ATTACHMENT B

County of San Diego

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Department of Parks and Recreation
5500 OVERLAND AVENUE, SUITE 410, SAN DIEGO, CA 92123

~~October 2019~~January 2020

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

1. **Project Title:** Otay Valley Regional Park - Bike Skills Park Project

2. **Lead Agency Name and Address:** County of San Diego
Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, CA 92123

3. **Contact Person and Phone Number:** Kiran Kaur
Land Use/Environmental Planner
858-966-1378

4. **Project Location:** The project site is located in the Otay Valley Regional Park in the City of San Diego, County of San Diego California. The project site is located on a portion of three lots: the north end of APN 624-070-01-00, and the northeast portion of APNs 631-013-35-00 and 631-013-37-00.

5. **Project Sponsor's Name and Address:** County of San Diego
Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, CA 92123

6. **General Plan Designation(s):** Otay Mesa-Nestor Community Plan
Low Density / Open Space

7. **Zoning:** AR-1-1(Agricultural-Residential)/
OF-1-1(Open Space-Floodplain)

8. **Description of Project:**

The proposed project would create a new 3.2-acre bike skills park facility in the Otay Valley Regional Park (OVRP), Recreation Area 6, in south San Diego County. **Figure 1** shows the regional location of the project site. The OVRP is the result of a multi-jurisdictional planning effort by the County of San Diego, the City of San Diego, and the City of Chula Vista. In 1990, the three jurisdictions entered in a Joint Exercise of Power Agreement to coordinate planning, acquisition, and design of the OVRP. The OVRP was created to provide opportunities for hiking, biking, and horse trails, while also protecting open space, wildlife,

agricultural, and cultural resources. The County of San Diego is the lead agency for the proposed project, and is responsible for design, environmental review and construction. City of Chula Vista owns the project site and will be responsible for managing and maintaining the bike skills park. The project requires the approval of a Memorandum of Agreement by the County of San Diego, City of Chula Vista, and the City of San Diego.

SOURCE: SanGIS

COSD DPR 557744 TO 07 Rios Bike Skills Park

Figure 1
Regional Location

ESA

The OVRP is located approximately four miles north of the International Border and extends from the salt ponds at the mouth of the Otay River in Imperial Beach to the Upper Otay Lakes Reservoir. The project site for the proposed bike skills facility is located within the OVRP, approximately 3.5 miles east of the salt pond, south of a single-family and multi-family residential neighborhood, as shown in **Figure 2**. The project site is located predominately in the northern portion of parcel APN 624-070-01-00 and partially in the northeastern portion of parcels APNs 631-013-35-00 and 631-013-37-00. The project site is bound by residential development along the south side of Rancho Drive to the north, and vegetated land in OVRP to the south, west, and east (with Interstate 805 (I-805) located further east). The project site, which has a relatively flat topography, has been previously disturbed and contains an access road used to maintain the existing San Diego Gas & Electric (SDG&E) transmission line and several informal trails that traverse the site. The site is vegetated with low-lying shrubs, bushes, and grasses with very few trees and is located near a high-density neighborhood.

Figure 3 shows the conceptual site plan for the project. The project site could be accessed from an east entrance or a west entrance as shown on Figure 3. The east entrance would allow access to the site via Rancho Drive where there is currently a locked gate for OVRP maintenance access. The west entrance would allow access via Rios Avenue to the west. The proposed project would expand recreation resources in the OVRP and would be managed by the City of Chula Vista. As shown in Figure 3, the project is separated into various areas dedicated to different bike skills facilities, where the various areas include a Kids Park, Pump Track, Jump Park, Skills Trail, and Access Trails and Roads. These primary project components are described in detail below and shown on **Table 1**.

TABLE 1
PROJECT COMPONENTS

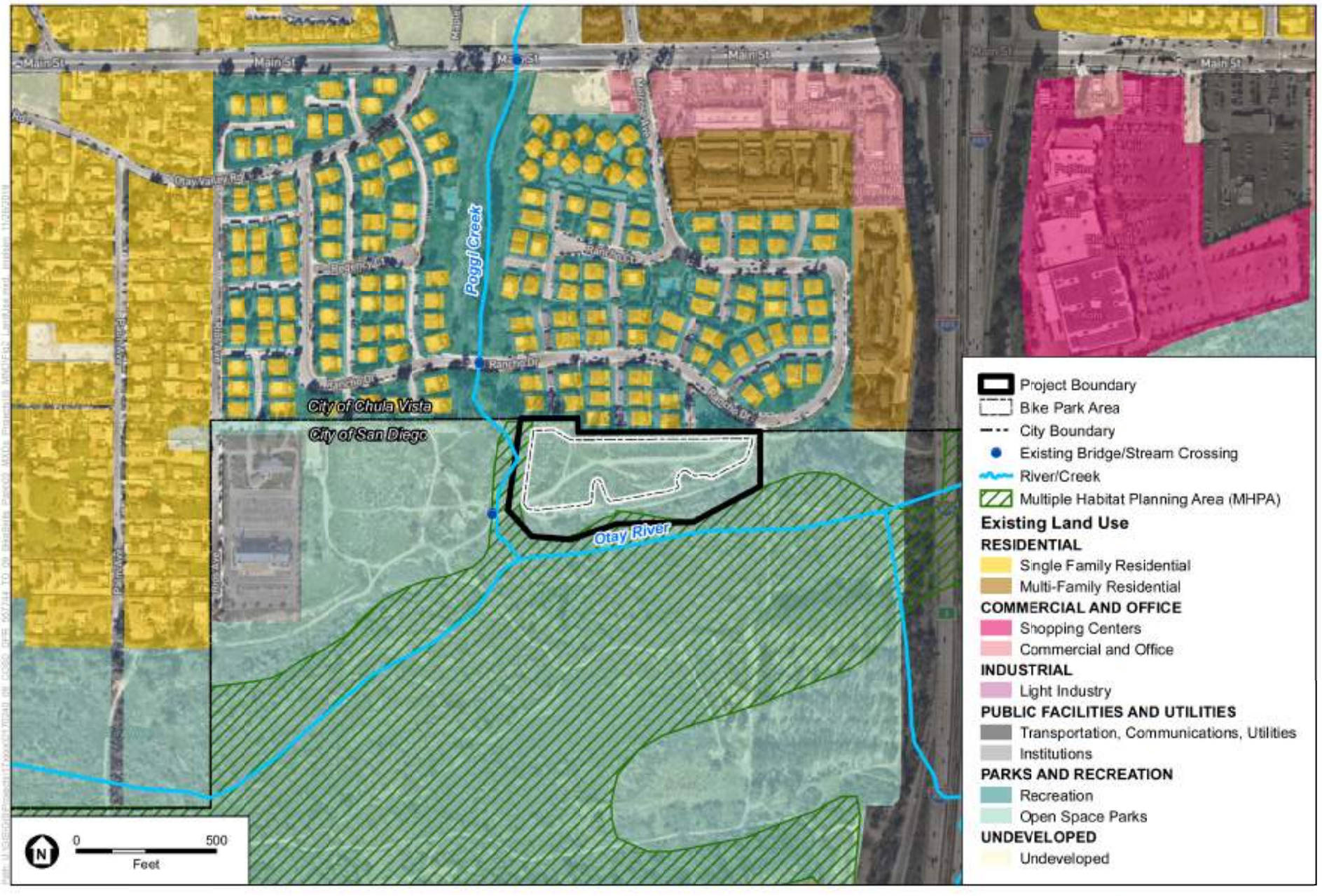
Zone	Linear Feet[1]	Width (feet)[1]	Grading Area (sq/ft)	Total Area (sq/ft)
Zone 1: Kids Park	**250**	**4**	**1,500**	**3,500**
Zone 2: Chill Zone	**-**	**-**	**1,250**	**3,500**
Zone 3: Jump Park	**1,000**	**4**	**4,000**	**17,000**
Zone 4: Pump Track	**1,000**	**6**	**6,000**	**20,000**
Zone 5: Skills Trail	**2,000**	**4**	**8,000**	**8,000[2]**
Total	4,250	-	20,750	52,000

[1] Provided for zones with trail or track component.

[2] Approximate based on grading area

Zone 1: Kids Park

The Kids Park would be located adjacent to the east entrance, where access is provided via Rancho Drive. The Kids Park area would contain a riding track and several features designed for younger and/or beginner riders, including small rollers, berm turns and ladder bridges. The track would be soil stabilized and protected by a durable surface system (DSS) carpet to minimize dust, eliminate the need for pesticides, and create a safe riding experience. The Kids Park would be approximately 3,500 square feet with trails totaling 250 linear feet with a 4-foot width. The Kids Park would require approximately ~~1,000~~ 1,500 square feet of grading to establish this area.



SOURCE: SanGIS 2019

D170240.09 COSD DPR 557744 TO 09 Rios Bike Skills Park

Figure 2
Project Location

ESA

NOTE:
ENVIRONMENTAL PROTECTION BOUNDARIES SHALL BE IDENTIFIED AND FLAGGED IN THE FIELD PRIOR TO LAYOUT OF ALL TRAIL ALIGNMENTS AND FEATURES AND THEIR SUBSEQUENT CONSTRUCTION.

MAP KEY

- BIKE PARK PROJECT BOUNDARY
- EXISTING ACCESS ROAD (NARROWED 20'-12' WIDE)
- EXISTING ACCESS TRAIL (NARROWED 20'-4' WIDE)
- PROPOSED BIKE TRAIL (4' WIDE)
- PROPOSED BIKE TRACK (6' WIDE)
- AREA TO BE RESTORED THROUGH NARROWING
- POST AND RAIL FENCING
- INFRASTRUCTURE FEATURE
- TRAIL INTERSECTION POINT
- MHPA ENV. BOUNDARY 1/8/20
- ENV. BOUNDARY 5/16/19

NOTES:
1. TRAIL LINEWORK SHOWS THE LIMITS OF THE CLEARING, GRUBBING AND GRADING OPERATIONS.
2. THE TOTAL AREA TO BE GRADED AS SHOWN IS ~25,000SF.
3. THE TOTAL AREA TO BE RESTORED THROUGH NARROWING IS ~5,00SF.

SITE INFO:
PROJECT AREA: 3.2 ACRES
MAX ELEVATION: 105'
MIN ELEVATION: 90'
TOTAL ELEVATION: 10'

SCALE= 100'

OTAY VALLEY REGIONAL BIKE PARK – CONCEPT PLAN V2.0C

PROJECT OWNER:
SAN DIEGO COUNTY PARKS AND RECREATION

PRIME:
MW PELTZ + ASSOCIATES, INC.

BIKE PARK DESIGNER:
HILRIDE
HILRIDE PROGRESSION DEVELOPMENT GROUP LLC.

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PROJECT:
OTAY VALLEY REGIONAL CONCEPT PLAN V2.0

DESIGNER: NAT LOPES
DATE: 5/13/19
SHEET TITLE: CONCEPT PLAN
SHEET NUMBER: BP-00
PLANSET NUMBER: 1 OF 1

Figure 3: Conceptual Site Plan

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Zone 2: Chill Zone

The Chill Zone area would be located south of the east entrance in the eastern portion of the project site. The Chill Zone would be approximately 3,500 square feet and would require approximately 1,250 square feet of grading. The Chill Zone would use an existing concrete viewing bench, providing a rest area with picnic tables for visitors and users of the project.

Zone 3: Jump Park

The Jump Park area would be located in the northeastern portion of the project site and would be approximately 17,000 square feet with trails totaling 1,000 linear feet with a 4-foot width. The Jump Park would be designed to use prefabricated metal framed wood surface jumps which would eliminate the need to create jump facilities with imported soil material or grading of the existing soil.

The Jump Park includes one beginner and one intermediate jump line with a return trail. Each of the jump lines would have a series of jump and rollers that increase in size through each run. The last jump in the intermediate jump line would have a prefabricated kicker ramp and a dirt landing. The dirt landing would be stabilized and protected with a safety landing pad and a DSS carpet to create a safe jumping experience for riders. Between the jump features the trail would be stabilized and protected with the DSS carpet to reduce dust and eliminate the need for pesticides/invasive species control along the track. The Jump Park would require approximately 4,000 square feet of grading to establish this area.

Zone 4: Pump Track

The Pump Track would be located in the middle of the project site and would be approximately 20,000 square feet with trails totaling 1,000 linear feet with a 6-foot width. The Pump Track area features a modular prefabricated pump track that can be reconfigured into different track layouts depending on user demand. The modular pump track system minimizes maintenance need by providing a stabilized surface. The entry and exit areas to the pump track would be installed with DSS carpet to minimize tracking of dirt onto the track. The Pump Track would require approximately 6,000 square feet of grading to establish this area.

Zone 5: Skills Trail

The Skills Trail would contain 2,000 linear feet of trails with a 4-foot width. The Skills Trail would be designed to provide riders with optional features that range in difficulty from beginner to expert level. Each feature would contain signage that designates the difficulty level and provides a unique riding challenge and experience. The natural surface trails would be stabilized and maintained over time to minimize dust and erosion, so that the trails provide the same level of service as when constructed. The Skills Trail would require approximately 8,000 square feet of grading to establish this area.

Access Trails and Roads

In addition to providing various types of trails for bicyclists within the project site, the project would also improve the existing access road and network of trails that currently transect the project site. The project would narrow some of the access roads and trails. The access trails and roads were incorporated into the conceptual site plan to maintain and improve, where feasible, community access to the project site.

