Impact	Outside	0.5:1	1:1

Notes:

For all Tier I impacts, the mitigation could (1) occur within the MHPA portion of Tier I (in Tier) or (2) occur outside of the MHPA within the affected habitat type (in-kind).

For impacts on Tier II, IIIA, and IIIB habitats, the mitigation could (1) occur within the MHPA portion of Tiers I – III (out-of-kind) or (2) occur outside of the MHPA within the affected habitat type (in-kind). Project-specific mitigation will be subject to applicable mitigation ratios at the time of project submittal.

Mitigation for Short-term Impacts to Sensitive Species from Project Construction

Specific measures necessary for reducing potential construction-related noise impacts to the coastal California gnatcatcher, least Bell’s vireo, burrowing owl, and the California cactus wren are further detailed in LU-2 and BIO-2.

Mitigation for impacts to sensitive wildlife species (including temporary and permanent noise impacts) resulting from future projects implemented in accordance with the CPU are included in Sections 5.1.6.3 (Land Use) and 5.4.4.3 (Biological Resources). Please refer to Mitigation Framework BIO-1 through BIO-4 and LU-2 (MHPA Land Use Adjacency Guidelines).

Mitigation Framework - Migratory Wildlife

BIO-2: Mitigation for future projects to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species within the NRMP Preserves, shall be identified in site-specific biological resources surveys prepared in accordance with City of San Diego Biology Guidelines as further detailed in BIO-1 during the subsequent review process. The Biology Report shall include results of protocol surveys and recommendations for additional measures to be implemented

during construction-related activities; shall identify the limits of any identified local-scale wildlife corridors or habitat linkages and analyze potential impacts in relation to local fauna, and the effects of conversion of vegetation communities (e.g., non-native grassland to riparian or agricultural to developed land) to minimize direct impacts on sensitive wildlife species and to provide for continued wildlife movement through the corridor.

Measures that shall be incorporated into project-level construction documents to minimize direct impacts on wildlife movement, nesting or foraging activities shall be addressed in the Biology report and shall include recommendations for preconstruction protocol surveys to be conducted during established breeding seasons, construction noise monitoring and implementation of any species specific mitigation plans (such as a Burrowing Owl Mitigation Plan) in order to comply with the FESA, MBTA, Bald and Golden Eagle Protection Act, State Fish and Game Code, and/or the ESL Regulations.

Mitigation Framework for Impacts to Wetlands

Future project implemented in accordance with the CPA Trails Plan and NRMP which cannot result in impacts to wetlands/jurisdictional resources which cannot be avoided shall be required to implement the following Mitigation Framework and Biological Resources Management Guidelines contained in the NRMP:

BIO-4: To reduce potential direct impacts to City, state, and federally regulated wetlands, future projects implemented in accordance with the CPA Trails Plan and NRMP shall be required to comply with USACE Clean Water Act Section 404 requirements and special conditions, CDFW Section 1602 Streambed Alteration Agreement requirements and special conditions, and the City of San Diego ESL Regulations for minimizing impacts to wetlands. Achieving consistency with these regulations for impacts on wetlands and special aquatic sites would reduce potential impacts to regulated wetlands and provide compensatory mitigation (as required) to ensure no net-loss of wetland habitats.

Prior to obtaining approval for future actions implemented in accordance with the CPA Trails Plan and NRMP, a site-specific biological resources survey shall be completed in accordance with City of San Diego Biology Guidelines. Any required mitigation for impacts shall be outlined in a conceptual wetland mitigation plan prepared in accordance with the City's Biology Guidelines (2012a). In addition, a preliminary or final jurisdictional wetlands delineation of the project site shall be completed following the methods outlined in the USACE's 1987 *Wetlands Delineation Manual* and the *Regional Supplement to the Corps of Engineers Delineation Manual for the Arid West Region*. A determination of the presence/absence and boundaries of any Waters of the US and Waters of the State shall also be completed following the appropriate USACE guidance documents for determining the OHWM boundaries. The limits of any riparian habitats on-site under the sole jurisdiction of CDFW shall also be delineated, as well as any special aquatic sites (excluding vernal pools) that may not meet federal jurisdictional criteria but are regulated by California Coastal Commission and the RWQCB. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize direct impacts to wetlands, jurisdictional waters, riparian habitats, vernal pools, etc. consistent with federal, state, and City guidelines.

Additionally, any impacts to wetlands in the City of San Diego would require a deviation from the ESL wetland regulations. Under the wetland deviation process, development proposals that have wetland impacts shall be considered only pursuant to one of three options; Essential Public Projects, Economic Viability Option, or Biologically Superior Option. ESL Regulations require that impacts to wetland be

avoided. Unavoidable impacts to wetlands shall be minimized to the maximum extent practicable and mitigated as follows:

- As part of the project-specific environmental review pursuant to CEQA, all unavoidable wetland impacts shall be analyzed, and mitigation shall be required in accordance with ratios shown in Tables 5.4-8a and b below. Mitigation shall be based on the impacted type of wetland and project design. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland.
- For the Biologically Superior Option, the project and proposed mitigation shall include avoidance, minimization, and compensatory measures, which would result in a biologically superior net gain in overall function and values of (a) the type of wetland resource being impacted and/or (b) the biological resources to be conserved. The Biologically Superior Option mitigation shall include either (1) standard mitigation per Table 2A, including wetland creation or restoration of the same type of wetland resource that is being impacted that results in high quality wetlands; and a biologically superior project design whose avoided area(s) (i) is in a configuration or alignment that optimizes the potential long-term biological viability of the on-site sensitive biological resources, and/or (ii) conserves the rarest and highest quality on-site biological resources; or (2) for a project not considered consistent with “1” above, extraordinary mitigation per Table 2B is required.

**TABLE 2A
CITY OF SAN DIEGO WETLAND MITIGATION RATIOS
(With Biologically Superior Design)**

Vegetation Community	Mitigation Ratio
Riparian	2:1 to 3:1
Vernal pool*	2:1 to 4:1
Basin with fairy shrimp*	2:1 to 4:1
Freshwater marsh	2:1

*The City currently does not have take authority for vernal pools. A draft vernal pool HCP is currently being prepared by the City in coordination with the Wildlife Agencies. If adopted, the City would have “take” authority for the vernal pool species occurring within the vernal pool HCP areas.

**TABLE 2B
CITY OF SAN DIEGO WETLAND MITIGATION RATIOS
(Without Biologically Superior Design)**

Vegetation Community	Mitigation Ratio
Riparian	4:1 to 6:1
Vernal pool*	4:1 to 8:1
Basin with fairy shrimp*	4:1 to 8:1
Freshwater marsh	4:1

*The City currently does not have take authority for vernal pools. A draft vernal pool HCP is currently being prepared by the City in coordination with the Wildlife Agencies. If adopted, the City would have “take” authority for the vernal pool species occurring within the vernal pool HCP areas.

As part of any future project-specific environmental review pursuant to CEQA, all unavoidable wetlands impacts (both temporary and permanent) shall be analyzed and mitigation required in accordance with the City Biology Guidelines; mitigation shall be based on the impacted type of wetland habitat. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland. The following provides operational definitions of the four types of activities that constitute wetland mitigation under the ESL Regulations:

- **Wetland creation** is an activity that results in the formation of new wetlands in an upland area. An example is excavation of uplands adjacent to existing wetlands and the establishment of native wetland vegetation.
- **Wetland restoration** is an activity that re-establishes the habitat functions of a former wetland. An example is the excavation of agricultural fill from historic wetlands and the re-establishment of native wetland vegetation.
- **Wetland enhancement** is an activity that improves the self-sustaining habitat functions of an existing wetland. An example is removal of exotic species from existing riparian habitat.
- **Wetland acquisition** may be considered in combination with any of the three mitigation activities above.

Wetland enhancement and wetland acquisition focus on the preservation or the improvement of existing wetland habitat and function and do not result in an increase in wetland area; therefore, a net loss of wetland may result. As such, acquisition and/or enhancement of existing wetlands shall be considered as partial mitigation only for any balance of the remaining mitigation requirement after restoration or creation if wetland acreage is provided at a minimum of a 1:1 ratio.

For permanent wetland impacts that are unavoidable and minimized to the maximum extent feasible, mitigation shall consist of creation of new in-kind habitat to the fullest extent possible and at the appropriate ratios. If on-site mitigation is not feasible, then at least a portion of the mitigation must occur within the same watershed. The City's Biology Guidelines and MSCP Subarea Plan require that impacts on wetlands, including vernal pools, shall be avoided, and that a sufficient wetland buffer shall be maintained, as appropriate, to protect resource functions/values. The project specific biology report shall include an analysis of on-site wetlands (including City, state, and federal jurisdiction analysis) and, if present, include project alternatives that fully/substantially avoid wetland impacts. Detailed evidence supporting why there is no feasible less environmentally damaging location or alternative to avoid any impacts must be provided for City staff review, as well as a mitigation plan that specifically identifies how the project is to compensate for any unavoidable impacts. A conceptual wetland mitigation plan (which includes identification of the mitigation site) shall be approved by City staff prior to the release of the draft environmental document. Avoidance shall be the first requirement; mitigation shall only be used for impacts clearly demonstrated to be unavoidable.

Prior to the commencement of any construction-related activities within the Preserves for projects impacting wetland habitat (including earthwork and fencing) the applicant shall provide evidence of the following to the Assistant Deputy Director (ADD)/Environmental Designee prior to any construction activity:

- Compliance with USACE Section 404 nationwide permit;
- Compliance with the RWQCB Section 401 Water Quality Certification; and
- Compliance with the CDFW Section 1601/1603 Streambed Alteration Agreement.

Vernal Pools and Vernal Pool Species

Mitigation for projects impacting vernal pools shall include salvage of sensitive species from vernal pools to be impacted, introduction of salvaged material into restored vernal pool habitat where appropriate (e.g., same pool series) and maintenance of salvaged material pending successful restoration of the vernal pools. Salvaged material shall not be introduced to existing vernal pools containing the same species outside the vernal pool series absent consultation with and endorsement by vernal pool species experts not associated with the project (e.g., independent expert). The mitigation sites shall include preservation of the entire watershed and a buffer based on functions and values; however, if such an analysis is not conducted, there shall be a default of a 100-foot buffer from the watershed.

HISTORICAL RESOURCES

Mitigation Framework for Historical Resources (Archaeology)

Future projects implemented in accordance with the CPA Trails Plan and NRMP which result in, or have the potential to impact Historical Resources (Archaeology) shall be subject to review in accordance with the Mitigation Framework detailed below and compliance with the Cultural Resources Management Guidelines of the NRMP.

HIST-1: Future projects implemented in accordance with the CPA Trails Plan and NRMP that could directly affect an archaeological resource, shall be subject to environmental review at the project-level in accordance with the Mitigation Framework to determine: (1) the presence of archaeological resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, residential and commercial properties, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socio-economic and ethnic backgrounds. Sites may also include resources associated with pre-historic Native American activities.

INITIAL DETERMINATION

The environmental analyst will determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g. Archaeological Sensitivity Maps, the Archaeological Map Book, and the City’s “Historical Inventory of Important Architects, Structures, and People in San Diego”) and conducting a site visit. If there is any evidence that the site contains archaeological resources, then a historic evaluation consistent with the City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City Guidelines.