Construction

Construction of the project is anticipated to occur over a six-month period, ending in Fall 2020. Construction activities would consist of clearing, grubbing, mass grading, rough grading, and fine grading operations. The equipment used would include, but not be limited to, bulldozers, frontend loaders, dump trucks, skid steers, excavators, mini excavators, gold carts (for final compaction), tillers, plate compactors, jumping jack compactors, and various power tools/hand tools. As shown on Table 1, the total graded area of site is expected to be approximately 20,750 square feet, which includes all trails, features and riding areas for the project. The total restoration area of the disturbed vegetated areas is anticipated to be approximately 5,000 square feet, which includes the restoration and narrowing of one of the main access roads.

In addition to the aforementioned construction activities, the project also includes several design features that would help minimize construction and maintenance costs and impacts. The project has been designed to work within existing environmental constraints of the project site and to incorporate materials which help to alleviate robust maintenance activities. For example, the project requires minimal clearing, grubbing, and grading activities to help minimize the construction footprint and to use the existing network of access roads and trails onsite. Another project design feature includes the use of prefabricated materials to eliminate the need to import fill to create project features during construction and minimizes long term maintenance impacts. The following BMPs would occur during construction: the contractor would be required to ensure construction equipment would be properly installed with functioning noise muffler systems; the contractor would ensure equipment is operated and maintained in accordance with manufacturer specifications; and the contractor would stage noise generating equipment away from noise-sensitive receptors.

The project would also use products intended to stabilize the dirt surfaces of the tracks, trails, and riding feature surfaces. The stabilization activities include the application of pesticides to prevent weed or plant growth on the track, trail and riding feature surfaces, and application of soil binding products to stabilize the structure of the soil. These stabilization activities would help long-term maintenance, minimize air quality impacts, and minimize erosion and dust. After construction of the tracks, trails, and riding features, the majority of the project features would be protected though use of the DSS in conjunction with the stabilization products. The DSS minimizes routine maintenance, including the need for soil stabilization, vegetation management, and dust and wind erosion control; eliminates the need for water and moisture conditioning of the riding tracks, trails, and riding surfaces; and helps control stormwater runoff pollution.

Facility Management and Operations

The project would be open year-round from sunrise to sunset, which is similar to the existing hours of operation at the OVRP. No new sources of lighting would be provided by the project. Park users may access the new facility to the east from Rancho Drive or existing OVRP trails and from the west from the Rios Staging Area or existing OVRP trails. The project is designed to serve the surrounding neighborhoods, which is reflected in the scale of the project, and therefore is not anticipated to draw a substantial number of park users from outside of the community. No new parking areas are proposed as part of the project, as on-street parking is available along Rancho Drive or via the existing Rios Staging area. The Rios Staging area includes ten parking spaces, including one that is compliant with requirements associated with the Americans with Disabilities Act (ADA).

Any maintenance that occurs would be isolated to the pump track area and is limited to the six-foot width of the track. Maintenance and operations of the proposed facility would be managed by City of Chula Vista. Other maintenance includes general trail maintenance and maintenance of dirt features on an as-needed basis. In addition, the City's Public Utilities Department may access the project site

on an as-needed basis, with coordination and approval of the City of Chula Vista, for maintenance of the sewer pipe that is located on the northern boundary of the project site. Trash removal would also be provided as part of operation and maintenance of the project.

9. Surrounding Land Uses and Setting.

Surrounding land uses include residential, recreational, open space conservation, public agency lands, and vacant/undeveloped land. I-805 is located to the east of the project site. The site is located north of the Otay River and adjacent open space areas are primarily part of the existing OVRP.

10. Other public agencies whose approval is required

The project requires the approval of a Memorandum of Agreement by the County of San Diego, City of Chula Vista, and the City of San Diego. The project would require a General Construction Stormwater Permit from the San Diego Regional Water Quality Control Board (RWQCB).

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

In accordance with Assembly Bill (AB) 52, the County of San Diego mailed out tribal consultation letters to tribes traditionally and culturally affiliated with the project area on July 19, 2019.

Environmental Factors Potentially Affected

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

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial study:

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

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

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	Date
Kiran Kaur	Land Use/Environmental Planner
Printed Name	Title

Environmental Checklist

Aesthetics

Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
I.	**AESTHETICS —** Except as provided in Public Resources Code Section 21099, would the project:				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c)	Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** The proposed project is located in the Otay River Valley, which is a natural, vegetated corridor located in the middle of an urban, developed landscape. The Otay River Valley corridor provides visual relief from the otherwise developed landscape, which is specifically identified as a valued scenic resource component in the City of Chula Vista's General Plan (City of Chula Vista, 2005). The City of San Diego's Otay Mesa-Nestor Community Plan (Community Plan) includes the project site in the Otay Valley Regional Park (OVRP). The OVRP contains outstanding scenic, natural and cultural resources and recreational opportunities as a resource-based park.

The OVRP park will link San Diego Bay to the Otay Lakes with a continuous east-west wildlife corridor and multipurpose trail system, will offer residents and visitors outstanding natural scenic and cultural features, and provide community and regional recreational and educational opportunities. OVRP will preserve and enhance environmentally sensitive resources, natural floodplain management, and control of urbanization, coupled with reclamation of the valley as a source of public enjoyment. The Otay Mesa-Nestor Community Plan also provides strategies for enhancing and preserving the resources within OVRP, which include protecting and preserving environmentally sensitive areas, restoring degraded habitat, and providing active and passive recreational opportunities. The Community Plan strategies for OVRP include providing "active and passive regional recreational opportunities" and providing a continuous east-west trail system for hiking, biking, and equestrian use. The Community Plan strategies for OVRP include providing "active and passive regional recreational opportunities" and providing a continuous east-west trail system for hiking, biking, and equestrian use.

The Community Plan designates the project area on which construction will occur predominantly as Low-Density Residential with some Open Space areas. The project is consistent with the

Community Plan designations because the project is located within the Community Plan designated OVRP and will implement the OVRP strategies specified in the Community Plan, including providing active and passive recreational opportunities and expanding the east-west trail system. The project will avoid the designated open space areas by avoiding the designated MHPA areas located on-site.

Construction of the proposed project would include the use of construction equipment, which would introduce temporary visual obstructions into the primarily natural, vegetated landscape of the project site and surrounding area. However, the degraded visual condition would only be temporary and would return to pre-construction conditions once construction is complete. Once the construction has ceased, the project would include low-profile features which would minimally alter the existing view of the project site within the Otay River Valley corridor. Furthermore, the relatively flat topography of the project site in combination with the low-lying nature of the project features would screen the effects of the project features so that the project would not substantially affect the quality of the Otay River Valley as a scenic vista. Therefore, impacts related to degrading a scenic vista would be less than significant.

b) **Less than Significant Impact.** There are no officially designated state scenic highways in the vicinity of the proposed project (Caltrans, 2019). According to City of Chula Vista's General Plan, the nearest scenic roadway is Main Street, east of Interstate 805 (I-805), approximately 0.3 miles northeast of the project site (City of Chula Vista, 2005). Given intervening structures and topography, the project site is not visible from this scenic roadway and implementation of the project would not affect the scenic resources of this roadway. Therefore, the proposed project would not substantially damage scenic resources along a state scenic highway or local roadway, and impacts would be less than significant.

c) **Less than Significant Impact.** The visual character of the project site consists of a predominately natural, vegetated site that has been previously disturbed and includes informal dirt trails throughout. The project site is located within the OVRP in the Otay Valley River corridor, which is a natural, vegetated corridor in the middle of an urban, developed landscape. As discussed above, the visual character of the project site would be temporarily degraded during construction of the project due to the introduction of construction equipment within the area. However, once construction is complete all construction equipment would be removed and the project site's visual character would be similar to pre-construction conditions. Once the project has been constructed, the project features would be low-lying in nature and would blend into the existing visual character of the project site as the majority of the project features consists of trails, ramps, and natural-looking materials. In addition, implementation of the project would be consistent with the recreational goals of the OVRP as the project would provide a bike skills park for recreational use to the surrounding community and would comply with applicable zoning and other regulations governing scenic quality. Therefore, the project would not substantially degrade the character or quality of the project site or its surroundings, and impacts related to visual quality of the project site would be less than significant.

d) **Less than Significant Impact.** The project does not propose to install any new light sources at the project site, because the facility would only be open during daylight hours (sunrise to sunset). The proposed project would also not require additional lighting during construction or maintenance because all work would be conducted during daylight hours. In addition, the project

would be comprised of natural-looking materials, such as wood and turf-like materials, that would have a low-lying profile, which would have low potential to create new sources of glare from the project site. Therefore, impacts related to introducing additional sources of light and glare would be less than significant.

References

California Department of Transportation (Caltrans), 2019. *Officially Designated Scenic Highway Map, San Diego County.* Available at: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed on June 27, 2019.

City of Chula Vista, 2005. *City of Chula Vista General Plan, Land Use and Transportation Element.* December 13, 2005. Available at: https://www.chulavistaca.gov/departments/development-services/planning/general-plan, accessed on June 27, 2019.

County of San Diego, 2011. *San Diego County General Plan.* August. Available at: https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/Cover-TOC-Vision.pdf, accessed on June 27, 2019.

Agriculture and Forestry Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
II. AGRICULTURE AND FORESTRY 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 Dept. 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 methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Discussion

a-e) **No Impact.** According to the California Department of Conservation (CDC), the project site is classified as "Other Land," which is land not included in any other mapping category (e.g., Prime Farmland or Unique Farmland) (CDC, 2016). Furthermore, implementation of the proposed project would not conflict with an existing zoning designation for agricultural use or a Williamson Act contract; be located in an area zoned as forest land, timberland, or a Timberland Production Zone; or, convert Farmland to non-agricultural use. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. No impacts to agricultural and forestry resources would occur.

References

California Department of Conservation (CDC), 2016. *San Diego County Important Farmland map.* Available at: https://www.conservation.ca.gov/dlrp/fmmp/Pages/SanDiego.aspx, accessed on June 27, 2019.

Air Quality

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
III. AIR QUALITY — Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** The project site is located in the San Diego Air Basin (SDAB), within the jurisdiction of the San Diego Air Pollution Control District (SDAPCD). SDAPCD is required, pursuant to the federal and state Clean Air Acts, to reduce emissions of criteria air pollutants for which the SDAB is currently in nonattainment of ambient air quality standards. The SDAB is currently classified as a federal nonattainment area for the 8-hour ozone (O_3) standard. Note, O_3 is not directly emitted, but rather formed by the combination of O_3 precursors of nitrogen oxides (NO_X) and volatile organic compounds (VOC) in the atmosphere in the presence of sunlight. In addition, the SDAB is classified as a state nonattainment area for the California standards for O_3, particulate matter less than 2.5 microns (PM2.5), and particulate matter less than 10 microns (PM10) (USEPA, 2019; CARB, 2018).

All areas designated as nonattainment are required to prepare plans showing how the area would meet the state and federal air quality standards by its designated attainment deadline. The San Diego Regional Air Quality Strategy (RAQS) is the region's applicable air quality plan for improving air quality in the SDAB and attaining federal and state air quality standards. The RAQS relies on information from the California Air Resources Board (CARB) and the San Diego Association of Governments (SANDAG), including projected population growth in the County, which is based in part on local general plans. A project is deemed inconsistent with air quality plans if it would result in population and/or employment growth that exceeds estimates used to develop applicable air quality plans, which, in turn, would generate emissions not accounted for in the regional emissions budgets.

The purpose of the proposed project is to construct a bike skills park that would allow for active recreational activities within the existing OVRP. The bike skills park is intended to serve the surrounding community, which is reflective in the scale of the project, and as such, is not anticipated to draw a substantial number of new park users to the site or increase the amount of park users from outside of the community. The proposed project would not permanently change the existing or planned transportation network or traffic patterns in the area nor would it add any

additional capacity to existing roadways. The project would be consistent with surrounding recreational uses, and activity would be similar to existing and planned uses. The proposed project would generate emissions during construction and operations (discussed below), but these emissions would be short term and are not expected to obstruct implementation of the RAQS. Therefore, the impact would be less than significant.

b) **Less than Significant Impact.** As stated above, the project site is within the SDAB, which is classified as a nonattainment area for certain federally and state-designated criteria pollutants, including O_3, PM10, and PM2.5. Project construction would use small-scale construction equipment and would occur over a six-month period. Construction emissions would vary from day-to-day and would include clearing, grubbing, mass grading, rough grading, and fine grading operations, as well as installation of prefabricated bike skills features using hand tools to eliminate the need to import fill to create project features during construction. Short-term emissions generated by construction of the project would be primarily associated with earthmoving activities. Project construction would comply with SDAPCD Rules and Regulations, including Rules 50, 51, and 55, which prohibit visible emissions, nuisance activities, and require fugitive dust control measures, respectively. For these reasons, the amount of emissions generated during construction would be minimal and would not have the potential to exceed SDAPCD thresholds.

Operation of the project would generate a similar amount of operational emissions as the site currently generates under existing conditions as the project would only change the type of recreational facility present onsite. The project would convert the type of recreational use onsite from passive walking trails to a bike skills park. The bike skills park is intended to serve the surrounding community, which is reflective in the scale of the project, and as such, is not anticipated to draw a substantial number of new park users to the site or increase the amount of park users from outside of the community. As discussed in Section XVII, *Transportation*, the project would not substantially increase operational vehicle trips or vehicle miles traveled (VMT). Therefore, project construction and operation emissions of O_3 precursors of VOC and NO_X, PM10, and PM2.5 would not substantially increase from baseline conditions. As a result, the project would not exceed ~~SQAMD~~ SDAPCD standards. Also, construction emissions would be temporary and localized, and the proposed project would comply with all required SDAPCD emissions and fugitive dust measures, which would ensure that the cumulative contribution of criteria pollutants during project construction would be less than significant.