STEP 1:

Based on the results of the Initial Determination, if there is evidence that the site contains historical resources, preparation of a historic evaluation is required. The evaluation report would generally include background research, field survey, archaeological testing and analysis. Before actual field reconnaissance would occur, background research is required which includes a record search at the

SCIC at San Diego State University and the San Diego Museum of Man. A review of the Sacred Lands File maintained by the NAHC must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeological Center and any tribal repositories or museums.

In addition to the record searches mentioned above, background information may include, but is not limited to: examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous archaeological research in similar areas, models that predict site distribution, and archaeological, architectural, and historical site inventory files; and conducting informant interviews. The results of the background information would be included in the evaluation report.

Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet the standards outlined in the City Guidelines. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including, but not limited to, remote sensing, ground penetrating radar, and other soil resistivity techniques as determined on a case-by-case basis. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or traditional cultural properties. If through background research and field surveys historical resources are identified, then an evaluation of significance must be performed by a qualified archaeologist.

STEP 2:

Once a historical resource has been identified, a significance determination must be made. It should be noted that tribal representatives and/or Native American monitors will be involved in making recommendations regarding the significance of prehistoric archaeological sites during this phase of the process. The testing program may require reevaluation of the proposed project in consultation with the Native American representative which could result in a combination of project redesign to avoid and/or preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). An archaeological testing program will be required which includes evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City Guidelines.

The results from the testing program will be evaluated against the Significance Thresholds found in the Guidelines. If significant historical resources are identified within the Area of Potential Effect, the site may be eligible for local designation. At this time, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found, and site conditions are such that there is no potential for further discoveries, then no further action is required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation (DPR) site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required.

STEP 3:

Preferred mitigation for historical resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA, Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to draft CEQA document distribution. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities, whenever a Native American Traditional Cultural Property or any archaeological site located on City property or within the Area of Potential Effect of a City project would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of Public Resources Code Section 5097 must be followed. These provisions are outlined in the Mitigation Monitoring and Reporting Program (MMRP) included in the environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.

STEP 4:

Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation.

Specific types of historical resource reports are required to document the methods (see Section III of the Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g. collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required.

Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Guidelines), which will be used by Environmental Analysis Section staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources reports for archaeological sites and traditional cultural properties containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections

Management Plan shall be prepared for projects which result in a substantial collection of artifacts and must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries.

STEP 5:

For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information, and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state and federal standards. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project MMRP. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 and California Native American Graves Protection and Repatriation Act of 2001) and federal (i.e., Native American Graves Protection and Repatriation Act) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Arrangements for long-term curation must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, 36 Code of Federal Regulations 79 of the Federal Register. Additional information regarding curation is provided in Section II of the Guidelines.

VI. PUBLIC REVIEW DISTRIBUTION:

Draft copies or notice of this Mitigated Negative Declaration were distributed to:

United States Government

- U.S. Fish and Wildlife Service (23)
- U.S. Army Corps of Engineers (26)
- U.S. Environmental Protection Agency (19)

State of California

- California Department of Fish and Game (32A)
- Cal EPA (37A)
- Natural Resources Agency (43)
- Regional Water Quality Control Board, Region 9 (44)
- State Clearinghouse (46A)
- Coastal Commission (48)
- Water Resources Control Board (55)
- Native American Heritage Commission (56)

City of San Diego

Mayor's Office (91)

Council Member Lightner, District 1 (MS 10A)

City Attorney

Shannon Thomas (MS 93C)

Development Services Department/Planning

Bernie Turgeon

Myra Herrmann

Jeanne Krosch

Michael Prinz

Mehdi Rastakhiz

Leonard Wilson

Megan Sheffield

Park & Recreation Department

Chris Zirkle

Betsy Miller

Laura Ball

Environmental Services Department

Lisa Wood

Public Utilities Department

Keli Balo

Nicole McGinnis

Library Dept.-Gov. Documents MS 17 (81)

Carmel Valley Branch (81F)

Rancho Penasquitos Branch (81BB)

Real Estate Assets Department (85)

Fire & Life Safety (MS 603)

Michele Abella-Shon

Police Department

Sgt. Bill Carter, Operational Support Division

County of San Diego

Department of Planning & Land Use (68)

Parks Department (69)

Public Works (72)

Water Authority (73)

Land & Water Quality Division (76)

Other Groups and Individuals

SANDAG

San Diego Gas & Electric (114)

Sierra Club (165)

San Diego Canyonlands (165A)

San Diego Audubon Society (167)

Jim Peugh (167A)

California Native Plant Society (170)

San Diego Bay & Coastkeeper (173)

Ellen Bauder (175)

Citizens Coordinate for Century 3 (179)

Endangered Habitat League (182 and 182A)

Vernal Pool Society (185)
 Torrey Pines Association (186)
 San Diego Tracking Team (187)
 San Diego Natural History Museum (166)
 Carmen Lucas (206)
 Clint Linton (215B)
 South Coastal Information Center (210)
 San Diego Historical Society (211)
 San Diego Archaeological Center (212)
 Save Our Heritage Organization (214)
 Ron Christman (215)
 Louie Guassac (215A)
 Frank Brown - Inter-Tribal Cultural Resource Council (216)
 Campo Band of Mission Indians (217)
 San Diego County Archaeological Society (218)
 Kumeyaay Cultural Heritage Preservation (223)
 Kumeyaay Cultural Repatriation Committee (225)
 Native American Distribution (NOTICE ONLY 225A-S)
 Barona Group of Capitan Grande Band of Mission Indians (225A)
 Campo Band of Mission Indians (225B)
 Ewiiapaayp Band of Mission Indians (225C)
 Inaja Band of Mission Indians (225D)
 Jamul Indian Village (225E)
 La Posta Band of Mission Indians (225F)
 Manzanita Band of Mission Indians (225G)
 Sycuan Band of Mission Indians (225H)
 Viejas Group of Capitan Grande Band of Mission Indians (225I)
 Mesa Grande Band of Mission Indians (225J)
 San Pasqual Band of Mission Indians (225K)
 Ipai Nation of Santa Ysabel (225L)
 La Jolla Band of Mission Indians (225M)
 Pala Band of Mission Indians (225N)
 Pauma Band of Mission Indians (225O)
 Pechanga Band of Mission Indians (225P)
 Rincon Band of Luiseno Indians (225Q)
 San Luis Rey Band of Luiseno Indians (225R)
 Los Coyotes Band of Mission Indians (225S)
 Carmel Valley Community Planning Board (350)
 Diana Gordon (355)
 Los Penasquitos Canyon Preserve CAC (360)
 Del Mar Mesa Community Planning Board (361)
 Pacific Highlands Ranch –Subarea III (377A)
 Torrey Pines Associates (379)
 Rancho de los Penasquitos Planning Board (380)
 Gary Akin – SDG&E (381)
 Friend of Los Penasquitos Preserve (382)
 Rancho Penasquitos Town Council (383)
 Los Penasquitos Lagoon Foundation (384)
 Los Penasquitos Canyon Preserve CAC (385)

Debbie Knight (386)
Torrey Highlands – Subarea IV (467)
Torrey Hills Community Planning Board
Livia Borak - Coast Law Group, LLC
Douglas Johnson
Ben Stone
Frank Landis
Kevin Loomis
Mike Moore

VII. RESULTS OF PUBLIC REVIEW:

- () No comments were received during the public input period.
- () Comments were received but did not address the draft Mitigated Negative Declaration finding or the accuracy/completeness of the Initial Study. No response is necessary. The letters are attached.
- () Comments addressing the findings of the draft Mitigated Negative Declaration and/or accuracy or completeness of the Initial Study were received during the public input period. The letters and responses follow.

Copies of the draft Mitigated Negative Declaration, the Mitigation, Monitoring and Reporting Program and any Initial Study material are available in the office of the Entitlements Division for review, or for purchase at the cost of reproduction.



Myra Hermann, Senior Planner
Development Services Department

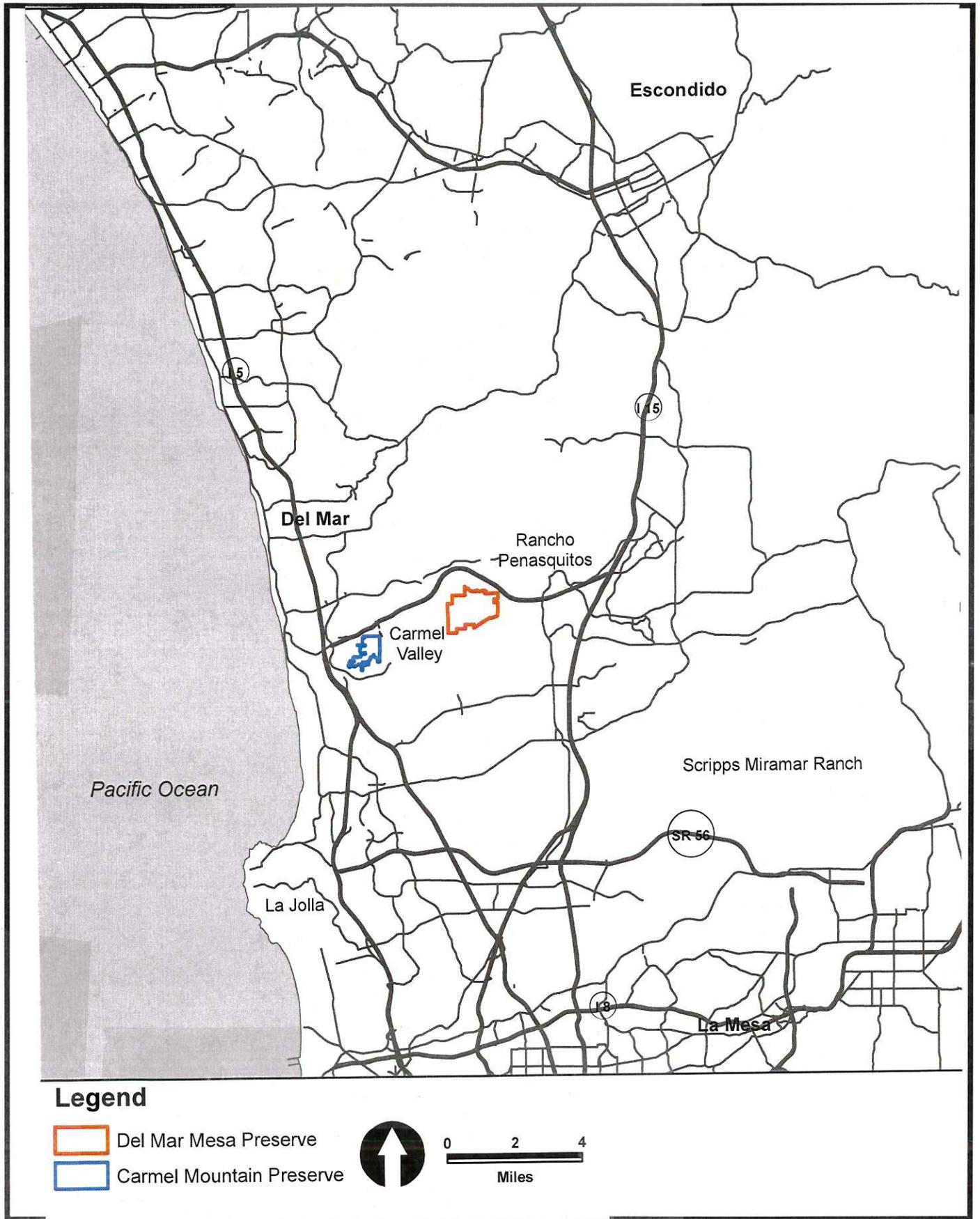
March 20, 2014
Date of Draft Report

Analyst: Herrmann

Date of Final Report

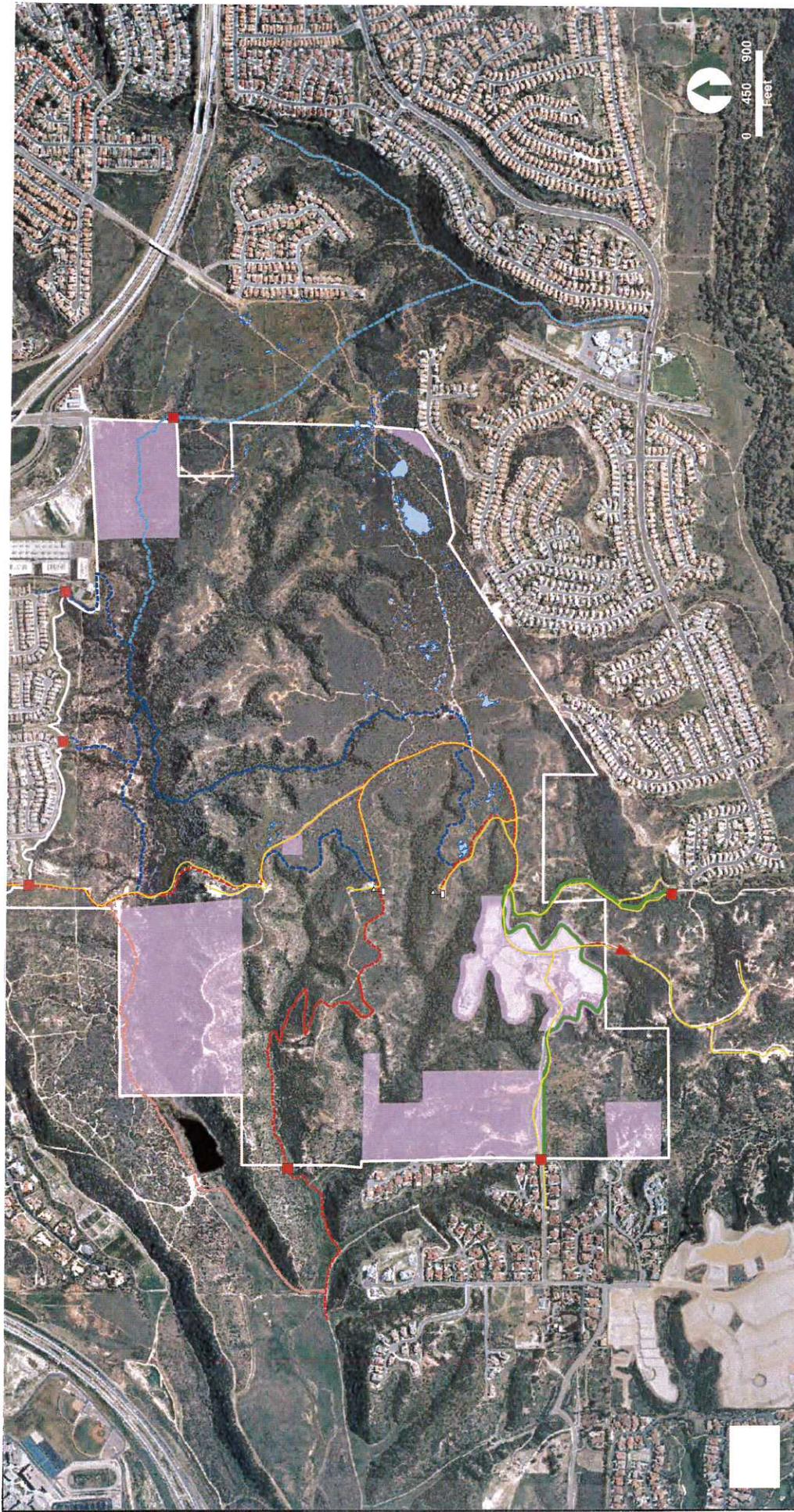
Attachments:

Figure 1 - Regional Location Map of Preserves
Figure 2 - Trail System on Del Mar Mesa Preserve
Figure 3 - Trail System on Carmel Mountain Preserve
Figure 3a - Trail System of Carmel Mountain Preserve
Figure 4 – Public Access Easement Vacations
Initial Study Checklist



REGIONAL LOCATION MAP OF PRESERVES
Carmel Mountain/Del Mar Mesa Trails & NRMP
 City of San Diego – Development Services Department

FIGURE
No. 1



- Proposed trail access
- SDC&E access roads
- Private property
- Proposed view point
- Proposed multi-use trail
- Proposed hikeable trail
- Proposed future multi-use trail
- Proposed future hikeable trail
- Existing trail per Del Mar Mesa Specific Plan
- Vernal pools (Source: City of San Diego Vernal Pool Inventory 2004)

Notes:
 1 - Fencing and signage will be installed as necessary.
 2 - Public trails will not be located on private land (pending land acquisition, MOU and/or trail easement).
 3 - Lands not shown as private, within the boundaries of Del Mar Mesa Preserve, are in public ownership or under easement to a public agency.

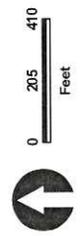


Trail System on Del Mar Mesa Preserve
Carmel Mountain/Del Mar Mesa Trails & NRMP
 City of San Diego – Development Services Department

FIGURE
No. 2



- Proposed Multi-Use Trails
- Proposed Hike and Bike Trails
- Proposed Hiking and Equestrian Trails
- Proposed Hiking Only Trails
- Proposed Equestrian Only Trails
- Proposed Future Multi-Use Trails
- Proposed Trail Access
- Proposed Hiking Signage
- Proposed Biking Signage
- Proposed Signage
- Utility/Access Road
- Proposed Fencing
- Vernal Pools (Source: City of San Diego, revised in part by RECON, 2001/2002)
- Sleeps (Source: City of San Diego, Heka Environmental Inc. revised in part by RECON, 2002)
- Private Property
- Proposed Viewpoint



Note: Public trails will not be located on private land (pending land acquisition, MOU and/or trail easement)

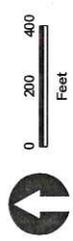
Trail System on Carmel Mountain Preserve (Map 1)
Carmel Mountain/Del Mar Mesa Trails & NRMP
 City of San Diego – Development Services Department



FIGURE
No. 3



- Proposed Multi-Use Trails
- Proposed Hike and Bike Trails
- Proposed Hiking and Equestrian Trails
- Proposed Hiking Only Trails
- Proposed Equestrian Only Trails
- Proposed Future Multi-Use Trails
- Proposed Trail Access
- Proposed Hiking Signage
- Proposed Biking Signage
- Proposed Sprague
- Utility Access Road
- Proposed Fencing
- Vernal Pools (Source: City of San Diego Vernal Pool Inventory 2004)
- Seeps (Source: City of San Diego, Heik Environmental Inc. revised in part by RECON 2002)
- Private Property
- Proposed Viewpoint



Note: Public trails will not be located on private land (pending land acquisition, MOU and/or trail easement)

Trail System on Carmel Mountain Preserve (Map 2)
 Carmel Mountain/Del Mar Mesa Trails & NRMP
 City of San Diego – Development Services Department



FIGURE
No. 3a

Existing access easements recorded with
Torrey Santa Fe Units 2 & 3 (Map No. 14274, 14275)



Public Access Easement Vacations (Del Mar Mesa Preserve)
Carmel Mountain/Del Mar Mesa Trails & NRMP
City of San Diego – Development Services Department

FIGURE
No. 4

Initial Study Checklist

1. Project title/Project number: **CARMEL MOUNTAIN/DEL MAR MESA TRAILS COMMUNITY PLAN AMENDMENTS, EASEMENT VACATIONS AND ADOPTION OF THE NATURAL RESOURCES MANAGEMENT PLAN. (SCH NO. PENDING)**
2. Lead agency name and address:
CITY OF SAN DIEGO
DEVELOPMENT SERVICES DEPARTMENT
1222 FIRST AVENUE, MS 501
SAN DIEGO, CA 92101
3. Contact person and phone number: Myra Herrmann, (619) 445-5372
4. Project location: The southern portion of Carmel Valley; much of Del Mar Mesa; the southeastern portion of Pacific Highlands Ranch; the southwestern portion of Rancho Peñasquitos and the southern portion of Torrey Highlands and is within the City of San Diego's Multi-Habitat Planning Area (Figures 1 and 2).
5. Project applicant/sponsor's name and address:
CITY OF SAN DIEGO
PARK AND RECREATION DEPARTMENT – OPEN SPACE DIVISION
ATTN: BETSY MILLER
202 C STREET, MS 5D
SAN DIEGO, CA 92101
6. General plan designation: OPEN SPACE
7. Zoning: OPEN SPACE (OR-1-2/OC-1-1, CVPD-OS) & AGRICULTURAL (A-1-10)
8. Description of project:
CITY COUNCIL APPROVAL to allow for the adoption of Amendments to the following land use plans: Del Mar Mesa, Carmel Valley (Neighborhood 8A), Pacific Highlands Ranch, Rancho Peñasquitos, and Torrey Highlands to revise the planned trail system in five northern communities; adoption of the Carmel Mountain and Del Mar Mesa Natural Resources Management Plan (NRMP) and Easement Vacations within the Preserves. The purpose of the Community Plan Amendments (CPA) is to incorporate a trail system that will be implemented in accordance with the Carmel Mountain Preserve and Del Mar Mesa Preserve (Preserves) NRMP, including establishing linkages to areas adjacent to the Preserves. The trails within the Preserves provide recreational opportunities consistent with the policies of the General Plan and applicable community plans. Alignments within the revised trail system generally follow existing paths and access roads.

Public access easement vacations are required as part of the CPA and NRMP adoption. This involves vacating five (5) public access easements (Nos. 1, 3, and 4) recorded with Torrey Santa Fe Units 2-4 (Map Nos. 14274 and 14275) as shown on Figure 4. The conserved, City of San Diego-owned parcels immediately to the south of the Torrey Santa Fe development were added to the area within the Natural Resource Management Plan. Therefore, City staff reviewed existing public access easements for this area to ensure trail connections between public access points and the Del Mar Mesa Preserve. Field inspection by City staff revealed that four of these are in use, and one has been fenced and planted over, presumably by the HOA.

Based on the existing use patterns, the City proposed to include the four, currently used public access easements in the trails plan. However, input was requested from the Home Owner's Association at Torrey Santa Fe prior to finalizing the northern area trail plan. The HOA was notified of the NRMP process and presented with alternatives on October, 29, 2010, resulting in a vote against allowing public access across easements 1, 3, and 4. Easements voted for closure are not included in the trail plan and will be vacated through the Plan adoption process.

The NRMP has been prepared to provide guidelines for the protection and maintenance of preserved natural open space on the Preserves as well as assuring compliance with Area Specific Management Directives (ASMDs) which satisfy the requirements of the City's Multiple Species Conservation Program (MSCP) Subarea Plan Implementing Agreement for The Preserves. The City of San Diego MSCP provides a framework for preserving and protecting natural resources in the San Diego region. The City of San Diego prepared a Subarea Plan under the MSCP to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act of 1992. The Preserves NRMP describes the tasks that will ensure management and maintenance of the Preserves in accordance with the MSCP and the Subarea Plan. The natural open space of the Preserves harbors extremely sensitive and depleted vegetation communities and species unique to the San Diego region. The primary resources to be protected on these Preserves are vernal pools; southern maritime chaparral; the continuity of habitat for wildlife movement and gene flow and the federally and state listed flora and fauna (particularly the short-leaved dudleya, *Dudleya blochmaniae ssp. brevifolia*).