Furthermore, SDAPCD significance thresholds were developed to ensure emissions in the air basin can meet or will maintain compliance with the state and federal ambient air quality standards. The standards were established at levels that provide public health protection and allow an adequate margin of safety, including protecting the health of sensitive populations such as asthmatics, children, and the elderly. As project-related construction and operational emissions would not exceed any regulatory thresholds, off-site receptors would not be exposed to emission levels in excess of the health-based ambient air quality standards. As such, construction and operation activities related to the implementation of the proposed project would not contribute to health effects related to these pollutants, and impacts would be less than significant.

c) **Less than Significant Impact.** Project construction emissions could potentially expose sensitive air quality receptors to air pollutant concentrations in the project area. Sensitive air quality receptors are facilities and structures where people, particularly, children, the elderly, and those with respiratory illnesses (e.g., asthma), live or spend considerable amounts of time, such as retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities. While the project site is a park and is not considered a sensitive receptor, the surrounding residences to the north along Rancho Drive would be considered sensitive receptors.

As stated above, project construction would use small-scale construction equipment and would occur over a six-month period, where the amount of emissions generated during construction would be relatively minimal and would not have the potential to exceed SDAPCD thresholds. Construction emissions would vary from day-to-day over the approximately six-month duration, where construction activities would include clearing, grubbing, mass grading, rough grading, and fine grading operations, as well as installation of prefabricated bike skills features using hand tools. As explained above, due to these limited construction activities over a short duration, construction of the proposed project would generate minimal emissions of criteria air pollutants and toxic air contaminants. Also, construction emissions would be temporary and localized, and the proposed project would comply with all required SDAPCD emissions and fugitive dust control measures, including applicable provisions of SDAPCD Rules 50, 51, and 55, which prohibit visible emissions, nuisance activities, and require fugitive dust control measures, respectively. Construction trucks would also be required to comply with the CARB Air Toxics Control Measure that limits idling to five minutes or less at any location to reduce public exposure to diesel particulate matter and other toxic air contaminants (Title 13 California Code of Regulations [CCR], Section 2485). Compliance with these control measures would ensure that sensitive receptors would not be exposed to substantial levels of pollutant concentration during project construction. Therefore, construction of the project would not expose sensitive receptors to substantial pollutant concentrations.

Once the proposed project is operational, criteria pollutant and toxic air contaminant emissions would not substantially increase compared to existing conditions. As the project would not change the site's current land use, there would be no new significant sources of criteria air pollutants and toxic air contaminants. As discussed in Section XVII, *Transportation*, the project would not substantially increase operational vehicle trips or VMT. Therefore, emissions would be minimal, and compliance with applicable SDAPCD and CARB rules, regulations, and control measures would ensure that nearby sensitive receptors would not be exposed to substantial pollutant concentrations. Impacts would be less than significant.

d) **Less than Significant Impact.** Project-related odor emissions would be minimal and would not affect a substantial number of people. During construction activities, short-term emissions from construction equipment may be evident in the immediate area on a temporary basis. Additionally, material deliveries and hauling heavy-duty truck trips could create an occasional "whiff" of diesel exhaust for nearby receptors. However, diesel odors would not be concentrated in a single location and would dissipate rapidly from the project site. These odors would not affect a substantial number of people because the scale of construction would be small. Furthermore, the project would use and install prefabricated materials on the site, which would eliminate odors that

are normally associated with on-site application of architectural coatings. Operation of the bike skills park would not produce objectionable odors, and there would be no new permanent sources of odors at the project site. Therefore, the proposed project would result in less than significant impacts related to odors.

References

California Air Resources Board (CARB). 2018. *Area Designations Maps/State and National*. Available: https://www.arb.ca.gov/desig/adm/adm.htm, accessed July 10, 2019.

U.S. Environmental Protection Agency (USEPA). 2019. *Criteria Pollutant Nonattainment Summary Report.* Accessed July 10, 2019. Available: https://www3.epa.gov/airquality/greenbook/ancl3.html

Biological Resources

Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
IV.	**BIOLOGICAL RESOURCES —** Would the project:				
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Discussion

a) **Less than Significant with Mitigation Incorporated.** A records review and biological resources survey was completed for the proposed project to determine the presence or potential presence of special-status species within the project site. The results are documented in the Biological Resources Letter Report (Appendix A) and summarized below.

The Biological Resources Letter Report determined the project may result in direct impacts to small mammals and reptiles with low mobility, including orange-throated whiptail, a California Department of Fish & Wildlife Species of Special Concern. However, it is anticipated that most mammals, reptiles, and birds would be able to move out of the way during grading. In addition, adequate habitat for these species is conserved by the Multiple Species Conservation Program (MSCP), which is a large-scale multiple-species conservation program implemented by the County of San Diego, City of Chula Vista, and City of San Diego. Through the MSCP, preserve lands are set aside to ensure conservation of a certain set of covered species. The overall MSCP is intended to ensure viability of the covered species such that individual project impacts, such as those anticipated as part of the proposed project, would not substantially reduce the viability of these species' populations. Therefore, no impacts would occur to small mammals and reptiles and no mitigation is required.

It was also determined that the project has the potential to directly impact migratory and nesting birds, including the federally endangered coastal California gnatcatcher, from the accidental destruction of nests through the removal of disturbed coastal sage scrub and disturbed land during the general bird breeding season (January 15 to September 15). Implementation of measure **MM-BIO-1** would require nest season avoidance or pre-construction surveys to ensure that impacts to migratory and nesting birds would be reduced to a less than significant level.

Lastly, it was determined that the proposed project may result in indirect impacts from noise generated during project construction should grading occur adjacent to occupied habitat in the Multi-Habitat Planning Area (MHPA). The MHPA is the area within which the preserve associated with the MSCP would be assembled and managed to ensure long-term viability of covered species. The proposed project site is located within or immediately adjacent to the City of San Diego's MHPA. Potential noise-related impacts could occur within the MHPA during the breeding season for the following species: coastal California gnatcatcher, least Bell's vireo, southwestern willow flycatcher, tri-colored blackbird, northern harrier, and Cooper's hawk. Implementation of measure **MM-BIO-1** would reduce potential indirect impacts to nesting northern harriers and Cooper's hawks within the MHPA to less than significant levels. Implementation of measure **MM-BIO-2** would reduce potential indirect impacts to nesting coastal California gnatcatcher, least Bell's vireo, southwestern willow flycatcher, and tri-colored blackbird within the MHPA to less than significant levels.

Additionally, the Land Use Adjacency Guidelines from the City of San Diego MSCP Subarea Plan (1997) requires the following consideration:

Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.

MM-BIO-1: Nesting Season Avoidance or Pre-Construction Survey. If construction initiation occurs between January 15 and September 15, a pre-construction nesting bird and raptor survey of the project area and an appropriate buffer of up to 900 feet from the construction area shall be completed by a qualified biologist prior to vegetation removal. The pre-construction survey shall be conducted within 3 ~~10~~ calendar days prior to the start of construction activities (including removal of vegetation). If any active nests are detected, the area shall be flagged and mapped on construction plans along with a buffer as recommended by the qualified biologist. The buffer area(s) established by the qualified biologist shall be avoided until the nesting cycle is complete or it is determined that the nest is no longer active. The qualified biologist shall be a person familiar with bird breeding behavior and capable of identifying the bird species of San Diego County by sight and sound and determining alterations of behavior as a result of human interaction. Barriers shall be based on MSCP barrier requirements and/or local topography and line of sight, species behavior and tolerance to disturbance, and existing disturbance levels, as determined appropriate by the qualified biologist.

MM-BIO-2: No clearing, grubbing, grading, or other construction activities shall occur between March 1 and August 30, until the following requirements have been met:

Between March 1 and August 30, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of the MHPA. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the County Department of Parks and Recreation (DPR) ~~(or appointed designee)~~, in consultation with the City of Chula Vista, at least two weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; or

If construction occurs within breeding season, at least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities shall not exceed 60 dB(A) hourly average at the edge of the MHPA. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB(A) hourly average. Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB (A) hourly average or to the ambient noise level if it already exceeds 60 dB (A) hourly average. If not, other measures shall be implemented in consultation with the biologist and DPR (or appointed designee), as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 30).

With the incorporation of each of the above measures, the proposed project would result in less than significant impacts.

b) **Less than Significant with Mitigation Incorporated.** The Biological Resources Letter Report (Appendix A) identified a total of 6.77 acres of potential impacts to vegetation communities and land cover types outside of the MHPA, including 5.14 acres of disturbed Diegan coastal sage scrub and 1.63 acres of disturbed habitat (**Figure 6**). The project will impact two APNs which consist of a total of 30 acres. Of these 30 acres, about 16.8 consist of MHPA. For APN 624-070-0100, which is 20 acres, the MHPA percentage is 62.3%. For APN 631-013-3500, which is 10 acres, the MHPA percentage is 42.8%. -The project was designed to avoid all impacts within the MHPA. **Table 1** summarizes permanent and temporary impacts to the vegetation communities and land cover types that could occur within the project impact area due to implementation of the proposed project. Impacts to disturbed Diegan coastal sage scrub are considered potentially

significant, but would be reduced to a level of less than significant through implementation of **MM-BIO-3**, which requires ~~a 1:1 mitigation ratio for permanent impacts to Diegan coastal sage scrub and a 1.5:1 mitigation ratio for temporary impacts to Diegan coastal sage scrub.~~ on-site preservation of MHPA designated areas. Impacts to disturbed habitat are considered less than significant and would not require mitigation.

TABLE 2
VEGETATION COMMUNITIES AND LAND COVER TYPES, IMPACTS, & MITIGATION

Vegetation Community/Land Cover Type	Existing Acreage Within the BSA	Permanent Impacts (Acres)	Temporary Impacts (Acres)	Mitigation Ratio	Required Mitigation (Acres)
Riparian and Wetlands					
Southern Arroyo Willow Riparian Forest (61320)	3.52	0.00	0.00	NA	0.00
Coastal and Valley Freshwater Marsh (52410)	0.66	0.00	0.00	NA	0.00
Southern Riparian Scrub (63300)	0.60	0.00	0.00	NA	0.00
Alkali Seep (45320)	0.14	0.00	0.00	NA	0.00
Uplands					
Diegan coastal sage scrub – Disturbed (32500)	7.65	0.78	4.36	1.1 ~~to 1.5:1~~	~~7.32*~~5.14
Other Land Cover Types					
Disturbed (11300)	2.75	0.31	1.32	NA	0.00
Urban/Developed (12000)	2.68	0.00	0.00	NA	0.00
Total Acres	18.00	1.09	5.68	-	7.32

~~* Mitigation assumes permanent impacts would be mitigated off-site inside the MHPA at a ratio of 1:1, totaling 0.78 acre. Temporary impacts would be mitigated on-site outside of the MHPA, thus requiring a 1.5:1 mitigation ratio, totaling 6.54 acres. Thus, the total mitigation requirement would be 7.32 acres.~~

MM-BIO-3: Permanent impacts to 0.78 acre of disturbed Diegan coastal sage scrub and temporary impacts to 4.36 acres of disturbed Diegan coastal sage scrub shall be mitigated at a 1:1 ratio inside the MHPA~~. Mitigation for permanent impacts shall be accomplished~~ through preservation of the MHPA-designated areas within the project site. The project site is on parcels that contain MHPA designated areas. Per the MSCP, a covenant of easement will be recorded against the property which incorporates any conditions applying to the undeveloped area, including limitation on uses and provisions for long-term management. ~~, restoration or creation; purchase of off-site habitat; or payment of fees into the City of San Diego's in-lieu fee program or an authorized mitigation bank. Temporary impacts to 4.36 acres of disturbed Diegan coastal sage scrub shall be mitigated at a 1.5:1 ratio, due to the project site's location outside of the MHPA. Mitigation for temporary impacts shall be accomplished through on-site revegetation and preservation; off-site restoration of creation; purchase of off-site habitat; or payment of fees into the City of San Diego's in-lieu fee program or an authorized mitigation bank. Impacts mitigated inside the MHPA will be mitigated at a 1:1 ratio and impacts mitigated outside the MHPA will be mitigated at a 1.5:1 ratio.~~ Prior to the issuance of any grading or improvement plans, a Mitigation

Plan shall be approved by DPR for any proposed habitat restoration, creation, and/or revegetation. The Mitigation Plan shall conform to the most current version of the County of San Diego Report Format and Content Requirements for Revegetation Plans and shall specify, at minimum, the following: (1) the location of the revegetation site; (2) an implementation plan (including site preparation, planting, and irrigation methods); (3) schedule for maintaining and monitoring the revegetation site; (4) performance criteria and standards for successful mitigation; (5) measures to protect the revegetation site; and (6) cost of implementing the Mitigation Plan.

c) **Less than Significant.** The Biological Resources Letter Report (Appendix A) included an evaluation of potential wetlands and waters under the jurisdiction of the U.S. Army Corps of Engineers under Section 404 of the Clean Water Act; the San Diego Regional Water Quality Control Board under CWA Section 401; and CDFW under California Fish and Game Code Section 1600. Southern riparian scrub, southern arroyo willow riparian woodland, coastal and valley freshwater marsh, and alkali seep associated with the Otay River and Poggi Creek were identified within the vicinity of the project site outside the project impact area. These resources are likely considered jurisdictional by USACE, CDFW, and RWQCB. However, the project would avoid direct impacts to any federal, state, or local wetlands or waters. To avoid indirect impacts, the project design incorporates a minimum 50-foot buffer from riparian habitats associated with the Otay River and Poggi Creek and a 25-foot buffer from the alkali flat. The project impact area is topographically separated from these features by slopes, as well as by a trail for portions of the Otay River and alkali flat occurring south of the site. The project also complies with the MSCP land use adjacency guidelines, which prohibits drainage into these areas which are partially protected within the MHPA. Thus, potential indirect impacts to federally or state protected wetlands and waters would be less than significant and no mitigation would be required.

d) **Less than Significant.** The Biological Resources Letter Report (Appendix A) identified the project's site location within the Otay River Valley, which is considered a regionally significant wildlife movement corridor. However, the project site consists of a primarily disturbed site up-slope of the Otay River, bounded by residential development to the north, east, and west. Due to the site's location on the periphery of the river valley adjacent to development, habitat within the project site likely provides for local wildlife movement but does not provide a throughway for wildlife movement into off-site open space areas. Therefore, the project site does not function as a significant linkage associated with the Otay River Valley regional wildlife corridor. Thus, the project is not anticipated to interfere with wildlife movement and impacts are considered less significant; no mitigation would be required.

e) **No Impact.** The proposed project would be consistent with all relevant goals and policies of the City's General Plan and MSCP regarding the preservation and protection of biological resources, which includes conservation of key sensitive species and their habitats and preservation of wetland habitats. The project design avoids impacts to areas designated as MHPA, which has been designated for preservation of key sensitive species and their habitats by the City of San Diego MSCP Subarea Plan (1997). Additionally, the project has been designed to avoid impacts to wetlands in the project vicinity.

Additionally, the project complies with the City of San Diego's MSCP (2012~~8~~8), including the Biology Guidelines and Environmentally Sensitive Lands Regulations, by avoiding impacts to wetlands and incorporating appropriate barriers from wetlands, limiting development to outside of the MHPA, incorporating noise attenuation measures for potentially occurring sensitive species (e.g. least Bell's vireo, coastal California gnatcatcher) in the MHPA during the breeding season, and avoiding encroachment onto steep slopes and coastal bluffs. The project would also be consistent with the City of San Diego MSCP Subarea Plan (1997), which is discussed in further in response IV(f) below. No impact would result due to implementation of the project.

f) **Less than Significant Impact**. The project site is located within the City of San Diego MSCP Subarea Plan (City of San Diego, 1997). The MSCP identifies land that would conserve habitat for federal and state endangered, threatened, or sensitive species, including the coastal California gnatcatcher and least Bell's vireo. The MHPA is the area within which the permanent MSCP preserve would be assembled and managed for its biological resources, and is designated for conservation and protection per the City of San Diego MSCP Subarea Plan (1997). Outside of the MHPA, "Incidental Take" of covered species and their habitats (e.g. coastal sage scrub) is authorized by the MSCP, provided that the project is consistent with the provisions of the MSCP. The project site is consistent with the MSCP as the project and the areas which will be disturbed are located outside of the MHPA boundaries and will not impact the onsite and adjacent MHPA or conflict with any provisions of the MSCP. ~~Project grading will be minimal and there will be no manufactured slopes.~~ Due to the project's sites proximity to the MHPA, the project is also required to comply with the Land Use Adjacency Guidelines from the City of San Diego MSCP Subarea Plan (1997), which requires issues related to drainage, toxic substances, lighting, noise, invasives, and barriers ~~buffers~~ be addressed during project planning.

As described in the applicable sections of this IS/MND, the proposed project would would only slightly increase impervious surfaces within the project site and loose soils areas would be stabilized with DSS carpet and/or stabilizing product. ~~Drainage would continue to be serviced by the existing storm drain system. Native hydroseed will be applied to the project to further prevent any erosion or run-off.~~Therefore, the project will not result in increased run-off, including run-off containing pesticides or toxic substances, into the MHPA.

No lighting is proposed by the project which would result in increased lighting in the MHPA. The project is not expected to substantially increase noise levels above ambient noise levels during to park operations, which is discussed in further in response XIII(a) below. Noise generated during project construction would be mitigated through **MM-BIO-2**. Invasive species would be controlled within the project site through the application of pesticides to prevent weed or plant growth, and thus would not contribute invasives to the MHPA. The project site is separated from the MHPA to the south by a steep slope, which would preclude access. The off-site trail immediately south of the project site, which is not a part of the project, abuts the MHPA but access is precluded to areas by dense vegetation and barriers (e.g. peeler pole fencing) to areas with open vegetation.

~~result in less than significant impacts related to hydrology and water quality, hazardous materials, aesthetics, and noise and vibration.~~ Impacts to biological resources would be reduced to a less than significant level with implementation of mitigation measures. Project compliance with the

Land Use Adjacency Guidelines, as described above, would ensure that impacts to the MHPA are less than significant, and the project is in compliance with the County of San Diego's MSCP Subarea Plan.

References

City of San Diego. 1997. *City of San Diego MSCP Subarea Plan.* Available at http://www.sandiego.gov/planning/programs/mscp/pdf/subareafullversion.pdf

City of San Diego, 2008. *City of San Diego General Plan.* March 10, 2008. Available at https://www.sandiego.gov/planning/genplan#genplan, accessed June 28, 2019.

City of San Diego. 2012. *San Diego Municipal Code Land Development Code – Biology Guidelines.* Last updated April 23, 2012.

Cultural Resources

Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
V.	**CULTURAL RESOURCES —** Would the project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c)	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Discussion

a) **No Impact.** Based on an analysis of records and a cultural resources survey of the property on May 7, 2019, it has been determined that there are no historical resources present within the project site; therefore, there would be no impacts on historical resources. The results of the survey are provided in the confidential Cultural Resources Assessment prepared by ESA (Appendix B).

b) **Less than Significant with Mitigation Incorporated**. A records review and cultural resources analysis was completed for the proposed project to determine the presence or potential presence of archaeological resources within the project. The results are documented in the confidential Cultural Resources Assessment (Appendix B) and summarized below.

A records and literature search was conducted at the South Coastal Information Center (SCIC) at San Diego State University on April 29, 2019 to identify previously documented resources within and near the project site. A total of 39 previously recorded cultural resources are present within a 1-mile radius, including one archaeological resource located within the northeastern corner of the project site. The pedestrian survey relocated the previously documented resource within the project site. The resource has already been heavily impacted by trail construction, maintenace, and use, and development of nearby residences. As such, project-related impacts to the surficial component of the site would not be significant. However, there is a small potential that project-related construction could impact subsurface materials. Mitigation **MM-CUL-1** would reduce impacts to a level of less than significant.

MM-CUL-1: Archaeological Monitoring. DPR, in consultation with the City of Chula Vista, shall retain a qualified archaeologist to monitor all proposed ground-disturbing activities related to the implementation of the proposed project to minimize disturbance of subsurface archaeological deposits. Specifically, the following measures shall be implemented to reduce impacts:

- All proposed ground disturbance, including grading and excavation for the project, shall be monitored by a qualified archaeologist(s) who meets the Secretary of the Interior's Professional Qualifications Standards, as promulgated in Code of Federal Regulations (CFR), Title 36, Section 61 or in the City's Land Development Code.

- Prior to the start of construction, a monitoring plan shall be prepared that describes the nature of the archaeological monitoring work, procedures to follow in the event of an unanticipated discovery, and reporting requirements.
- The archaeologist shall be invited to the preconstruction meeting to inform all personnel of the high probability of archaeological materials being encountered during construction.
- If intact subsurface deposits are identified during construction, the archaeologist shall be empowered to divert construction activities away from the find and shall be given sufficient time and compensation to investigate the find and determine its significance. No soil shall be exported off site until a determination can be made regarding the significance of the resource, especially if Native American resources are encountered.
- Recovered items shall be treated in accordance with current professional standards by being properly provenienced, cleaned, analyzed, researched, reported, and curated in a collection facility meeting the Secretary of the Interior's Standards, as promulgated in 36 CFR 79, such as the San Diego Archaeological Center. The costs for curation shall be included in the budget for recovery of the archaeological remains.

A final Cultural Resources Monitoring report shall be produced, which shall discuss the monitoring program and its results and shall provide interpretations of any recovered cultural materials.

c) **Less than Significant with Mitigation Incorporated**. As previously discussed, a records review and field survey were conducted for the proposed project to determine the presence or potential presence of cultural resources, including human remains, within the project site. The results are documented in the confidential Cultural Resources Assessment (Appendix B) and summarized below.

No previously recorded sites with human remains were identified within the project site. However, due to the number of archaeological resources recorded in the surrounding area, there is a potential for unidentified human remains to be present within the project site. If present, the human remains could be damaged by ground-disturbing activities associated with the project. Mitigation **MM-CUL-2** would reduce impacts to a level less than significant.

MM-CUL-2: Protection of Human Remains. Any ground-disturbing activities on the project site must be considered as having the potential to encounter Native American human remains. Human remains require special handling and must be treated with appropriate dignity. Specific actions must take place pursuant to State CEQA Guidelines Section 15064.5e, Public Resources Code (PRC) Section 5097.98, and Section 87.429 of the County of San Diego Grading, Clearing and Watercourses Ordinance.

Should human remains be identified during ground-disturbing activities related to the proposed project, whether during construction, maintenance, or any other activity, state- and county-mandated procedures shall be followed for the treatment and disposition of those remains, as follows.

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

1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

a. A County (DPR) and City of Chula Vista Program Manager are ~~is~~ contacted.

b. The County Coroner is contacted to determine that no investigation of the cause of death is required.

c. If the Coroner determines the remains are Native American, then:

i. The coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours.

ii. The NAHC shall identify the person or persons it believes to be most likely descended from the deceased Native American. The Most Likely Descendent (MLD) may make recommendations to the landowner (DPR), or the person responsible for the excavation work, for the treatment of human remains and any associated grave goods as provided in PRC Section 5097.98.

2. Under the following conditions, the landowner or its authorized representative shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further disturbance:

a. The NAHC is unable to identify a MLD or the MLD fails to make a recommendation within 24 hours after being notified by the NAHC.

b. The MLD fails to make a recommendation.

c. The landowner or his authorized representative rejects the recommendation of the MLD, and mediation by the NAHC fails to provide measures acceptable to the landowner.

3. Any time human remains are encountered or suspected and soil conditions are appropriate for the technique, ground penetrating radar (GPR) shall be used as part of the survey methodology. In addition, the use of canine forensics shall be considered when searching for human remains. The decision to use GPR or canine forensics shall be made on a case-by-case basis through consultation among the County Archaeologist, the proposed project archaeologist, and the Native American monitor (see MM-TCR-1).

4. Because human remains require special consideration and handling, they must be defined in a broad sense. For the purposes of this document, human remains are defined as:

a. Fragmented or disarticulated human bone with no associated artifacts or grave goods.

b. Cremations, including the soil surrounding the deposit.

c. Interments, including the soils surrounding the deposit.

d. Associated grave goods.

In consultation among the County archaeologist, City of Chula Vista, project archaeologist, and Native American monitor (see MM-TCR-1), additional measures (e.g., wet-screening of soils adjacent to the deposit or on site) may be required to determine the extent of the burial.

Energy

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
VI. ENERGY — Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion

a, b) **Less than Significant Impact**. Project construction would use small-scale construction equipment and would occur over a six-month period. Construction emissions would vary from day-to-day and would include clearing, grubbing, mass grading, rough grading, and fine grading operations, as well as installation of prefabricated bike skills features using hand tools. Energy uses would result primarily from on- and off-road vehicle fuel consumption in the form of diesel, gasoline, and electricity to power the hand tools. However, the quantities of diesel, gasoline, and electricity use during construction would be minimal given the small scale of the project. Construction diesel, gasoline, and electricity demand would be temporary and cease once construction is completed over the approximately six-month duration.

Once construction is complete, the project would not use any new energy sources as the project does not propose any new light sources or structures. As discussed in Section XVII, *Transportation*, the project would not substantially increase operational vehicle trips or VMT. As such, the project would not substantially generate increased operational energy or transportation fuel demand. The project would continue to use the same level of electricity demand for lighting, as under existing conditions, and as such, would not conflict with the local utility provider′s ability to comply with applicable state and local plans established for renewable energy and energy efficiency. For these reasons, the project would result in less than significant impacts related to energy as it would not result in a wasteful, inefficient, or unnecessary usage of direct or indirect energy.

The project would not conflict with state or local plan for renewable energy or energy efficiency. The project does not propose any new light sources or structures and thus would have no impact related to renewable energy for lighting and no impact related to The State's Title 24 building energy efficiency standards or the California Green Building Standards. Furthermore, the project would improve an already existing recreational amenity within a high-density residential neighborhood and continue to serve the existing residents without generating increased vehicle trips from outside of the community. As discussed in Section XVII, *Transportation*, the project would not substantially increase operational vehicle trips or VMT. Thus, the project would have a less than significant impact with respect to plans for minimizing vehicle miles traveled and associated transportation fuel demand.