Adoption of the CPAs and the NRMP does not authorize construction prior to or without subsequent approval in accordance with the Land Development Code. Implementation of future projects identified in the NRMP may require submittal and review for issuance of a Site Development Permit (SDP) and/or Coastal Development Permit (CDP) prior to any construction-related activities, but are not being proposed at this time.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:
The areas covered by the CPA, NRMP and Easement Vacations are generally described as the southern portion of Carmel Valley; much of Del Mar Mesa; the southeastern portion of Pacific Highlands Ranch; the southwestern portion of Rancho Peñasquitos and the southern portion of Torrey Highlands (Figures 1 & 2). These areas are primarily within City-owned open space with surrounding residential land uses, Interstate 5 to the west, Interstate 56 to the north and northeast and Los Peñasquitos Canyon Preserve to the south.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.) No other approvals are anticipated to be required at this time.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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I) AESTHETICS – Would the project:

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

The Project is located within two MHPA Open Space Preserves. Topography within the Carmel Mountain Preserve can be generally described as level coastal terraces that tilt slightly westward. The central portion of the Preserve is a fairly level mesa varying from 380 to 430 feet AMSL with several small drainages dissecting the margins of the mesas. The Del Mar Mesa Preserve is more diverse with level mesa tops, steep slopes, major drainages, and undulating mima mounds and intervening depressions (vernal Pools). Elevations in this Preserve range from 420 feet AMSL on the mesa to 200 feet AMSL in the bottom of Deer Canyon which runs along the northern edge of the Preserve.

Overall, the character of the Preserves would not change with adoption of the CPA Trails Plan, NRMP or Easement Vacations. The existing uses within the Preserves would generally be unchanged although implementation would result in future trails closures and/or revegetation/restoration of degraded/damaged areas to protect and preserve sensitive biological and cultural resources. Scenic qualities within the Preserves would not be affected and users would still have unobstructed views throughout the area. Therefore, the project would not cause a significant impact to a scenic vista.

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

There are no designated scenic highways in the project vicinity. The closest eligible State Scenic Highway, I-5, is located west of the Preserve areas. Thus, the project would not impact a state scenic highway. The Project is within the MHPA and there are no designated trees or historic buildings within the Preserves which would be considered scenic resources. No rock outcroppings would be disturbed with implementation of the Project.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Adoption of the CPA Trails Plan and NRMP will allow the City's Park & Recreation Department to implement management guidelines and directives for maintenance of the Preserve while protecting natural and cultural resources without degrading the visual

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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character of the area. The revised trails plan for the Preserves would allow current and future users continued access for recreational opportunities. No significant change in landform or grading would occur. The Project would not reduce the diversity of elements associated with the Preserves and implementation of future projects would not result in an aesthetic that is significantly different from the existing aesthetic within the Preserves.

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Lighting within or adjacent to the MHPA must meet specific standards using the lowest illumination allowed for human safety, selectively placed, shielded, and directed away from preserved habitat in accordance with the MSCP Subarea Plan, Land Use Adjacency Guidelines. However, this project does not include any elements or other facilities that would require lighting. Therefore, the Project would not result in significant light or glare impacts.

II) AGRICULTURAL AND FOREST RESOURCES: In determining whether impacts to 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 to 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

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the project:

- a) Converts 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?

Both Preserve areas are located within City-owned Open Space with both open-space and agricultural zoning. However, neither area is classified as Prime, Unique, or Statewide Important Farmlands, nor would the Project convert farmlands to a non-agricultural use. Thus, no impact to important farmlands would occur with adoption of the CPA Trails Plan, NRMP or Easement Vacations.

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

The Preserve areas are zoned Agricultural (A-1-10) and Open Space (OR-1-2, OC-1-1 and CVPD-OS). Although agricultural uses are allowed in certain areas by right, the project sites are not under a Williamson Act contract and are not currently utilized for agricultural purposes, nor are there any future plans for agricultural uses within either Preserve. No impact would occur.

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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No forest land, timberland, or timberland zoned Timberland Production areas are located within or adjacent to the project sites, nor would the Project propose any changes to the zoning of the site to such uses. Thus, implementation of the Project would not impact land zoned for forest land.

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

No forest land would be lost, nor would forest land be converted to non-forest use with implementation of the Project.

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

As discussed in response II(b) above, the Project areas are within City-owned Open Space and not currently used for or planned for agricultural purposes, nor are there any current or planned agricultural or forest uses within the Preserves. Only minimal changes to the environment would result when future projects are implemented in accordance with the Project. These minimal changes would not conflict with any existing agricultural or forest land or result in the conversion of agricultural or forest land to other uses. Thus, no impact would occur.

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

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

Federal and state laws regulate the criteria air pollutants emitted into the ambient air by stationary and mobile sources. Criteria pollutants are defined by state and federal law as a risk to the health and welfare of the general public. The United States Environmental

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Protection Agency (USEPA) is responsible for enforcing the Federal Clean Air Act (CAA) of 1970 and its 1977 and 1990 Amendments. The CAA required the USEPA to establish National Ambient Air Quality Standards (NAAQS), which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. The NAAQS regulate six criteria pollutants: carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), ozone (O₃), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and lead (Pb). The California Air Resources Board (CARB) has established the more stringent California Ambient Air Quality Standards (CAAQS) for the six criteria pollutants through the California CAA of 1988, and also has established CAAQS for additional pollutants, including sulfates, hydrogen sulfide, vinyl chloride and visibility-reducing particles. Areas that do not meet the NAAQS or the CAAQS for a particular pollutant are considered to be "nonattainment areas" for that pollutant.

The CARB is the state regulatory agency with authority to enforce regulations to achieve and maintain the NAAQS and CAAQS. The CARB is responsible for the development, adoption, and enforcement of the state's motor vehicle emissions program, as well as the adoption of the CAAQS. In San Diego, the Air Pollution Control District (SDAPCD) is responsible for attainment planning required by the California CAA. The SDAPCD develops the Regional Air Quality Strategy (RAQS) to address strategies within the San Diego Air Basin (SDAB) to attain and maintain air quality standards (June 30, 1992, as amended). The local RAQS, in combination with those from all other California nonattainment areas with serious (or worse) air quality problems, are used by CARB to develop the California State Implementation Plan (SIP). The SIP was adopted by the CARB in 1994 and approved by the USEPA in mid-1996. Since that date, the SDAB has achieved its attainment goals in a timely manner.

The Project involves adoption of the CPA Trails Plan, NRMP and public access easement vacations which will allow the City's Park & Recreation Department to implement management guidelines and directives for maintenance of the Preserves while protecting natural and cultural resources. Future projects implemented in accordance with the Project are not anticipated to generate pollutants into the local airshed. For the most part, activities associated with future trail closures involving revegetation/restoration efforts would only require the use of hand tools and /or limited use of small machinery (e.g. small bobcat). In those cases, standard dust control measures and Best Management Practices would be implemented. However, these types of projects do not have the scope which would conflict with applicable air quality plans for the area and therefore, no impact would result.

- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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On April 15, 2004, the SDAB was classified as a basic nonattainment area for the 8-hour NAAQS for O₃. The SDAB is an attainment area for the NAAQS for all other criteria pollutants. The SDAB currently falls under a national "maintenance plan" for CO, following a 1998 redesignation as a CO attainment area (SDAPCD 2008b). The SDAB is currently classified as a nonattainment area under the CAAQS for O₃ (serious nonattainment), PM₁₀, and PM_{2.5} (CARB 2008). As noted above in Section III.a, the types of projects that would be implemented once the CPA and NRMP are adopted do not have the scope which would violate any air quality standard and therefore, no impact would result.

- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?
- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The SCAQMD's approach for assessing cumulative impacts is based on forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and state CAAs. As discussed in response III(a), the project would not conflict with the RAQS or applicable portions of the SIP and would maintain the attainment goals of the SDAB for all criteria pollutants. In addition, as discussed in response III(b), any future project-related construction would be limited to small machinery and hand-tools, would be short-term in nature, and would not result in a cumulatively considerable net increase of O₃ precursors (ROG and NO_x), PM₁₀ or PM_{2.5} (refer to Table 1). Therefore, the Project would not result in cumulatively considerable contributions to criteria pollutants within the SDAB.

- d) Expose sensitive receptors to substantial pollutant concentrations?
- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Sensitive receptors include schools (preschool through 12th grade), hospitals, resident care facilities, day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. None of these types of uses occur adjacent to the Preserves nor would implementation of the Trails Plan or NRMP result in any substantial levels of pollutants. As discussed earlier, the Project does not propose any uses which are not already occurring within the City-owned open space Preserves. Furthermore, none of these ongoing activities generate pollutant concentrations

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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which would be adverse to sensitive receptors if they did occur near the Preserves. Lastly, health risks from pollutants generally require prolonged exposure of decades. Chronic exposure is defined in the California Air Pollution Control Officers Association (CAPCOA) Air Toxics "Hot Spots" Program Risk Assessment Guidelines as 24 hours per day, seven days per week, 365 days per year, for 70 years. Persons using the open space or surrounding areas would not experience this level of exposure. It is not anticipated that the recreational uses within the Preserves would result in the formation of CO hotspots. In the absence of any localized health risk posed by air pollutants in the project vicinity, it is determined that the Project would not result in a significant health risk.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Implementation of the CPA Trails Plan and NRMP, along with continued operation of existing trails, closure of trails and revegetation/restoration efforts would not have the potential to create objectionable odors that could affect a substantial number of people.

IV. BIOLOGICAL RESOURCES – Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Have substantial adverse effects, 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 Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

Numerous biological field surveys have been conducted during development of the Preserves trail system between June 2009 and January 2014. The results of the surveys are presented in the project biological technical report prepared for the Project by RECON Environmental Inc., and the City of San Diego Park & Recreation Department (RECON 2001, City of San Diego 2014). The field surveys included vegetation mapping and mapping of sensitive plant and animal species. Southern Maritime Chaparral, Southern Mixed Chaparral, and Chamise Chaparral are the dominant plant communities within the NRMP boundary (Figures 3 and 4 of the City Biology Assessment, 2014). Vernal pools, Southern Willow Scrub, Scrub Oak Chaparral, Coastal Sage Scrub, Non-native Grassland and Eucalyptus Woodland habitats are also found within the Park.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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No federally or state listed plant species were observed within the GDP project boundary; however, one Multiple Species Conservation Program (MSCP) Narrow Endemic species, aphanisma (Aphanisma blitoides) was identified during the field survey. The following nine other sensitive plant species were observed within the project boundary: Nuttall's scrub oak (Quercus dumosa), south coast saltscare (Atriplex pacifica), San Diego barrel cactus (Ferocactus viridescens), sea dahlia (Coreopsis maritima), cliff spurge (Euphorbia misera), red sand-verbena (Abronia maritima), San Diego sagewort (Artemisia palmeri), California box-thorn (Lycium californicum), and woolly seablite (Suaeda taxifolia).