Geology and Soils

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
VII. GEOLOGY AND SOILS — Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Discussion

a.i) **Less than Significant Impact.** The project area is not located within a State of California Alquist-Priolo Earthquake Fault Hazard Zone (California Department of Conservation, 2018; City of San Diego, 2007). The nearest potentially active fault to the project site is the La Nacion Fault, approximately 1.5 miles to the east, and the nearest active fault is the Rose Canyon Fault, approximately 6.5 miles to the west. Because the project site is not located on a known earthquake fault line or within an Alquist-Priolo Earthquake Fault Hazard Zone, the potential for ground rupture to occur during a seismic event at the project is considered to be very low. Additionally, the proposed project would not involve elements that would exacerbate the existing conditions of fault rupture hazard zones, and therefore, would not result in a cumulatively significant impact. As such, impacts related to causing loss, injury, or death due to rupture of a known earthquake fault would be less than significant.

a.ii) **Less than Significant Impact.** The site is located in the seismically active southern California region and would be subject to strong ground shaking in the event of a major seismic event. The nearest active fault is the Rose Canyon Fault located approximately 6.5 miles to the west. Due to the relatively close distance to this fault, the project site could be subject to strong ground motion and shaking resulting from seismic activity. While the project would create a new bike skills park, the project would not construct any new structures which could be substantially damaged and cause injury or death in the event of strong ground shaking. The project components would comply with all applicable seismic regulations, including the California Building Code (CBC) and Cities of San Diego and Chula Vista's Municipal Codes, which would minimize the effects of ground shaking on the project components. Furthermore, due to the nature of the project, the project would not draw a substantial amount of visitors, where visitors would use the bike skills park on a relatively short-term basis per each visit. Overall, the potential risk of injury or death as a result of strong seismic ground shaking at the project site would be minimal. Thus, impacts related to ground shaking would be considered less than significant.

a.iii) **Less than Significant Impact.** Liquefaction occurs when cohesion-less soils become liquefied when agitated by strong vibratory motion due to earthquakes. Research and historical data indicate that loose granular soils and non-plastic silts that are saturated by a relatively shallow groundwater table are susceptible to liquefaction. According to the City of San Diego's Seismic Safety Study, the Otay River Valley lies within an area designated with low potential for liquefaction (City of San Diego, 2008). Furthermore, since the proposed project would not construct any new structures intended for human occupation, the potential risk to people as a result of ground failure or liquefaction would be considered to be very low. Therefore, impacts related to liquefaction and/or ground failure would be less than significant.

a.iv) **Less than Significant Impact.** According to the Department of Conservation Relative Landslide Susceptibility and Landslide Distribution Map, the site is mapped as "marginally susceptible" to landslides (California Department of Conservation, 1995). In addition, the topography of the project site is relatively flat, with no surrounding steep slopes. As such, risk of landslides at the project site is considered to be very low, where implementation of the project would not result in a substantial adverse risk of landslides. Therefore, impacts related to landslides would be less than significant.

b) **Less than Significant Impact.** According to the U.S. Department of Agriculture's Soil Survey for San Diego County, the project site is primarily located on soils identified as gravel pits, with small portions identified as Salinas clay loam, in the northwestern and northeastern corners of the project site, and Reiff fine sandy loam, in the northwest corner of the project site (USDA, 2019). The project would include grading activities that could temporarily exacerbate erosion conditions by exposing soils during construction, which could temporarily increase the amount of sediment in runoff entering the existing storm drain system. However, the proposed project would be required to obtain and comply with the Construction General Permit from the State Water Resources Control Board (SWRCB). Stormwater best management practices (BMPs) would be required to limit erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. It is assumed that the limits of disturbance for the proposed project would require a Stormwater Pollution Prevention Plan (SWPPP). Compliance under the

Construction General Permit and SWPPP would ensure that construction activities would not degrade the surface water quality of receiving waters to levels that would be below the standards that are considered acceptable by the San Diego RWQCB or other regulatory agencies.

Once construction is complete, all exposed trails, ramps, and other dirt project components would be stabilized with DSS carpet and/or the application of soil binding products to stabilize the structure of the soil. These stabilization activities would help long-term maintenance and minimize erosion and dust. Therefore, impacts related to substantial soil erosion or the loss of topsoil would be less than significant.

c) **Less than Significant Impact.** As previously discussed above, the project site has low potential for liquefaction, landslides, and soil erosion, and impacts are considered less than significant. The project site is currently used as a recreational site, where the project would enhance the site to be a recreational area specific to bicyclists. Construction of the project would involve minimal surficial grading to create the bike skills components, where project components would be stabilized using DSS carpet or soil binding products. Implementation of the project would comply with all applicable seismic regulations, including the CBC and Cities of San Diego and Chula Vista's Municipal Codes, which would further minimize the effects of unstable soils on the project site. Thus, the potential risk to people as a result of unstable soil would be minimal and impacts would be less than significant.

d) **Less than Significant Impact.** Expansive soils are fine-grained soils (generally high-plasticity clays) that can undergo a significant increase in volume with an increase in water content and a significant decrease in volume with a decrease in water content. Changes in the water content of an expansive soil can result in severe distress to structures constructed upon the soil. According to the Soil Survey Geographic Database for San Diego County, the project site is underlain with Reiff fine sandy loam and gravel pits soils types (Conservation Biology Institute, 2019). Neither of these soil types are classified as expansive soils. In addition, all project components would comply with all applicable seismic regulations, including the CBC and Cities of San Diego and Chula Vista's Municipal Codes, which would ensure that effects from potential geologic hazards would be further minimized. For these reasons, impacts related to expansive soils would be less than significant.

e) **No Impact.** The project does not include the use of septic tanks or alternative wastewater disposal systems at the project site. Implementation of the project would not result in any impacts or changes to existing conditions regarding inadequate soils to support septic systems. Therefore, no impact would occur.

f) **No Impact.** Construction of the project includes limited surficial grading to create the bike skills features throughout the site, where no excavation or trenching activities are proposed as part of construction. Because ground-disturbing activities have no potential to reach native soils or underlying geologic formations, there is no potential to encounter unknown paleontological resources during construction. Once construction is complete, all project components would be stabilized with DSS carpet or stabilizing products, where no underground activities would occur.

Therefore, the project has no potential to damage paleontological resources and no impact would occur.

References

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Greenhouse Gas Emissions

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
VIII. GREENHOUSE GAS EMISSIONS — Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion

a, b) **Less than Significant Impact.** The State of California has developed guidelines to address the significance of climate change impacts based on Appendix G of the CEQA Guidelines, which contains two significance criteria for evaluating greenhouse gas (GHG) emissions of a project. A project would have a significant environmental impact if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The two questions were intended to satisfy the Legislative directive in Public Resources Code Section 21083.05. Therefore, the analysis contained herein relies upon Appendix G of the CEQA Guidelines as the threshold of significance for evaluating the environmental effects of GHG emissions of the proposed project. CEQA Guidelines Section 15064.4 states that the "determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project."

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

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

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

incremental effect, though individually limited, is cumulatively considerable. As discussed above, climate change is the product of incremental contributions of GHG emissions on a global scale.

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

The State CEQA Guidelines do not prescribe specific thresholds for what amount of GHG emissions would constitute a significant impact on the environment. Instead, the guidelines leave the determination of significance of GHG emissions up to the lead agency provided this decision is supported by substantial evidence. Several lead agencies have drafted or adopted varying threshold approaches and guidelines. At the local level, the City of Chula Vista has been implementing a Climate Action Plan (CAP) since 2000, with the most recent update occurring in 2017. However, this plan does not provide guidance on specific thresholds of significance. Given this information and as the lead agency, this analysis will rely on the County of San Diego's thresholds. The County of San Diego currently recommends projects be compared to a 900-metric-ton carbon dioxide equivalent ($MTCO_2e$) screening level to identify which projects require additional analysis and mitigation. Project emissions below this 900 $MTCO_2e$ level are considered less than cumulatively considerable, and project emissions above this level require additional analysis. Moreover, projects that result in a net benefit by reducing GHG emissions are determined to have a less than significant impact related to GHG emissions. Recent Court decisions, including *Newhall Ranch*, have recommended that analyses emphasize the consideration of GHG efficiency, and while the County guidance encourages CEQA analyses to focus on the GHG efficiency of a proposed project, the County also acknowledges that some projects are sufficiently small such that it is highly unlikely they would generate a level of GHGs that would be cumulatively considerable.

The project would convert an existing recreational area of the OVRP that currently contains passive walking trails to a bike skills park, where the project would not change the land use or function of the site. Project construction would use small-scale construction equipment and would occur over a six-month period. Construction emissions would vary from day-to-day and would include clearing, grubbing, mass grading, rough grading, and fine grading operations, as well as installation of prefabricated bike skills features using hand tools. Due to the limited construction equipment and duration, the amount of emissions generated during construction would be relatively minimal and would not have the potential generate a level of GHGs that would be cumulatively considerable. Construction-related GHG emissions would cease upon completion and would not contribute to long-term or on-going GHG emissions. Operation of the project would generate a similar amount of operational emissions as the site currently generates under existing conditions as the project would only change the type of recreational facility present onsite. As discussed in Section XVII, *Transportation*, the project would not substantially increase operational vehicle trips or VMT. All other operational activities would continue to occur similarly to existing conditions.

Furthermore, due to the negligible amount of GHGs generated from project construction and operation, the project would not conflict with any applicable plan, policy, or regulation related to GHGs. The project would improve an already existing recreational amenity within a high-density residential neighborhood and continue to serve the existing residents without generating increased vehicle trips from outside of the community. Therefore, the project would not substantially increase VMT and impacts related to GHGs would be less than significant.

Moreover, the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. The most applicable plan, policy, or regulation is the County's Climate Action Plan (CAP), which was adopted by the Board of Supervisors on February 14, 2018[1]. The CAP outlines actions that the County would undertake to meet its GHG emissions reduction targets. Implementation of the CAP would require new developer-initiated and County-sponsored development projects to incorporate more sustainable design standards and implement applicable reduction measures consistent with the CAP. To help plan and design projects consistent with the CAP, and to assist County staff in implementing the CAP and determining the consistency of proposed projects with the CAP during development review, the County has prepared a CAP Consistency Review Checklist (Checklist). This Checklist, in conjunction with the CAP, provides a streamlined review process for proposed discretionary developer-initiated projects that require environmental review pursuant to CEQA. Refer to the County's *Guidelines for Determining Significance for Climate Change* (Guidelines) for more information on GHG emissions, climate change impact requirements, thresholds of significance, and compliance with State CEQA Guidelines Section 15183.5.

Moreover, the proposed project is consistent with the County General Plan, as it would support development of recreational opportunities while preserving habitat within the MSCP area, and the Scoping Plan, as it would not hinder progress towards statewide reduction targets, while project emissions would decrease over the life of the proposed project as State measures are implemented.

Therefore, the proposed project's incremental contribution to cumulative GHG emissions is determined to not be cumulatively considerable because emissions are far below relevant numerical thresholds, and the proposed project is consistent with the CAP, General Plan, and Scoping Plan.

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1 In March 2018, several petitioners filed a lawsuit against the County, alleging that the CAP and, in particular, M-GHG-1 were inconsistent with General Plan Goal COS-20 and Policy COS-20.1. In December 2018, the San Diego Superior Court (Judge Timothy B. Taylor, presiding) issued a writ ordering the approval of the CAP and its EIR to be set aside, and enjoining reliance on the County CAP's mitigation measure M-GHG-1. (See Judge Taylor's Minute Order, dated December 24, 2018, at page 17.) In January 2019, the County appealed the San Diego Superior Court ruling, which stayed the above described writ issued by Judge Taylor. Given the current legal uncertainty concerning the County's CAP, the CEQA analysis prepared for the proposed project did not rely on the CAP to streamline the proposed project's environmental analysis under State CEQA Guidelines Section 15183.5. Rather, the proposed project's significance determination used the criteria contained in State CEQA Guidelines Appendix G (informed by State CEQA Guidelines Section 15064.4) and mitigation strategies (informed by State CEQA Guidelines Section 15126.4(c)) that are independent of the CAP. As such, in the event that the CAP does not withstand judicial scrutiny, the proposed project has undergone a separate, stand-alone analysis for determining whether the proposed project's GHG emissions would significantly impact the environment.

Hazards and Hazardous Materials

Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
IX.	**HAZARDS AND HAZARDOUS MATERIALS —** Would the project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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 public or the environment?	☐	☐	☐	☒
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** The project would result in construction of a bike skills park within the existing OVRP. Project construction would require the use of materials that are typically associated with construction activities, such as diesel fuels, hydraulic liquids, oils, solvents, and paints. However, the proposed project would not result in a significant hazard to the public or environment because all storage, handling, transport, emission and disposal of hazardous substances would be in full compliance with applicable regulations such as the Federal Resource Conservation and Recovery Act (RCRA), Department of Transportation (DOT) Hazardous Materials Regulations, and the local Certified Unified Program Agency (CUPA) regulations. These regulations provide tracking methods, standards and procedures for the management of hazardous materials, as well as spill response measures. Because compliance with these regulations is mandatory, construction activities are not anticipated to create a significant hazard to the public through use, transport, or disposal of hazardous materials. Any potentially hazardous materials found on site would be removed in accordance with state and federal regulations regarding the transport, use, and storage of hazardous materials. Therefore, the project

would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction.