The following sensitive species have been identified in the area where trail improvements are proposed: aphanisma, south coast saltscare, sea dahlia, cliff spurge, California box-thorn, and woolly seablite. In order to minimize impacts to these species, locations of these plants would be identified in the field and efforts made to design the trails in a way that minimizes potential impacts to these plants. Impacts to aphanisma would be significant due to its status as a narrow endemic. Impacts to the other species would not be considered significant given their low sensitivity. Furthermore, these species would be included in the native planting proposed as part of the GDP.

Animal species noted during surveys for the NRMP and the project-specific biology surveys demonstrate that the Park supports a functioning chaparral ecosystem as expected within an MSCP Core Biological Area. The Preserves support diverse wildlife species: Carmel Mountain surveys detected 11 mammal, 51 bird, 4 reptile, 1 amphibian, and 1 invertebrate species; while, Del Mar Mesa Preserve surveys detected 12 mammal, 62 bird, 7 reptile, 4 amphibian, and 14 invertebrate species. The diversity of animals observed and expected to occur are typical of relatively undisturbed native habitat in coastal San Diego County and include California ground squirrel, southern pocket gopher, woodrats, bush rabbits, coyote, gray fox, southern mule deer, red-tailed hawks, California quail, mourning doves, Anna's hummingbirds, California towhees, western fence lizard, San Diego horned lizard, red diamond rattlesnake and San Diego fairy shrimp.

The NRMP does not propose adverse impacts to biologically sensitive resources and has been created to maintain and improve the quality of conserved lands within the project area by providing Area Specific Management Directives (ASMDs) to guide management and monitoring actions in conformance with the MSCP. The NRMP contains general sections detailing the location, ownership, and mitigation status of parcels within the preserve; detailed survey information on existing environmental conditions necessary for management; information on existing land uses and management challenges relevant to natural resource management; and resource management, maintenance and recreation guidelines for implementation by Park staff. The NRMP also identifies and prioritizes enhancement (e.g. invasive weed removal), education, and research needs and includes an implementation

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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schedule with responsible parties.

The proposed trail system which is within the City's MHPA will close and restore of 13.29 miles of existing trails, including areas of vernal pools and riparian habitat, resulting in an overall net benefit to the Preserves. In addition, the proposed trail system has been approved by the U.S. Fish and Wildlife Service (USFWS) and by the California Department of Fish and Wildlife (CDFW). Although adoption of the CPA Trails Plan and NRMP will not result in impacts to biological resources, future projects implemented in accordance with the adopted NRMP have the potential to result in direct and/or indirect impacts to sensitive species and habitat. Therefore, a Mitigation Framework for Biological Resources, including the ASMDs contained within the NRMP have been incorporated into the Mitigation, Monitoring and Reporting Program (MMRP) detailed in Section V of the Mitigated Negative Declaration (MND). These measures are included to assure compliance for future activities within the Preserve for the protection and preservation of sensitive biological resources and to reduce potential impacts to below a level of significance.

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

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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As presented in the project biological technical reports the Preserves support a number of wetland and upland plant communities which are identified as important in local, state and federal planning efforts. These habitats within Del Mar Mesa include: vernal pools, southern maritime chaparral, southern mixed chaparral, southern willow scrub, scrub oak chaparral, chamise chaparral (including disturbed and sparse areas), Diegan coastal sage scrub (including disturbed and sparse areas), non-native grassland, eucalyptus woodland, and non-native vegetation; within Carmel Mountain include: Diegan coastal sage scrub, southern maritime chaparral, mesic meadow, seeps and Selaginella, and disturbed areas.

The proposed trail system which is within the City's MHPA will close and restore of 13.29 miles of existing trails, including areas of vernal pools and riparian habitat, resulting in an overall net benefit to the Preserves. In addition, the proposed trail system has been approved by the U.S. Fish and Wildlife Service (USFWS) and by the California Department of Fish and Wildlife (CDFW). As noted above, although impacts to sensitive vegetation communities are considered significant, implementation of the adopted CPA Trails Plan and NRMP would not result in significant impacts; however, a Mitigation Framework has been incorporated into the MND to assure that future projects implemented in accordance with the NRMP avoid, minimize and/or mitigate potential impacts to below a level of significance.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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All revegetation and restoration of closed trails as described in the CPA Trails Plan, NRMP and Biology Assessment (2014) will occur within the MHPA and will require submittal of individual plans for review in accordance with the City's Biology Guidelines, MSCP Subarea Plan and ASMD's contained in the NRMP and subject to monitoring requirements and success criteria. In addition, implementation of NRMP elements requires consultation and approval by the Wildlife Agencies. As such, impacts to biological resources would be reduced to below a level of significance following mitigation.

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Project would not directly impact any naturally occurring wetland habitat. Buffers would be provided from all wetland habitats as part of the trail restoration/revegetation efforts. With adherence to the NRMP Management Guidelines, Biology Guidelines and MSCP Subarea Plan requirements, impacts to wetlands, as defined by Section 404 of the Clean Water Act, would be reduced to below a level of significance.

- 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"/>
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Project implementation would not impact any wildlife corridors, would not block wildlife movement within the MHPA Preserves or fill any tributary canyons, nor would it block any part of the wildlife corridor to the Pacific Ocean.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The Project would be in compliance with the City's policy on public tree protection. No designated tree resources would be removed and no impact would occur. The Project would comply with all applicable polices and regulations which protect biological resources.

- | | | | | |
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| 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

The City's MSCP Subarea Plan has been prepared to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act of 1992. This Subarea Plan describes how the City's portion of the MSCP Preserve, the MHPA, would be implemented. The MSCP identifies a MHPA that is intended to link all core biological areas into a regional wildlife preserve. The City's MSCP Subarea Plan Land Use Adjacency Guidelines contain a number of guidelines designed to minimize the impact of adjacent development on resources within the MHPA. Because the Preserves are entirely within the MHPA, these guidelines are applicable to the Project. Per the guidelines, issues pertaining to habitat insularization, drainage and toxins, lighting, noise, barriers, invasive plant species, grading/land development and increased trash must not adversely affect the Preserve area.

The NRMP has been created to maintain and improve the quality of conserved lands within the project area by providing Area Specific Management Directives (ASMDs) to guide management and monitoring actions in conformance with the MSCP. The NRMP contains general sections detailing the location, ownership, and mitigation status of parcels within the preserve; detailed survey information on existing environmental conditions necessary for management; information on existing land uses and management challenges relevant to natural resource management; and resource management, maintenance and recreation guidelines for implementation by Park staff. The NRMP also identifies and prioritizes enhancement (e.g. invasive weed removal), education, and research needs and includes an implementation schedule with responsible parties.

The MMRP detailed in Section V of the MND includes a Mitigation Framework describing the MHPA Land Use Adjacency Guidelines which would be applicable to any activities within the Preserves. Implementation of these measures would reduce the indirect impacts to below a level of significance.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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V. CULTURAL RESOURCES –

Would the project:

- a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?

The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. CEQA requires that before approving discretionary projects, the Lead Agency must identify and examine the significant adverse environmental effects, which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (Sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (Sections 15064.5(b)(1)). Any historical resource listed in, or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is considered to be historically or culturally significant.

No historical “built environment” resources have been identified within the Preserves and none are expected to be encountered. Therefore, for the purpose of the built environment, the Project would have no impacts and no mitigation framework has been included in the MND.

Archaeological resources are further addressed below in Section V.b.

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

A Phase I inventory of the project site was conducted by RECON in 2001 and most recently by Affinis in 2013, which included a records search conducted at the South Coastal Information Center (SCIC) and the San Diego Museum of Man. Both investigations included an intensive pedestrian survey performed by an archaeologist and Native American Monitor to relocate previously recorded sites or identify new sites within the CPA Trails Plan. The records search for Del Mar Mesa documented 38 previously recorded prehistoric and historic archaeological sites within the Preserve boundaries; and 27 prehistoric and historic archaeological sites within the Carmel Mountain Preserve. It should be noted that

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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additional archaeological data was also obtained from prior investigations for the Carmel Valley Neighborhood 8A Specific Plan and Del Mar Mesa Subarea V projects. As such, sites that had already been previously determined to be not significant were not further evaluated for this effort.

Within the Carmel Mountain Preserve 14 of the 27 recorded sites and one homestead had been previously evaluated for importance under CEQA. Three of the 14 sites evaluated were considered important under CEQA and the 11 remaining sites were not significant. Four previously identified sites were not relocated during the 2001 surveys and could be the result of incorrect mapping during recording or incorrect identification of natural materials as prehistoric artifacts. The 2013 study by Affinis and Red Tail Monitoring and Research further investigated one site within City-ownership in the southern portion of the Carmel Mountain Preserve. Site CA-SDI-11696 was recorded in 1990 and described as an early period habitation site. Site integrity was noted as good, except for natural erosion. The current study noted a mano fragment and angular debris (debitage) during the field survey. Equestrian use of the trail causing severe erosion was also noted, but the most severe erosion is outside the actual archaeological site. According to the Affinis report, the portion of the site outside the trail does not appear to be suffering any adverse effects from trail use. The portion of the site in this Preserve area is just west of the trail, not crossed by the trail. The trail does cross the northern portion of the site, which is in private ownership. Because the portion of the trail within this Preserve area is actually east of the archaeological site, no artifacts were observed in the trail, and no surface collection was conducted. An aerial photograph of the area shows unauthorized trails that appear to be subject to some use. At least one of these trails crosses the portion of CA-SDI-11,696, but most of the site appears to be relatively undisturbed. Artifacts were observed in the portion of the site within the NRMP, outside the trail. As discussed above, the portion of CA-SDI-11,696 within this Preserve area is west of the trail and not subject to direct impacts. Therefore, the site was not evaluated to assess significance. However, the site appears to retain good integrity and research potential and it is a potentially significant resource. The trail crossing the portion of the site in private ownership north of this Preserve area and is an authorized trail. Continued use of this trail could damage the site, which appears to retain good integrity. In order to avoid such impacts, the archaeological consultant has recommended that split rail fence or other deterrents be placed at the points where this unauthorized trail intersects the main trail.

Within the Del Mar Mesa Preserve area, site CA-SDI-14,131 was recorded and described as "a flaking station or lithic raw material prospect (small quarry area)" in 1995. Artifacts noted included two cores and three quartzite and volcanic flakes concentrated in an area with a diameter of 10 m. The survey report noted, "The site is intact and has not been disturbed" (Schroth et al. 1996:4-46). During the March 2013 field check by Affinis and Red Tail Monitoring and Research, it was noted that the site was in fair condition. During the fieldwork for the testing program in July 2013 which was conducted in accordance with the City's Historical Resources Guidelines, a wooden stake and metal tag from the 1995 survey were found, marked with the site's temporary number and the date. The mapped site area

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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and its immediate surroundings were surveyed in tight transects, in order to identify any surface artifacts. The only artifacts observed were one core fragment and one piece of debitage. Another quartzite cobble was collected as a possible core, but upon further examination it was determined not to be cultural. Four test units were excavated within the mapped area of the site, each unit measuring 1 m by ½ m. Unit 1 was placed just south of the existing trail, in an area where the surface soils have been eroded, exposing the cobble conglomerate. The other three test units were placed on the north side of the trail. This portion of the site is in better condition, as it has not been subject to impacts from hiking and biking use. Existing sandstone and cobble conglomerate made excavation the units somewhat difficult and due to the lack of subsurface cultural material, each unit was terminated at a depth of 30 cm. As noted, two artifacts were collected from the surface of the site: a core fragment and a flake. Based on the testing results, the site's research potential has essentially been exhausted through the testing program, including documentation of the site and curation of the artifacts collected. CA-SDI-14,131 is not a significant resource under CEQA or the City's HRG; therefore, no mitigation measures are required.