Operation of the project would primarily not require the use of hazardous materials, with the exception of reapplying soil stabilizers on an as needed basis. The use of all soil stabilizers and other hazardous materials would be in accordance with all applicable hazardous materials regulations to ensure that all effects to humans and the environment would be minimized. Therefore, construction and operational of the project would result in less than significant impacts related to the use, transport, and disposal of hazardous materials.

b) **Less than Significant Impact.** Project construction would use typical construction materials, which would include hazardous materials. Operation of the project would primarily not require the use of hazardous materials, with the exception of reapplying soil stabilizers on an as needed basis. As discussed in the response to threshold IX.a, all storage, handling, transport, emission, and disposal of hazardous substances would be in full compliance with applicable regulations such as the RCRA, DOT Hazardous Materials Regulations, and the local CUPA regulations. These regulations address spill response measures in order to reduce potential impacts on the public or the environment due to accidental spills. The local CUPA, the DEH HMD, develops and implements risk management plans and emergency response plans containing procedures to prevent accidental releases and to appropriately respond if accidental releases occur. Therefore, due to the low quantity of hazardous materials used during construction and the compliance with Federal, State and local regulations during construction and operational phases of the project, the proposed project would result in less than significant impacts related to foreseeable upset and accidental conditions.

c) **No Impact.** There are no existing or proposed schools within a 0.25-mile radius of the project site. Therefore, implementation of the proposed project would not create any impacts associated with hazardous emissions or handling of acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. No impact would occur.

d) **No Impact.** Government Code Section 65962.5 requires the California EPA (Cal EPA) to develop an annually update the Hazardous Waste and Substances Sites (Cortese) List. A review of the DTSC EnviroStor and SWRCB GeoTracker databases did not identify any open cleanup sites or hazardous waste facilities within the project site (DTSC, 2019; SWRCB, 2019). The nearest reported case is a leaking underground storage tank (LUST) cleanup site located immediately west of the project site, at 1820 Rios Avenue. However, the LUST site is listed as case closed as of July 19, 1994 and as such does not have the potential to leak hazardous materials into the project site (SWRCB, 2019). Therefore, as the project site is not listed as an open cleanup site or hazardous waste facility, no impact would occur.

e) **No Impact.** The project site is not within 2 miles of a public or private airport or airstrip facility. The nearest airfield to the project site is Brown Field Municipal Airport, approximately 2.75 miles southeast of the project site. According to the Airport Land Use Commission's (ALUC's) Brown Field Municipal Airport Land Use Compatibility Plan (ALUCP), the project site is within the Review Area 2 of the Airport Influence Area for the Brown Field Municipal Airport. Review

Area 2 consists of locations beyond Review Area 1 but within the airspace protection and/or overflight notification areas. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2 (ALUC, 2010). The project does not propose to construct structures that could conflict with the Brown Field Municipal Airport's ALUCP. As such, the project would not conflict with an ALUCP or any other applicable rules and regulations that pertain to airports and airport safety or excessive noise. Therefore, no impact would occur with implementation of the project.

f) **Less than Significant Impact.** Implementation of the project would occur within parcels that are already in use as a recreational area within the OVRP and has been accounted for in existing emergency and evacuation plans. While construction of the project would generate additional truck and vehicle trips on surrounding roadways, this increase in trips would be temporary and would return to similar conditions as in existing conditions. Furthermore, while construction trucks travel at slower speeds than passenger vehicles, the presence of construction trucks would not interfere with normal roadway operations. Operation of the project is not anticipated to substantially increase the amount of visitors to the site, where roadway conditions would be similar to existing conditions. For these reasons, implementation of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

g) **Less than Significant Impact.** The project site is within OVRP, an established regional park, which abuts a developed urban area. According to the California Department of Forestry and Fire Protection's (CAL FIRE) Very High Fire Hazard Severity Zones (VHFHSZ) in Local Responsibility Area Map, a small portion along the eastern boundary of the project site, is located within a fire hazard severity zone (CAL FIRE, 2009). In addition, as shown in the City of San Diego Official VHFHSZ Map, there is a 300-foot brush buffer around the entire OVRP to minimize wildfire hazards (City of San Diego, 2009). The project would be constructed within the already established project site, which is currently being used as a recreational area, where implementation of the project would not increase the existing risk of wildfire at the site as the brush buffer would remain as it is in existing conditions. Furthermore, stabilization activities would include the application of pesticides to prevent weed or plant growth on the track, trail and riding feature surfaces, which would help to minimize the amount of flammable vegetation onsite. Therefore, the project would not expose people or structures directly or indirectly to a significant risk of loss, injury, or death from wildfires. Impacts would be less than significant.

References

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Hydrology and Water Quality

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
X. HYDROLOGY AND WATER QUALITY — Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** The project would result in construction of a bike skills park within an existing regional park. During construction, exposed soil could temporarily increase the amount of sediment in runoff, which would enter the existing storm drain system. The project would be required to obtain and comply with the Construction General Permit from the SWRCB. Stormwater BMPs would be required to limit erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. It is assumed that the limits of disturbance for the proposed project would require a SWPPP. Compliance under the Construction General Permit and SWPPP would ensure that construction activities would not degrade the surface water quality of receiving waters to levels that would be below the standards that are considered acceptable by the San Diego RWQCB or other regulatory agencies.

Once construction is complete, stabilizing products would be used to stabilize the dirt surfaces of the tracks, trails, and riding feature surfaces. Specifically, the stabilization activities would include installation of DSS carpet, application of pesticides to prevent weed or plant growth on the track, trail and riding feature surfaces, and application of soil binding products to stabilize the

structure of the soil. These stabilization activities would help long-term maintenance, minimize air quality impacts, and minimize erosion and dust that could potentially degrade surface or ground water quality. Installation of the DSS carpet and application of other soil stabilizing products could slightly increase the area of impervious surfaces in the project site; however, this increase would be negligible and the project is not expected to result in increased run-off. Additionally, drainage would continue to be serviced by the existing storm drain system. Therefore, impacts to surface water quality would be less than significant with project implementation.

b,e) **Less than Significant Impact.** The project would not involve pumping or use of groundwater during project construction or operation. The project site is currently a disturbed, partially vegetated park with walking trails which would be converted into a bike skills park. Installation of the DSS carpet and application of other soil stabilizing products could slightly increase the area of impervious surfaces in the project site. However, this increase would be negligible and would not substantially affect the amount of water infiltrating into the groundwater system. For these reasons, the proposed project would not 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. Therefore, the amount and quality of groundwater infiltrating into the groundwater basin with implementation of the project would be similar to existing conditions. As a result, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts related to groundwater quality would be less than significant.

c.i, ii) **Less than Significant Impact.** Construction of the proposed project would include surficial grading activities to construct the new bike skills park. These activities could temporarily alter the ground surface, consequently altering drainage patterns. Altered drainage patterns have the potential to result in erosion or sedimentation on or offsite by redirecting or concentrating flows on-site. However, as described above, the proposed project would be required to comply with the Construction General Permit and a SWPPP specific to the project site. BMPs would be implemented to minimize sedimentation at the project site. After the completion of construction, loose soils areas would be stabilized with DSS carpet and/or stabilizing products. Drainage within the project site would continue to be serviced by the surrounding existing storm drain system. Additionally, no stream or river courses run through the project site that could be affected by the proposed project. Therefore, impacts on the existing drainage pattern resulting in siltation/erosion and flooding on- or off-site would be less than significant.

c.iii) **Less than Significant Impact.** See discussion under Issue X (c)(i, ii) above. Construction of the proposed project would not result in significant impacts on the existing drainage pattern due to implementation of BMPs that would minimize flooding and runoff. After the completion of construction, loose soils areas would be stabilized with DSS carpet and/or stabilizing products. Drainage for the site would continue to be serviced by the existing storm drain system. Therefore, impacts related to runoff exceeding the drainage system capacity would be less than significant.

c.iv) **Less than Significant Impact.** According to the Federal Emergency Management Agency's (FEMA's) Flood Insurance Rate Map the project site is not within the 100-year floodplain; however, the Otay River corridor and tributary to the west of the project are classified as special flood hazard areas subject to inundation by the 1 percent annual chance of flood (FEMA, 2012). As the project site remains entirely out of the areas designated as special flood hazard areas, there would be a low potential for flood hazards onsite. Furthermore, because the project site is not located within a flood zone and does not proposed to construct large structures onsite, the project would not redirect or impede flood flows (FEMA, 2012). For these reasons, impacts would be less than significant.

d) **Less than Significant Impact.** The project site is located approximately 5.5 miles east of the Pacific Ocean. According to the Tsunami Inundation Map, the project site is not in an USGS Quadrangle that would be at risk of tsunami inundation (CDOC, 2017). In addition, the project site is not located near a body of water, and therefore not at risk by seiche. According to FEMA's Flood Insurance Rate Map the project site is not within the 100-year floodplain; however, the Otay River corridor and tributary to the west of the project are classified as special flood hazard areas subject to inundation by the 1 percent annual chance of flood (FEMA, 2012). As the project site remains entirely out of the areas designated as special flood hazard areas, there would be a low potential for flood hazards onsite. Thus, impacts related to increased risks from seiche, tsunami, or flood hazards with project implementation would be less than significant.

References

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Land Use and Planning

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XI. LAND USE AND PLANNING — Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Discussion

a) **No Impact.** The proposed project does not propose the introduction of new infrastructure such as major roadways or water supply systems, or utilities to the area The proposed project would construct a bike skills park on 3.2–acres within the OVRP, which is already being used as a recreational area. Because the project would be developed upon parcels already established in the OVRP and within the surrounding community, project implementation has no potential to divide an established community. No impact would occur.

b) **Less than Significant Impact.** The proposed project is located in the OVRP, which is a multijurisdictional park managed by the County of San Diego, the City of Chula Vista, and the City of San Diego. In 1990, the three jurisdictions entered in a Joint Exercise of Power Agreement to coordinate planning, acquisition, and design of the OVRP. The project site is under the City of San Diego jurisdiction but the City of Chula Vista would manage the project.

The project site is specifically located within the City of San Diego's Otay Mesa-Nestor Community Plan Area and is zoned AR-1-1 (Agricultural-Residential) and OF-1-1 (Open Space-Floodplain) (City of San Diego, 2008). The project site is also located within the City of Chula Vista General Plan, City of San Diego MSCP Subarea Plan, City of Chula Vista Greenbelt Master Plan, City of Chula Vista Parks and Recreation Master Plan, and the OVRP Concept Plan and Trail Guidelines. The project's consistency with these plans is described below.

City of San Diego General Plan

As stated above, the project site is specifically located within the City of San Diego's Otay Mesa-Nestor Community Plan boundaries and is designated Open Space/Low Density Residential. Furthermore, the project site is zoned AR-1-1 (Agricultural-Residential) and OF-1-1 (Open Space-Floodplain), and the AR-1-1 zone permits active and passive recreation uses. The City of San Diego's Otay Mesa-Nestor Community Plan identifies the OVRP as containing outstanding scenic, natural and cultural resources and recreational opportunities as a resource-based park. OVRP will link San Diego Bay to the Otay Lakes with a continuous east-west wildlife corridor and multipurpose trail system, will offer residents and visitors outstanding natural scenic and cultural features, and provide community and regional recreational and educational opportunities. The Otay Mesa-Nestor Community Plan also provides strategies for enhancing and preserving the resources within OVRP, which include protecting and preserving environmentally sensitive areas, restoring degraded habitat, and providing active and passive recreational opportunities. The

project does not propose to alter the existing use or zoning of the project site and would continue to operate as a recreational facility within the OVRP, even though the type of recreational use would be changed. Further, the proposed project would support the vision and strategies discussed in the Otay Mesa-Nestor Community Plan, providing additional active recreational opportunities and restoring environmentally sensitive habitat. Therefore, the project would remain consistent with the City of San Diego's General Plan.

City of Chula Vista General Plan

While the project site is under the City of San Diego jurisdiction, the City of Chula Vista would manage the project. According to the City of Chula Vista's General Plan, the project site designation is Open Space with a Future Neighborhood Park overlay ~~Preserve~~, which is intended for areas included as part of the City of Chula Vista MSCP Subarea Plan for the permanent conservation of biological resources (City of Chula Vista, 2005). Implementation of the proposed project maintains the existing use of the OVRP and would maintain the biological resources currently present onsite, either through avoidance during construction or restoration activities. Therefore, the project would be consistent with the Open Space with a Future Neighborhood Park overlay ~~Preserve~~ designation as established by the General Plan.

City of San Diego MSCP Subarea Plan

The City of San Diego MSCP Subarea Plan is designed to identify lands that would conserve habitat for federal and state endangered, threatened, or sensitive species (City of San Diego, 1997). As discussed in the ~~Biolgoical~~ Biological Resources section of this IS/MND, the proposed project will be located on a portion of three lots. The project site where construction will occur is located entirely outside the boundaries of the designated MHPA on the three lots. MHPA is designated for conservation and protection per the City of San Diego MSCP Subarea Plan (1997). The MSCP Subarea Plan identifies several issues that need to be addressed during the planning of a project to avoid negative impacts of development on adjacent open space preserve areas in the MHPA (City of San Diego, 1997), including drainage, toxic substances, lighting, noise, invasives, and barriers. As described in the applicable sections of this IS/MND, the proposed project would result in less than significant impacts related to hydrology and water quality, hazardous materials, aesthetics, and noise and vibration. Impacts to biological resources would be reduced to a less than significant level with implementation of mitigation measures. Therefore, with mitigation incorporated, the project would be consistent with the City of San Diego MSCP Subarea Plan.

Otay River Watershed Management Plan

The Otay River Watershed Management Plan (ORWMP) is a multi-jurisdictional comprehensive plan to address land use changes and water protection in the Otay River Watershed. The intent is to protect the beneficial uses within the watershed and the San Diego Bay that receives water from this watershed (City of Chula Vista, et al. 2006). The proposed project is located in the Otay River Watershed. Proposed construction activities would be conducted in accordance with the Construction General Permit and the SWPPP prepared for the project, which would protect watershed resources in accordance the ORWMP. Therefore, the project would be consistent with the ORWMP.

City of Chula Vista Greenbelt Master Plan

The City of Chula Vista's Greenbelt Master Plan provides guidance and continuity for planning open space and constructing and maintaining trails that encircle the city (City of Chula Vista, 2003b). This includes the Chula Vista Bayfront, the Sweetwater River corridor, Otay Lakes, and the Otay River Valley. The plan's primary purpose is to provide goals and policies, trail design standards, and implementation tools that guide the creation of the Greenbelt system. The project site is identified as a potential active recreation area within the greenbelt, and a future trail is identified in the vicinity of the project to the north of the Otay River. The project would establish an active recreation area, which is consistent with this plan. The project would also not preclude the development of a trail to the north of the river. Thus, the project is consistent with the Greenbelt Master Plan.