Other than the recommendations for fencing along the trail near CA-SDI-11,696 to additional mitigation measures are required. However, for future projects within the Preserves, implemented in accordance with the CPA Trails Plan and NRMP, some excavation may be required and given the archaeological sensitivity of the area, impacts to currently unknown resources may occur. Therefore, implementation of the Mitigation Framework for Historical Resources detailed in Section V of the MND along with the recommendations contained in the Cultural Resources Management Guidelines of the NRMP would reduce potentially significant impacts to historical (archaeological) resources to below a level of significance. Any future mitigation would require participation by a qualified archaeologist and Native American monitor during any ground-disturbing activities within the Preserves.

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

The City of San Diego's CEQA Significance thresholds state that grading which exceeds 1,000 cubic yards with 10 feet of depth/cut (high sensitivity) or 2,000 cubic yards with 10 feet of depth/cut (moderate sensitivity) has the potential to adversely affect paleontological resources and monitoring would be required. Based on the scope of the CPA Trails Plan, NRMP and Easement Vacations, impacts to paleontological resources are not anticipated and therefore, no mitigation is required.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Disturb and human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

No human remains have been documented within the project area; however, should human remains be encountered during ground disturbance activities for any future projects implemented in accordance with the CPA Trails Plan and NRMP, all required provisions/protocols would be implemented for the treatment of human remains as detailed in the Mitigation Framework contained within Section V of the MND and in accordance with the California Public Resources Code and the California Health and Safety Code including consultation with the state designated Native American MLD. Adherence to these provisions will reduce potential impacts to below a level of significance.

VI. GEOLOGY AND SOILS – Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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There are no known active faults crossing the Preserves. The nearest known active fault is the Rose Canyon fault southwest of this area. The potential for ground surface rupture due to fault movement is considered low within the Preserves. The actions associated with adoption of the CPA Trails Plan and NRMP would result in less than significant impacts associated with the rupture of a known earthquake fault.

ii) Strong seismic ground shaking?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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See response VI(a.i) with regard to study area seismicity. The project site is subject to ground shaking due to the presence of several active faults in the region, and has historically experienced moderate to high levels of seismicity. The actions associated with adoption of the CPA Trails Plan and NRMP would result in less than significant impacts associated with strong seismic ground shaking to less than significant levels.

iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Liquefaction is the phenomenon in which loosely deposited, saturated granular soils behave as a fluid for a short period of time during strong earthquake-induced ground shaking. Based on the dense nature of underlying formational materials and lack of near surface groundwater table, the potential for liquefaction within the Preserves does not exist. Thus, significant liquefaction impacts are not anticipated to occur.

iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Torrey Sandstone, Scripps Formation and the Lindavista Formation have been identified within the Carmel Mountain Preserve. Of these three, the Torrey Sandstone and Scripps Formation are sedimentary rocks that may contain planes of weakness. Within the Del Mar Mesa Preserve, the geology is characterized by Poway Conglomerate built out over the ancient coastal plain 45-40 million years ago. Based on the scope of the Project, there does not appear to be a potential risk associated with landslides for future projects implemented in accordance with the CPA Trails Plan and NRMP. However, any future improvements within the Preserves would be designed to meet current standards and include measures to minimize the risk which would reduce potential landslide risks to below a level of significance.

b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The NRMP includes a detailed discussion of the soil types within each Preserve area with respect to suitability for supporting biologically sensitive habitats and species including vernal pools. Adoption of the Trails Plan and NRMP would not in and of itself result in a substantial soil erosion or loss of topsoil. It should be noted however, that certain areas within the Preserves, erosion is occurring due to continued use of unauthorized trails. Adoption of the CPA Trails Plan and implementation of the management guidelines detailed in the NRMP associated with trail closures, revegetation and restoration will alleviate these conditions. Additionally, the sandstone formations underlying the Preserve areas are subject to erosion as a result of the natural condition within an open space preserve. While these conditions could exist, based on the nature of underlying formational materials and lack of

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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near surface groundwater table, the potential for lateral spreading, subsidence, liquefaction, or collapse is minimal. Therefore, any future improvements within the Preserves would be designed to meet current standards and include measures to minimize the risk which would reduce impacts related to soil erosion to below a level of significance.

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| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See responses VI(a.iii) and VI(a.iv). The NRMP includes a detailed discussion of the geologic units and soil types within each Preserve area with respect to suitability for supporting biologically sensitive habitats and species including vernal pools. Adoption of the Trails Plan and NRMP would not in and of itself result in a geologic condition as noted. The sandstone formations underlying the Preserve areas are subject to erosion as a result of the natural condition within an open space preserve. While these conditions could exist, based on the nature of underlying formational materials and lack of near surface groundwater table, the potential for lateral spreading, subsidence, liquefaction, or collapse is minimal. Therefore, any future improvements within the Preserves would be designed to meet current standards and include measures to minimize the risk which would reduce potential risks to below a level of significance.

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| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Expansive and/or compressible soils may be present on the project site. The soil of the Lindavista Formation typically has low to moderate expansion, while the Scripps Formation typically have moderate to high expansion. Any future improvements within the Preserves would be designed to meet current standards and include measures to minimize the risk associated with expansive or compressible soils encountered during construction. These would be treated in accordance with standard engineering methods (e.g., lime treatment, moisture conditioning, or utilization of special foundations) to reduce impacts to less than significant levels. Implementation of these measures would reduce potentially significant impacts related to expansive or compressible soils to below a level of significance.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No septic tanks are proposed. Thus, no impact would occur.

VII. GREENHOUSE GAS EMISSIONS

– Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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In order to serve as a guide for determining when a project triggers the need for a greenhouse gas (GHG) significance determination, the City has established an interim screening threshold for GHG emission analysis. Based on guidance in the CAPCOA report "CEQA & Climate Change," dated January 2008, the City is using an annual generation rate of 900 metric tons of GHGs to determine when further GHG analysis is required. This emission level is based on the amount of vehicle trips, the typical energy and water use, and other factors associated with projects. Based on this guidance from California Environmental Quality Act (CEQA) Guidelines, the City, and CAPCOA, implementation of the proposed GDP would result in a significant, cumulative climate change impact if it would generate in excess of a screening criterion of 900 metric tons of GHG.

This project does not include any staging or parking areas and would not result in an increase in vehicular traffic as measured in average daily trips, energy consumption or water usage. It is anticipated that the Preserves trail system would continue to be used by the local population by foot, bicycle or on horseback (in designated areas). No substantial operational emissions would be generated. Trail closures would be done by hand; revegetation/restoration efforts could require the use of small machinery (e.g., bobcat), but would be limited in nature, and construction-related GHG emissions would be substantially below the screening criterion of 900 metric tons per year of CO₂ equivalent, and therefore, impacts would be less than significant.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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As the GHG emissions related to implementation of the Project would fall below the 900 metric tons screening criterion described in response VII(a), the project would not conflict with state and federal plans and policies intended to reduce GHG emissions.

VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

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

No storage, transport, use, or disposal of any hazardous materials is proposed as part of the Project. Thus, no impact related to the transport of hazardous materials would occur with adoption of the CPA Trails Plan and NRMP implementation.

- 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?

As discussed in the response to VIII(a), no health risk would result from implementation of the Project.

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

There are no schools located within one-quarter mile of the project site; therefore, no such hazards would result.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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public or the environment?

The Preserve areas are not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two mile of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is not located within an airport land use plan or within two miles of a public airport or public use airport, or private airstrip, but is located within approximately northwest of Marine Corps Air Station (MCAS) Miramar. The federal Department of Defense has established Accident Potential Zones (APZs) for the air station. The established APZs define the areas that would be more likely to be affected by aircraft accidents. The Preserves are not located within any APZs for MCAS Miramar. Therefore, the project would not increase aircraft safety hazards and no safety hazards associated with flight activity have been identified. Accordingly, the project would not result in a safety hazard for people residing or working in the project area.

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| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is not located within the vicinity of a private airport. Therefore, the project would not increase aircraft safety hazards and no safety hazards associated with flight activity have been identified. Accordingly, the project would not result in a safety hazard for people residing or working in the project area.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| g) 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"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Emergency access to the Preserves would not change with adoption of the CPA Trails Plan and NRMP. Access currently meets the standards recognized by the City of San Diego Fire – Rescue Department and the Police Department. Thus, no impacts to emergency response

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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plans would result from implementation of the Project.

- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Much of the land surrounding the Preserves has been developed into residential communities and commercial establishments. The interface between the wildlands of the Preserves and the urban development creates several management issues regarding fire, sensitive species and habitats, and conflicts between those who want to preserve San Diego’s wildlands and those who buy homes adjacent to the wildlands. The NRMP dedicates an entire chapter to Fire Management and includes plans, programs and policies to address fire effects on biological and cultural resources within the Preserves as well as Fire-Rescue Department roles and responsibilities. Nevertheless, open space within the Preserves contains vegetation that could be susceptible to wildland fires. Adoption of the NRMP will assure that implementation of future projects comply with all fire safety regulations and code requirements established by the City of San Diego Fire-Rescue Department as further detailed in the NRMP to ensure the potential for wildland fires is less than significant.

IX. HYDROLOGY AND WATER QUALITY - Would the project:

- a) Violate any water quality standards or waste discharge requirements?

Adoption of the CPA Trails Plan and NRMP would result in the closure of 13.29 miles of existing trails. This will require revegetation/restoration with native plants and would reduce erosion. The restoration efforts would therefore improve the existing condition within the Preserves by reducing sediment discharge into local water bodies. Standard best management practices (BMPs) would be implemented to reduce soil erosion and runoff. Potential water quality impacts would be avoided or reduced to less than significant levels through conformance with National Pollutant Discharge Elimination System (NPDES) Permit conditions, when applicable, to address erosion control measures that would be implemented to avoid erosion impacts to exposed soil associated with revegetation and/or restoration activities.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project does not involve any long-term use of groundwater, with no associated impacts related to groundwater supplies or aquifer drawdown. The project is not anticipated to cause or contribute to an exceedence of applicable groundwater receiving water quality objectives. As such, no impacts to long-term infiltration or groundwater recharge would occur.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The CPA Trails plan has been designed to augment and use existing drainage patterns and discharge locations within the Preserves. In addition, the Preserves do not contain any drainage infrastructure. The overall drainage patterns within both Preserves would not be altered with adoption or implementation of the CPA Trails Plan and NRMP. Thus, impacts to on-site drainage would be less than significant.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Please see IX(c). The Project would not substantially alter the existing drainage patterns within the Preserves and would not alter the course of a stream or river. As a result of the reduction in surface water and the lack of impacts to existing drainage, implementation of the Project would not result in flooding on-site or downstream.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

As discussed in response IX(d), implementation of the Project (trail closures, revegetation and restoration efforts) would result in a net reduction in surface runoff, especially in areas which have severe erosion. The project does not represent a substantial source of polluted runoff, and site design and source control BMPs in accordance with the City's Stormwater Standards would prevent the generation of potential pollutants and exposure of storm water to pollutants. Thus, the Project would not result in significant water pollutants.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

As discussed in responses IX(a), (c) and (e), no significant impacts to water quality would occur with implementation of the Project.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The Project involves adoption of a CPA Trails Plan, NRMP and Easement Vacations. No existing or planned housing within the Preserves boundaries is proposed.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| h) Place within a 100-year flood hazard area, structures that would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

As indicated in response IX(g), the Project involves adoption of a CPA Trails Plan, NRMP and Easement Vacations. No existing or planned housing within the Preserves boundaries is proposed and there are no risks related to flooding with approval of the Project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is not located within a dam inundation zone, and thus would not be subject to flooding due to a dam failure. The Project would not result in the exposure of people or structures to a significant risk or loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam

j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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While the presence of steep, unvegetated slopes could increase the potential for mudflows within the Preserves, the revegetation and restoration efforts would incorporate design measures to reduce the potential such conditions. Additionally, there is a low potential for significant tsunami effects within the Preserves based on the elevation above mean sea level (AMSL) and the distance from enclosed bodies of water. Therefore, there is no risk associated with inundation by seiche, tsunami, or mudflow.