City of Chula Vista Parks and Recreation Master Plan

The Parks & Recreation Master Plan is the guiding document for the City of Chula Vista's parks and recreation system. It represents the City's commitment to comprehensively respond to the park and recreation facility demands of the current and future residents and serves as the blueprint for future park development (City of Chula Vista 2018). As stated above, the project site designation is Open Space with a Future Neighborhood Park overlay. The Parks and Recreation Master Plan defines Neighborhood Parks as intended to serve local residents, range in size from 5 to 15 acres and include open play space, playing fields, play equipment and picnic areas. Neighborhood parks typically do not include community centers. These parks, when developed in accordance with city standards, are eligible for public park credit. The proposed project would construct a 3.2-acre bike skills park, which includes various areas dedicated to different bike skills facilities. The skill areas include Kids Park, Pump Track, Jump Park, Skills Trail, and Access Trails and Roads. Thus, while the proposed project is 1.8 acres smaller than a typical Neighborhood Park, it is intended to serve the surrounding neighborhoods and provides play equipment, therefore would be consistent with the Parks and Recreation Master Plan.

Otay Valley Regional Park Concept Plan and Trails Guidelines

The OVRP planning was initiated in 1990 and is a joint planning effort between County of San Diego and the Cities of Chula Vista and San Diego. The most recent version of the Concept Plan was accepted by the Otay Valley Regional Park Policy Committee on July 28. 2016. The park area covers approximately 11 miles of the Otay River corridor from the salt ponds near the Pacific Ocean inland to the Lower and Upper Otay Reservoirs. This corridor includes important biological, cultural, and hydrologic resources. In addition, the jurisdictions recognized the recreational value potential and have planned for trails, overlooks, staging areas, and interpretive centers along the corridor. The Concept Plan is split into five segments, and the project is located in the Interstate 5 to Interstate 805 segment. The site is identified as Recreation Area in the OVRP Concept Plan. The project proposes to construct a bike skill park, which would provide additional recreation opportunities and is consistent with the OVRP Conceptual Plan's recommended usage. Thus, the project is consistent with the OVRP Conceptual Plan.

The OVRP planning efforts also include Trail Guidelines (County of San Diego, et al 2003) and Design Standards & Guidelines (County of San Diego, 2005), which were incorporated in the

development of the project's concept plan (Figure 3). Thus, the project would not conflict with these planning documents.

In summary, the proposed project would not conflict with any applicable land use plan, policy, or regulation, and impacts would be less than significant.

References

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Mineral Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XII. MINERAL RESOURCES — Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** Implementation of the proposed project would not result in the loss of availability of a known mineral resource. Valuable mineral resources to the region, state, and City of Chula Vista include sand, gravel, and crushed rock resources. According to the City of San Diego's General Plan Conservation Element, the proposed project is classified as Mineral Resource Zone (MRZ-) 2 (City of San Diego, 2008). Lands classified as MRZ-2 are considered areas where adequate information indicates that significant mineral deposits are present or where it is judged that there is a high likelihood for their presence, and the location of San Diego's high quality mineral resource areas (City of San Diego, 2007). The Otay River Valley is known to contain significant deposits of construction quality sand reserves. However, the proposed project's location within the OVRP would likely impede any application for mining actives in the proposed project area. In addition, the site is located adjacent to residences, the Otay River, and significant biological resources and is not zoned or designated for mining operations. Per the City of Chula Vista's General Plan, no mining is envisioned to occur at all within the Chula Vista MSCP Preserve (City of Chula Vista, 2005). Thus, the proposed project would not 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. Impacts would be less than significant.

b) **Less than Significant Impact.** As discussed above under response XII(a), while the site is mapped as MRZ-2, the site is not available for mining operations. In addition, the project does not propose any physical structures that would preclude future mining. Thus, the proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan, and impacts would be less than significant.

References

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Noise

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XIII. NOISE — Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion

a) **Less than Significant Impact.** The project site area is surrounded by residential, recreational, open space conservation, public agency lands, and vacant/undeveloped land. I-805 is located approximately 620 feet to the east of the project site. In these types of settings, traffic noise is the primary contributor to ambient noise, although there may be other periodic contributors to noise such as maintenance trucks traveling in the area, lawnmowers, barking dogs, and other existing noise sources common to residential and open space areas. According to the Federal Highway Administration (FHWA), highway traffic noise levels typically range from 70 to 80 dBA at a distance of 50 feet from the highway (FHWA 2003). At a distance of 620 feet, the noise level would attenuate to a range of 48 to 58 dBA, based on an attenuation rate of 6 dBA per doubling of distance. Thus, the existing ambient noise environment is approximately 50 to 60 dBA. The ambient noise levels would be higher as one moves closer towards I-805.

The County of San Diego Municipal Code (CSDMC) (County 2017) establishes prohibitions for disturbing, excessive, or offensive noise, and provisions such as sound level limits for the purpose of securing and promoting the public health, comfort, safety, peace, and quiet for its citizens (Chapter 4, Noise Abatement and Control).

Section 36.408 of the CSDMC prohibits construction between the hours of 7:00 P.M. and 7:00 A.M. Monday through Saturday, and at any time on Sunday or a holiday (i.e., construction is allowed Monday through Friday between 7:00 A.M. to 9:00 P.M.; and Saturdays and National Holidays between 8:00 A.M. to 6:00 P.M.).

Section 36.409 of the CSDMC sets a maximum noise level for construction equipment of 75 dBA for an eight-hour period, between 7:00 A.M. and 7:00 P.M., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received.

Project construction would generate noise from the daytime operation of construction equipment on the project site and from haul truck trips on local roadways accessing and departing the project site. Project construction would use small-scale construction equipment over a six-month period, where construction activities would vary from day-to-day and include clearing, grubbing, mass grading, rough grading, and fine grading operations, as well as installation of prefabricated bike skills features using hand tools. The construction activities associated with the surficial grading would have the greatest potential to generate noise during construction; however, these activities would be conducted using small-scale construction equipment and would not occur continuously over the six-month construction period.

According to the FHWA Roadway Construction Noise Model, which is based on a survey of heavy-duty construction equipment used for large scale projects, reference construction equipment noise levels for equipment such as an excavator, dump truck, forklift, and tractor/loader/backhoe range from an average of 69 to 77 dBA Leq at a distance of 50 feet from the equipment, taking into account equipment usage factors. Since this project is not a large-scale project and would use small-scale construction equipment, actual equipment noise levels would be less than the values listed above.

Due to the use of small-scale construction equipment, the amount of noise generated during construction would be minimal and would dissipate as distance from the activity increased when construction equipment was located further away from the site boundaries. Therefore, while limited amounts noise might be perceivable at the residences that are directly adjacent to the site during certain construction activities, those construction activities would occur on an interval basis and would be intermittent throughout the day depending on the type of construction activity and distance from the site boundary. In addition, the following BMPs would occur during construction: the contractor would be required to ensure construction equipment would be properly installed with functioning noise muffler systems; the contractor would ensure equipment is operated and maintained in accordance with manufacturer specifications; and the contractor would stage noise-generating equipment away from noise-sensitive receptors. The BMPs would ensure that construction noise levels do not conflict with Section 36.409 of the CSDMC sets a maximum noise level for construction equipment of 75 dBA for an eight-hour period, between 7:00 A.M. and 7:00 P.M., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received. Noise generated by the project would not be substantial enough to exceed any applicable construction noise threshold.

Once construction is completed, the project would operate similar to existing conditions, where noise levels at the project site would not substantially increase with project implementation. Operation of the project would result in recreational activities but would not include any motorized or stationary mechanical equipment sources of noise. The project would be open from sunrise to sunset; therefore, the project would not generate any operational noise during sensitive nighttime hours. As a result, operation of the project would not substantially alter the existing noise environment, which is dominated by traffic noise and other periodic contributors to noise such as maintenance trucks traveling in the area, lawnmowers, barking dogs, and other existing noise sources common to residential and open space areas.

The project site area is surrounded by residential, recreational, open space conservation, public agency lands, and vacant/undeveloped land. As discussed above, based on I-805 traffic noise, the existing ambient noise environment in the project site area is approximately 50 to 60 dBA, which the higher range occurring during active daytime hours and the lower range occurring during less active nighttime hours. The project would result in the development of daytime use access trails that would be as close as 52 feet to the nearest residences. However, people who would utilize the bike skills park would ride through the access trails in a relatively quiet mode, with conversation expected at a normal voice level of approximately 60 dBA measured at a distance of 3 feet. At a distance of 60 feet, the voice level would be reduced by 26 dBA, to a level of 34 dBA at the nearest residence. This anticipated voice levels would be below the daytime ambient noise levels of approximately 60 dBA in the residential neighborhood.

In addition, the Project would have 5 skill trails with distances of approximately 89 feet (Skill Trail 1), 144 feet (Skill Trail 2), 52 feet (Skill Trail 3), 132 feet (Skill Trail 4), and 80 feet (Skill Trail 5) from the closest point to the nearest residences to the north. The skill trails would be used during daytime hours and users of the skill trails could reasonably be expected to converse with elevated voices potentially resulting in elevated noise levels in the project site area. The noise level from users of the skill trails is based on a reasonably conservative estimate of a maximum of 10 bikers using the same skill trail at any one time, and 8 people with loud voices with a noise level of 72 dBA at 3 feet for each person and 2 people shouting with a noise level of 78 dBA at 3 feet each person. Although the skill trails are spread throughout the project site with the majority of the trails located at distances greater than the nearest distances stated above (i.e., the majority of Skill Trails 1, 2, 3, 4, and 5 are located at distances greater than 89, 144, 52, 132, and 80 feet, respectively), the voice levels are evaluated assuming all persons are located at the shortest distances for each skill trail to provide a conservative analysis. Given that noise is measured based on a logarithmic decibel scale, each doubling of the sound with equal strength equals a 3 dBA increase. Therefore, 2 people with loud voices each with a noise level of 72 dBA at 3 feet combines to yield 75 dBA at 3 feet. Four people with loud voices combines to yield 78 dBA at 3 feet. Eight people with loud voices combines to yield 81 dBA at 3 feet. Similarly, two people shouting each with a noise level of 78 dBA at 3 feet combines to yield 81 dBA at 3 feet. For these 10 people, the combined noise level would be 84 dBA at 3 feet, based on the conservative assumption that all 10 people are in the same location and not spread throughout the project site. Skill Trail 3 is the closest to the residences to the north. At a distance of 52 feet on Skill Trail 3, the noise level would be reduced by 25 dBA compared to the noise level at 3 feet. Therefore, on Skill Trail 3, the 10 people combined would result in a noise level of 59 dBA at the residences 52 feet to the north. On Skill Trail 5, at a distance of 80 feet, the noise level would be reduced by 29 dBA compared to the noise level at 3 feet. Therefore, the 10 people combined would result in a noise level of 55 dBA at the residences 80 feet to the north. On Skill Trail 1, at a distance of 89 feet, the noise level would be reduced by 29 dBA compared to the noise level at 3 feet. Therefore, the 10 people combined would result in a noise level of 55 dBA at the residences 89 feet to the north. On Skill Trail 4, at a distance of 132 feet, the noise level would be reduced by 33 dBA compared to the noise level at 3 feet. Therefore, the 10 people combined would result in a noise level of 51 dBA at the residences to the north. On Skill Trail 1, at 144 feet, the noise would be reduced by 34 dBA, and the resulting noise level would be 50 dBA at the residences to the north. Under a reasonably maximum case scenario of 50 people using the bike skills park at the same

time, 10 people at each skill trail, of which 8 people talk with loud voices (or 40 people throughout the park) and 2 people shouting (or 10 people throughout the park), the combined noise levels at the nearest residences to the north would be approximately 62 dBA (i.e., 59 dBA + 55 dBA + 55 dBA + 51 dBA + 50 dBA = 62 dBA). The estimated noise level of 62 dBA at the nearest residences to the north would be compatible with the daytime ambient noise levels of approximately 60 dBA without the use of the proposed bike skills park. While it may be possible to occasionally hear people using the bike skills park, the potential increase in ambient noise level under the above worst case assumption scenario would not increase the ambient noise level by more than 3 dBA, which is not a discernable difference in the noise level from existing sources of noise in the project site area. Therefore, operational noise at the proposed Bike Skills Park would be less than significant.

Therefore, impacts related to an increase in noise temporarily or permanently would be less than significant.

b) **Less than Significant Impact**. The proposed project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.
2. Residences and buildings where people normally sleep including hotels, hospitals, residences and where low ambient vibration is preferred.
3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

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

Typically, heavy-duty construction equipment used for demolition, earth-moving, and compaction for paving would generate localized vibration levels, which, depending upon distance, could potentially affect structures or annoy people. Similar to noise levels, vibration levels diminish with increasing distance away from the source (FTA, 2018). Project construction would use small-scale construction equipment over a six-month period, where construction activities would vary from day-to-day and include clearing, grubbing, mass grading, rough grading, and fine grading operations, as well as installation of prefabricated bike skills features using hand tools.

All grading activities would be surficial. Due to the use of small-scale construction equipment, the amount of vibration generated during construction would be minimal and would dissipate as distance from the activity increased. Therefore, while limited amounts vibration might be perceivable at the residences that are directly adjacent to the site during certain construction activities occurring at the closest boundary of the project site, those construction activities would

occur on a short-term basis and would be intermittent throughout the day depending on the distance from the site boundary. Construction equipment tend to move through a construction site area during a construction workday; therefore, construction vibrations would typically not be concentrated at a single location. Vibration generated by the project would not be substantial enough to exceed applicable significance thresholds and would not cause structural damage due to the small construction equipment proposed for project construction.