X. LAND USE AND PLANNING –
Would the project:

a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The CPA Trails Plan and NRMP is designed to enhance the quality and character of the Preserve, and improve conservation efforts for natural resources. Although the Project will vacate three public access easement into the Del Mar Mesa Preserve, two easement will remain and continue to provide connectivity and linkage to the existing trail system. The Project would not introduce new uses or involve improvements which would physically divide an established community. Thus, Project would not physically divide an established community.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
adopted for the purpose of avoiding or mitigating an environmental effect?				

The CPA Trails Plan would add trail alignments and associated policy language to the Carmel Valley, Del Mar Mesa Pacific Highlands Ranch, Torrey Highlands and Rancho Penasquitos community plans to ensure consistency with the Carmel Mountain/ Del Mar Mesa NRMP. Both preserves are within MHPA Open Space and have regional significance with respect to habitat and species diversity. The NRMP would be consistent with the applicable goals and policies of the City's General Plan, Conservation Element which addresses design, construction, relocation and maintenance of trails. The Project would also help to implement the General Plan Recreation Element polices which address the need to balance passive recreation needs of trail use with environmental preservation. As such, no conflict would result.

The proposed project has complied with Senate Bill 18 requirements regarding Native American consultation by providing letters offering an opportunity to consult to 19 Native American individuals and organizations identified by the Native American Heritage Commission. No responses were received.

Adoption of the CPA Trails Plan and NRMP does not require deviation findings in accordance with the ESL Regulations, as no development is proposed at this time. However, as stated above, when future projects are submitted to implement any element of the NRMP, review in accordance with the ESL Regulations and approval of a Site Development Permit (SDP) would be required. Therefore, approval of the Project would not conflict with applicable land use plans.

Future projects implemented in accordance with the Trails Plan and NRMP will require review/approval of a Coastal Development Permit (CDP) in accordance with the City's Land Development Code as it applies in the Coastal Zone. Compliance with all provisions of the ESL Regulations for projects within the Coastal Zone and preparation of CDP findings will be required.

- c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

As discussed earlier, the NRMP has been developed to provide ASMDs that meet the requirements of the City's MSCP. In addition, as discussed in response IV(f), this Project and future projects implemented in accordance with the NRMP would be required to comply with the Land Use Adjacency Guidelines established to protect adjacent MHPA land from unauthorized activities.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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In addition to compatible use considerations, the project will conform to the City's MSCP Subarea Plan Framework Management Plan General Management Directives (Section 1.5.2) requirements for access, trails, and recreation, as follows (requirement in italics, explanation of project conformance in regular font):

1. Provide sufficient signage to clearly identify public access to the MHPA. Barriers such as vegetation, rocks/boulders or fencing may be necessary to protect highly sensitive areas. Use appropriate type of barrier based on location, setting and use.

Existing trailheads are marked with signage and informational/educational kiosks. Directional signage and barriers are provided throughout the trail system to guide users to their desired destination, and additional signage/barriers would be installed as needed based on trail monitoring results. The proposed trail system will remove trail segments adjacent to sensitive habitats and species (e.g. vernal pools, deer bedding areas) in favor of segments in less sensitive areas.

2. Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary due to the typically heightened resource sensitivity in those locations.

No new parking lots or view overlooks are proposed. The proposed trail system utilizes existing trail segments and utility access roads. The proposed trail segments do not follow the ecotone except for the shortest distance necessary to cross habitat types.

3. In general, avoid paving trails unless management and monitoring evidence shows otherwise. Clearly demarcate and monitor trails for degradation and off-trail access and use. Provide trail repair/maintenance as needed. Undertake measures to counter the effects of trail erosion including the use of stone or wood crossjoints, edge plantings of native grasses, and mulching of the trail.

The proposed trails permitted through this project would not be paved. All trails are surveyed by Park staff on a rotating basis throughout the year, with a complete trail maintenance survey occurring at the end of each rainy season. Actions to repair trail damage from erosion, inappropriate use, or other factors will be taken promptly as needed.

4. Minimize trail widths to reduce impacts to critical resources. For the most part, do not locate trails wider than four feet in core areas or wildlife corridors. Provide trail fences or other barriers at strategic locations when protection of sensitive resources is required.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The proposed trail segments would remain less than four feet in width except for access roads. If off-trail use is noted during trail maintenance surveys, areas of concern will be signed and/or barriers will be installed as necessary.

5. Limit the extent and location of equestrian trails to the less sensitive areas of the MHPA. Locate staging areas for equestrian uses at a sufficient distance (e.g., 300-500 feet) from areas with riparian and coastal sage scrub habitats to ensure that the biological values are not impaired.

No equestrian staging areas are proposed. Trails are collocated with existing utility access roads and existing paths.

6. Limit recreational uses to passive uses such as birdwatching, photography and trail use... Where permitted, restrain pets on leashes.

Only passive recreational activities will be allowed on the proposed trail system. Pursuant to the Municipal Code and the MSCP Framework Management Plan, pets would be required to be on leash at all times.

7. Design and maintain trails where possible to drain into a gravel bottom or vegetated (e.g., grasslined) swale or basin to detain runoff and remove pollutants.

Existing trails selected for retention in the trail system are sited at appropriate grades to minimize erosion and sedimentation.

The MSCP Subarea Plan Section 1.5.8, Specific Management Policies and Directives for the Northern Area, contains management directives for Del Mar Mesa (NCFUA Subarea 5) and Carmel Mountain (Carmel Valley Neighborhood 8A):

NCFUA Subarea 5

1. Clearly demarcate all trails through the Del Mar Mesa area and provide split rail fencing or barriers and signage along sensitive portions to discourage off-trail use. Trails through this area should use the existing disturbed roads as much as possible. No new trails should be cut through existing habitat. Assess existing dirt and disturbed roads and trails for restoration over the long-term.

Del Mar Mesa is patrolled regularly by City ranger staff. Upon approval of the NRMP, signs would be posted on Del Mar Mesa directing users to the approved trail system, and maps would be provided at entrance kiosks. The proposed trail system utilizes existing access roads with some additional segments of existing dirt paths. No new trails are proposed to be

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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cut through existing habitat. As part of the development of the proposed trail system, 13.29 miles of existing paths were identified for closure and restoration.

2. Develop an equestrian use plan for the Del Mar Mesa area that avoids the vernal pool habitat and their associated watershed areas. If possible, the Del Mar Mesa are should be managed as a single unit rather than split into separate entities according to ownership (County, various City departments, easements).

The NRMP and proposed trail plan fulfill this MSCP requirement for development of an equestrian use plan. The proposed trail system does not include direct impacts to vernal pool basins. The NRMP also discusses the alternatives for joint management in Section 1.2.2.

3. Protect sensitive areas of Del Mar Mesa area from impacts from adjacent development. Use signage to inform people of the sensitivity of the vernal pools and the Del Mar Mesa are in general, and restrict off-road vehicle use in the area.

Upon approval of the NRMP, additional educational signage will be installed. Off-road vehicle use has been restricted through installation of gates and a guardrail by the City of San Diego's Park and Recreation Department. Landowners within Del Mar Mesa have not reported any off-road activity following the installation of the guardrail.

Carmel Valley Neighborhood 8A

1. Redirect human access from vernal pools and dudleya populations through signage and fencing as necessary to delineate and protect the sensitive species.

The proposed trail plan proposes closure of trails that are near vernal pools and dudleya populations. Fencing and educational signage are in place in critical areas to limit impacts to these habitats.

2. Develop an equestrian use plan including a trail system so as to avoid as much as possible wetlands and other highly sensitive areas.

The NRMP and proposed trail plan fulfill this MSCP requirement for development of an equestrian use plan. The proposed trail system does not include direct impacts to wetlands, vernal pools, or other sensitive vegetation.

3. Monitor this sensitive area for off-road and off-trail use, and take necessary measures to prevent such use, and repair damage (at minimum, closure of areas) as soon as feasible. Also assess for invasive plant species and remove as soon as possible.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Carmel Mountain is patrolled regularly by City ranger staff. Vehicle gates and fences have been installed where necessary to prevent off-road and off-trail use. Invasive species removal is recommended by the NRMP.

4. Use some of the existing dirt roads for trails, and avoid cutting new trails through habitat areas. Restore/revegetate dirt roads (not used as trails) and other disturbed areas to the appropriate habitat (maritime chaparral, vernal pool, grassland, coastal sage scrub, as determined by biologists.

The proposed trail system utilizes existing access roads with some additional segments of existing dirt paths. No new trails are proposed to be cut through existing habitat. As part of the development of the proposed trail system, 13.29 miles of existing paths were identified for closure and restoration.

The proposed trail system was evaluated based on the criteria included in these management directives (e.g. sensitive species, erosion, appropriate use type and frequency), and will be signed both at access points and at trail intersections. Complete trail surveys are conducted annually by Park staff and trail maintenance projects are implemented as necessary based on survey results. The proposed project, if approved, will complete implementation of the above management directives through significantly lowering the number of trail-miles within the Preserves from existing conditions and providing increased buffers for sensitive species.

Therefore, implementation of the Mitigation Framework for Biological Resources, MHPA Land Use Adjacency Guidelines and the Biological Resources Management Guidelines in the NRMP would reduce potential impacts to below a level of significance.

XI. MINERAL RESOURCES – Would the project?

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

The Preserve areas are underlain by the surficial soils, the Scripps Formation, Torrey Sandstone and the Poway Conglomerate, which do not contain mineral resources. The loss of known mineral resources, valuable locally or regionally, would not occur as a result of the project. Therefore, the Project would not result in any impacts associated with mineral loss.

- b) Result in the loss of availability

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				

The project site is not currently mined and is not designated for future mining activities. As such, no impacts to mineral resources would occur.

XII. NOISE – Would the project result in:

- a) Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Uses associated with the Project would be consistent with current passive recreational uses of the Preserves. The Project would not generate excessive noise levels beyond what is allowed in accordance with the General Plan, associated community plans, and the Municipal Code. Impacts would be less than significant.

- b) Exposure of persons to, or generation of, excessive ground borne vibration or ground borne noise levels?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

NRMP implementation would not include drilling, mechanical hammering, or pile driving, so vibration and ground-borne noise would not be generated. Thus, no exposure to ground vibration or noise would occur.

- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

Project-related noise generation would be limited to short-term construction activities and minor noise resulting from operation of a small bobcat during revegetation/restoration efforts associated with implementation of future trail closures. As noted above in response XII(a), the Project would not generate excessive noise levels beyond what is allowed in accordance with the General Plan, associated community plans, and the Municipal Code, and no significant increases in permanent ambient noise levels would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

As discussed in response XII(c), the Project would result in temporary increases in ambient noise levels when the use of small mechanized equipment is necessary to complete revegetation/restoration efforts associated with trail closures; however, such impacts would be within the limits specified in the Noise Ordinance. Impacts related to temporary or periodic noise increases would be less than significant.

e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The Preserves are not located within an airport land use plan for a public or public use airport. Thus, users would not be exposed to excessive aircraft noise.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Preserves are not located within the vicinity of a private airstrip and therefore, excessive aircraft noise levels would not be experienced by persons within and adjacent to the Preserves.

XIII. POPULATION AND HOUSING – Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
indirectly (for example, through extension of roads or other infrastructure)?				

The Project would not directly or indirectly induce population growth.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

There is no existing or planned housing within the project boundaries. Thus, no housing would be displaced by approval of the Project.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

As discussed in responses XIII.a. and XIII.b, implementation of the Project would not displace any persons or housing.

XIV. PUBLIC SERVICES

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

- | | | | | |
|--------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| i) Fire Protection | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

The Project would not affect or generate a need for new or altered fire protection; effects on fire protection would not occur. Thus, no new facilities would be required which could result in physical changes to the environment.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Police Protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>The project does not propose any uses that would require any increase in police protection services. Thus, no new facilities would be required which could result in physical changes to the environment.</i>				
iii) Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>The project would not generate any students. Thus, the Project would not adversely affect schools.</i>				
v) Parks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>The purpose of the project is to provide guidance for the management of the Preserves and protection of the scenic, natural, cultural, and historical resources. The Project is consistent with the existing uses and would not adversely affect passive use of the Preserves. In fact, the Project would have a positive effect both Preserves.</i>				
vi) Other public facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Adequate services are available to support the proposed project.</i>				

XV. RECREATION –

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

The proposed project does not include housing or schools and would not increase the use of existing parks or recreational facilities in the vicinity of the Preserves. The Project would provide guidance for the management of the Preserves and protection of the scenic, natural, cultural, and historical resources. The Project is consistent with the existing uses and would not adversely affect passive recreational use of the Preserves. In fact, the Project would have a positive effect on both Preserves.

- b) Does the project include recreational facilities or require
- | | | | |
|--------------------------|-------------------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|-------------------------------------|--------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

The NRMP includes provisions for improvement to existing trails and closure of unauthorized trails and is considered a recreational facility within the Preserves. Future improvements as well as revegetation and restoration efforts have the potential to result in significant but mitigable impacts as identified elsewhere in this checklist. Implementation of the applicable Mitigation Framework will reduce potential impacts to below a level of significance.

XVI. TRANSPORTATION/TRAFFIC –
Would the project?

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

The Project does not have the scope or scale that would introduce a substantial amount of vehicle trips into the area and therefore no conflicts with existing circulation systems would occur.

- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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highways?

As discussed in response XVI(a), above, the proposed project would not conflict with an applicable congestion management program, and no impacts would occur.

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project does not proposed any structures or components that would affect air traffic patterns. As such, no impact would occur.

- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

The Project does not have the scope or scale that would increase hazards related to traffic; therefore, no impact would occur.

- e) Result in inadequate emergency access?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project incorporates measures to allow adequate fire and police emergency access to the site. Thus, the project would not result in inadequate emergency access.

- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

The Project is consistent with the community plan Open Space designation and would not conflict with any adopted policies, plans or programs regarding public transit, bicycle or pedestrian facilities or otherwise decrease the performance or safety of such facilities. Thus, implementation of the Project would not conflict with policies encouraging alternative forms of transportation and would, in fact, promote those polices.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>The project would result in standard consumption and would not exceed wastewater treatment requirements of the RWQCB.</i>				
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>The Project would not result in uses which would require construction or expansion of water or wastewater treatment facilities. As discussed earlier, the Preserves are not connected to public water or wastewater facilities and adoption of the NRMP would not change this fact. Thus, the Project would not affect existing water and wastewater treatment facilities serving the area.</i>				
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>The Project would not result in uses which would require construction of new storm water drainage facilities. As discussed earlier, the Preserves are not connected to infrastructure and adoption of the NRMP would not change this fact. Thus, the Project would not significantly impact existing storm drain facilities.</i>				
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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As discussed in response XVII(b), no new water entitlements would be required, and the project would have no impact on existing water resources.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Wastewater would not be generated on site. The project would not require or result in the construction of new wastewater treatment facilities or the expansion of existing wastewater treatment facilities. Accordingly, no associated impact would occur.

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

While some waste may be generated during trail closure, it would be limited in nature and would be directed to the appropriate City landfill after consultation with Environmental Services Department. The project would comply with Greenbook Section 802. As implementation of the project would not substantially change the ongoing passive recreational uses of the Preserves, there would be no significant increase in the amount of solid waste generated. Thus, the project would not significantly impact the City's solid waste disposal facilities.

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| g) Comply with federal, state, and local statutes and regulation related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The proposed project would comply with all applicable, federal, state, and local statutes and regulations related to solid waste. Thus, no impact would occur with respect to compliance with solid waste regulations.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE –

- | | | | | |
|------------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Does the project have the | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|------------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The project has a potential to result in impacts to land use (MSCP/MHPA), biological resources, and cultural resources, as described in the applicable sections of this Initial Study. However, implementation of the Mitigation Framework, along with management guidelines and recommendations of the NRMP and MSCP Subarea Plan identified in this Initial Study, would reduce all impacts to a below level of significance.

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

As noted above, future projects implemented in accordance with the Trails Plan and NRMP has the potential to impact Land Use (MHPA), Biological and Cultural Resources. However, implementation of the Mitigation Framework, along with management guidelines and recommendations of the NRMP and MSCP Subarea Plan identified in this Initial Study, would reduce all impacts to a below level of significance. Therefore, impacts associated with this project, combined with other closely related past, present and reasonably foreseeable future projects would not result in a cumulatively considerable incremental effect on biological resources, cultural resources, or land use associated with the MHPA.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The City of San Diego conducted this Initial Study which determined that the Project could have a significant effect in the following issues areas: Land Use (MSCP/MHPA), Biological Resources and Historical Resources (Archaeology). Any potential environmental effects on human beings resulting from this project could be reduced or eliminated through standard project design measures and/or compliance with applicable local, state or federal regulations. In addition, implementation of the Mitigation Framework, along with management guidelines and recommendations of the NRMP and MSCP Subarea Plan identified in this Initial Study, would reduce all impacts to a below level of significance.

INITIAL STUDY CHECKLIST

REFERENCES

I. Aesthetics / Neighborhood Character

- City of San Diego General Plan.
- Community Plan.
- Local Coastal Plan.

II. Agricultural Resources & Forest Resources

- City of San Diego General Plan.
- U.S. Department of Agriculture, Soil Survey - San Diego Area, California, Part I and II, 1973.
- California Agricultural Land Evaluation and Site Assessment Model (1997)
- Site Specific Report:

III. Air Quality

- California Clean Air Act Guidelines (Indirect Source Control Programs) 1990.
- Regional Air Quality Strategies (RAQS) - APCD.
- Site Specific Report:

IV. Biology

- City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
- City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996.
- City of San Diego, MSCP, "Multiple Habitat Planning Area" maps, 1997.
- Community Plan - Resource Element.
- California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered, Threatened, and Rare Plants of California," January 2001.
- California Department of Fish & Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California," January 2001.
- City of San Diego Land Development Code Biology Guidelines.
- Site Specific Report: Biological Technical Report for the Carmel Mountain and Del Mar Mesa Natural Resources Management Plan (City of San Diego January 2014); Biological Resources Appendix to the NRMP (RECON 2002) and NRMP (2011).

V. Cultural Resources (includes Historical Resources)

- City of San Diego Historical Resources Guidelines.
- City of San Diego Archaeology Library.
- Historical Resources Board List.
- Community Historical Survey:
- Site Specific Report: Cultural Resources Study for the Carmel Mountain and Del Mar Mesa Natural Resources Management Plan (Affinis, August 2013); Cultural Resources Appendix to the NRMP (RECON 2002) and NRMP (2011).

VI. Geology/Soils

- City of San Diego Seismic Safety Study.
- U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975.
- Site Specific Report: Carmel Mountain and Del Mar Mesa Natural Resources Management Plan (April 2011).

VII. Greenhouse Gas Emissions

- Site Specific Report: Air Quality and Greenhouse Gas Technical Report for the Torrey Pines City Park General Development Plan. HELIX. November 29, 2011.
- Site Specific Report:

VIII. Hazards and Hazardous Materials

- San Diego County Hazardous Materials Environmental Assessment Listing.
- San Diego County Hazardous Materials Management Division.
- FAA Determination.
- State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized.
- Airport Land Use Compatibility Plan.
- Site Specific Report:

IX. Hydrology/Water Quality

- Flood Insurance Rate Map (FIRM).
- Federal Emergency Management Agency (FEMA), National Flood Insurance Program - Flood Boundary and Floodway Map.
- Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html.
- Site Specific Report:

X. Land Use and Planning

- City of San Diego General Plan.
- Community Plan.
- Airport Land Use Compatibility Plan.
- City of San Diego Zoning Maps.
- FAA Determination.

XI. Mineral Resources

- California Department of Conservation - Division of Mines and Geology, Mineral Land Classification.
- Division of Mines and Geology, Special Report 153 - Significant Resources Maps.
- Site Specific Report:

XII. Noise

- Community Plan.
- San Diego International Airport - Lindbergh Field CNEL Maps.
- Brown Field Airport Master Plan CNEL Maps.
- Montgomery Field CNEL Maps.

- San Diego Association of Governments - San Diego Regional Average Weekday Traffic Volumes.
- San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG.
- City of San Diego General Plan.
- Site Specific Report:

XIII. Paleontological Resources

- City of San Diego Paleontological Guidelines.
- Deméré, Thomas A., and Stephen L. Walsh, "Paleontological Resources City of San Diego," Department of Paleontology San Diego Natural History Museum, 1996.
- Kennedy, Michael P., and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7 1/2 Minute Quadrangles," California Division of Mines and Geology Bulletin 200, Sacramento, 1975.
- Kennedy, Michael P., and Siang S. Tan, "Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," Map Sheet 29, 1977.
- Site Specific Report: Carmel Mountain and Del Mar Mesa Natural Resources Management Plan (April 2011).

XIV. Population / Housing

- City of San Diego General Plan.
- Community Plan.
- Series 11 Population Forecasts, SANDAG.
- Other:

XV. Public Services

- City of San Diego General Plan.
- Community Plan.

XVI. Recreational Resources

- City of San Diego General Plan.
- Community Plan.
- Department of Park and Recreation
- City of San Diego - San Diego Regional Bicycling Map
- Additional Resources: Carmel Mountain and Del Mar Mesa Natural Resources Management Plan (April 2011).

XVII. Transportation / Circulation

- City of San Diego General Plan.
- Community Plan.
- San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG.
- San Diego Region Weekday Traffic Volumes, SANDAG.
- Site Specific Report:

XVIII. UTILITIES

 X City of San Diego General Plan.

 X Community Plan.

XIX. WATER CONSERVATION

 Sunset Magazine, New Western Garden Book. Rev. ed. Menlo Park, CA: Sunset Magazine.