Once construction is completed, the project would have no potential to generate vibration during operation as the project would not introduce new sources of vibration to the project site relative to existing conditions. Operation of the project would not include any motorized or stationary mechanical equipment sources of vibration. Therefore, impacts related to vibration would be less than significant.

c) **No Impact.** The project site is not within 2 miles of a public or private airport or airstrip facility. The nearest airfield to the project site is Brown Field Municipal Airport, approximately 2.75 miles southeast of the project site. According to the Brown Field Municipal ALUCP, the project site is within the Review Area 2 of the Airport Influence Area for the Brown Field Municipal Airport. Review Area 2 consists of locations beyond Review Area 1 but within the airspace protection and/or overflight notification areas. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2 (ALUC, 2010). The project does not propose to construct structures that could conflict with the Brown Field Municipal Airport's ALUCP. As such, the project would not conflict with an ALUCP or any other applicable rules and regulations that pertain to airports and excessive noise. Therefore, no impact would occur with implementation of the project.

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Population and Housing

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XIV. POPULATION AND HOUSING — Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

a, b) **No Impact.** The project proposes to construct a bike skills park within the existing OVRP. No residential or commercial development is proposed as part of the project; therefore, substantial unplanned population growth would not occur. Furthermore, the proposed project would not displace people or housing necessitating the construction of additional housing elsewhere. No impact would occur.

Public Services

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XV. PUBLIC SERVICES —				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

Discussion

a.i) **Less than Significant Impact.** The proposed project would construct a bike skills park on existing parcels within the OVRP, which are currently being used as a recreational area. Fire protection service needs would remain similar to existing conditions with the implementation of the project; therefore, impacts would be less than significant.

a.ii) **Less than Significant Impact.** The proposed project would construct a bike skills park on existing parcels within the OVRP, which are currently being used as a recreational area. Police protection service needs would remain similar to the existing conditions with the implementation of the project; therefore, impacts would be less than significant.

a.iii) **No Impact.** As discussed in Section XIV, *Population and Housing*, the proposed project would not induce population growth, either directly or indirectly, in the project area. Since the project would not have the potential to cause population growth, the project would also have no potential to affect local school services or capacities. Therefore, no impact would occur.

a.iv) **No Impact.** The project proposes to construct a bike skill park on existing parcels within the OVRP, which are currently being used as a recreational area. Project implementation would convert an existing recreational area with walking trails into a new bike skills park, and would not expand the OVRP acreage. Moreover, since the project would not generate population growth, the project would not necessitate the need for additional parkland within the area. Therefore, no impact would occur.

a.v) **No Impact.** As discussed above, the project proposes to construct a bike skills park on existing parcels within the OVRP, and does not propose the construction of housing or commercial structures that could result in an increase to the local population. Therefore, the proposed project would not result in an increased demand requiring the need for new or physically altered public facilities. No impact would occur.

Recreation

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XVI. RECREATION —				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** The project proposes to construct a new bike skills park in an existing recreational area within the OVRP. The project would create a new bike skills park where recreational users looking for bicycle-specific equipment and facilities would use this park in place of other local and regional parks that don't include bicycle-specific equipment or facilities. Because bicyclists would use this new recreational facility for bicycle-specific activities, the project would help to alleviate the use and deterioration of other parks which lack dedicated bicycle facilities but are still used for these types of bicycle-related activities. Moreover, the project does not have the potential to induce population growth, either directly or indirectly, and as such would not require additional parkland or parks be provided in the community. Therefore, because the project is adding a recreational facility specific to bicyclists, the project would be a benefit in the community and would not cause the physical deterioration of existing parks or other recreational facilities. Impacts would be less than significant.

b) **Less than Significant Impact.** The project proposes to construct a new bike skills park in an existing recreational area within the OVRP. As such, the proposed construction impacts have been considered throughout the discussion of environmental impacts in this document. As discussed in Section I through Section XXI all potential impacts would either be less than significant or reduced to a less than significant level with implementation of mitigation measures MM-BIO-1, MM-BIO-2, MM-BIO-3, MM-CUL-1, MM-CUL-2, and MM-TCR-1. The proposed project would provide an additional recreational facility in the region, which would reduce overall demand on the existing regional parks and facilities, thereby reducing deterioration of existing regional facilities. Therefore, the proposed project would result in a less-than-significant impact due to the construction of recreational facilities. Therefore, the proposed project would be less than significant with mitigation incorporated.

Transportation

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XVII. TRANSPORTATION — Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** Construction of the project is anticipated to occur over a six-month period and is expected to be complete by Fall 2020. Construction activities would consist of clearing, grubbing, mass grading, rough grading, and fine grading operations, where all grading activities would be surficial. Construction of the proposed project has the potential to affect the transportation system through the hauling of soil, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the project site. Construction trucks and vehicles would use the regional circulation system, including Interstate (I-) 5 and I-805, as well as the local circulation system, including Rancho Drive and Rios Avenue.

Construction of the program components would add temporary construction-related traffic to nearby roadways over the course of construction of the proposed project. While construction of the project would temporarily generate additional truck and vehicle trips on the regional and local circulation systems, traffic levels would not substantially increase and would be temporary in nature as traffic levels would return to pre-construction conditions once construction is complete. Moreover, due to typical construction start and finish times, construction trips would occur outside peak traffic periods and would, therefore, not contribute to delays currently experienced by vehicles traveling through the local and regional circulation systems. Additionally, delivery and hauling of construction materials to and from the project site would be scheduled outside of peak hours to the greatest extent feasible to reduce the effects to the local and regional circulation systems.

To further decrease effects to existing traffic operations, construction trucks accessing the program area would use designated truck routes to the extent feasible, which would keep heavy trucks moving at slower speeds along roadways that have been designed to accommodate these types of vehicles. While local drivers could experience increased travel times if they were traveling behind a heavy truck due to slower movement and turning radii compared to passenger vehicles, these delays would be intermittent throughout the day, where the majority of these trips would occur outside peak hours, and would cease once construction activities are completed. All

construction trucks traveling on Caltrans facilities would be required to comply with California Vehicle Code, division 15, chapters 1 through 5 (Size, Weight, and Load) and California Street and Highway Code Sections 660-711, as applicable, to minimize impacts to roadway operations. No roadway closures are expected to be required during construction of the project.

Once constructed is complete, the new bike skills park would be open year-round from sunrise to sunset, which is the same as in existing conditions. Park users may access the new facility via Rancho Drive and existing OVRP trails from the east or from Rios Avenue/the Rios Staging Area and existing OVRP trails from the west. Since the project site is already being used as a recreational area where the project would convert the type of recreational use onsite, operational traffic is anticipated to be similar to existing conditions. Moreover, the new bike skills park is intended to serve the surrounding community, which is reflected in the scale of the project, and as such, is not anticipated to draw a substantial number of new park users to the site, which would substantially increase operational trips. Furthermore, no new parking areas are anticipated as part of the project and therefore, the project in not intended to increase the amount of park users visiting the site from existing conditions.

In addition, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian or bicycle facilities. Therefore, the project would not conflict with any policies establishing measures of the effectiveness for the performance of the circulation system and impacts would be less than significant.

b) **Less than Significant Impact.** In accordance with Senate Bill (SB) 743, the new CEQA Guidelines section 15064.3, subdivision (b) was adopted in December 2018 by the California Natural Resources Agency. These revisions to the CEQA Guidelines criteria for determining the significance of transportation impacts are primarily focused on projects within transit priority areas, and shifts the focus from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of a mix of land uses. VMT is a measure of the total number of miles driven to or from a development and is sometimes expressed as an average per trip or per person.

The newly adopted guidance provides that a lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide. The City and County of San Diego are currently engaged in this process and have not yet formally adopted updated transportation significance thresholds or updated transportation impact analysis procedures. While the regulations of SB 743 have not been finalized or adopted by the City or County of San Diego, a qualitative VMT analysis is presented in this IS/MND for informational purposes. The project would attract park users primarily from the surrounding community, which would result in low vehicle miles traveled to get to and from the project site. While some park users could travel from greater distances to use the new bike skills park, this type of park user is expected to visit the project site on a more occasional basis compared to local park users, where the VMT implications would be minimal. As such, the project is anticipated to result in a less than significant impact with respect to VMT.

c) **No Impact.** The project does not propose any improvements or changes to existing roadways and would be access via existing driveways. In addition, the project would not introduce an incompatible use, such as farm equipment, onto the surrounding local circulation system, which could cause a roadway hazard. The project would not result in a new or increase an existing roadway hazard through a design feature or incompatible use. Therefore, no impact would occur.

d) **Less than Significant Impact.** As stated in Section IX(f), the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Implementation of the project would occur on parcels that are already in use as a recreational area within the OVRP and has been accounted for in existing emergency and evacuation plans. While construction of the project would generate additional truck and vehicle trips on surrounding roadways, this increase in trips would be temporary and would return to similar conditions as in existing conditions. Furthermore, while construction trucks travel at slower speeds than passenger vehicles, the presence of construction trucks would not interfere with normal roadway operations. Operation of the project is not anticipated to substantially increase the amount of visitors to the site, where roadway conditions would be similar to existing conditions. For these reasons, implementation of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Tribal Cultural Resources

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

Discussion

a.i, a.ii) **Less than Significant Impact with Mitigation Incorporated**. Pursuant to AB 52, California Native American tribes that are traditionally and culturally affiliated with the area can request notification of projects in their traditional cultural territory. Consultation was initiated with culturally affiliated tribes on July 19. Jamul Indian Village, Iipay Nation of Santa Ysabel, and Viejas Band of Kumeyaay Indians requested formal consultation, indicating the project area has cultural significance to their tribes. Due to tribal requests, as well as the cultural sensitivity of the project area as identified in the confidential Cultural Resources Assessment (Appendix B), Native American monitoring would be required during all ground disturbing activities. Measure **MM-TCR-1** would reduce impacts to less than significant.

MM-TCR-1: Native American Monitoring. DPR, in consultation with the City of Chula Vista, shall retain a Kumeyaay monitor affiliated with one of the interested tribal group (e.g. Jamul Indian Village, Iipay Nation of Santa Ysabel), as determined during AB 52 tribal consultation, to monitor all project-related ground disturbance. The Native American monitor shall work in concert with the archaeological monitor, as outlined in MM-CUL-1, and shall be consulted in the event of inadvertent discoveries of prehistoric archaeological resources.

Utilities and Service Systems

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XIX. UTILITIES AND SERVICE SYSTEMS — Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Discussion

a) **No Impact.** The project does not propose to construct any structures that would require water, wastewater, electrical power, natural gas, or telecommunication facilities. As such, implementation of the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. Therefore, no impact would occur.

b) **Less than Significant Impact.** The project site currently functions as a passive recreational area within the OVRP and does not include any irrigation or water features at this time. Implementation of the project would not change the land use or the function of the site but would rather convert the type of recreational facility located onsite. Construction of the project would use a water truck for dust control but no long-term water infrastructure, such as irrigation or water fountains, would be installed.

After grading and installation of park features, the project proposes to restore 5,000 square feet of disturbed area back to native vegetation as mitigation for significant impacts to biological resources. To support the revegetation activities, temporary irrigation/supplemental watering supplies, which could be either through a water truck or temporary above-ground irrigation system, would be used onsite. Since the site would be revegetated with native plants, the supplemental water source would only be used to supplement dry periods during the initial establishment period, usually during the first three years after replanting. Once the plants have become established and the habitat determined to be self-sustaining, no further irrigation would

be necessary so it would be removed. Therefore, the amount of water proposed to be used during revegetation would be relatively small and would not exceed available water supplies.

Other anticipated maintenance for the project includes refreshes that would be isolated to the pump track area. The refresh would occur under the maintenance and operations of this facility, which is managed by City of Chula Vista. Other maintenance includes general trail maintenance as needed and maintenance of dirt features on an as-needed basis. Water use during operations and maintenance of the project would not be required as the DSS carpet and stabilizing products would be used for trail maintenance, if needed. For these reasons above, the water use during the restoration period of the project would be able to be accommodated by existing water supplies and would not substantially increase water demand in the area. Therefore, impacts related to exceeding water supplies would be less than significant.

c) **No Impact.** The proposed project would not include any facilities that would generate wastewater and, as such, implementation of the project would not cause the applicable wastewater treatment plant to exceed its service capacity. Therefore, no project impacts related to wastewater treatment requirements would occur.

d, e) **Less than Significant Impact.** The proposed project would generate green waste during the construction phase, which would be composted at a local landfill. Once construction is complete, the new bike skills park would serve the surrounding community as a new recreational facility, where solid waste generation would be minimal as the amount of park users is anticipated to be similar to existing conditions. In addition, the project site is within the OVRP and contains established waste receptacles currently being maintained by the City of Chula Vista, which would continue with project implementation. Furthermore, the project would dispose of solid waste in accordance with all applicable federal, state, and local regulations related to solid waste. Because the project is expected to generate minimal solid waste and would comply with all applicable regulations, the proposed project would have a less than significant impact related to solid waste.

Wildfire

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XX. WILDFIRE — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** As stated in Section IX(f), the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Implementation of the project would occur on parcels that are already in use as a recreational area within the OVRP and has been accounted for in existing emergency and evacuation plans. While construction of the project would generate additional truck and vehicle trips on surrounding roadways, the increase in trips would be temporary and would return to similar conditions as in existing conditions after construction is complete. Furthermore, while construction trucks travel at slower speeds than passenger vehicles, the presence of construction trucks would not interfere with normal roadway operations. Operation of the project is not anticipated to substantially increase the amount of visitors to the site, where roadway conditions would be similar to existing conditions. For these reasons, implementation of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

b) **Less than Significant Impact.** As detailed above in Section IX (g), a small portion along the eastern boundary of the project site, is located within a very high fire hazard severity zone.~~, and the project site is required to maintain the 300-foot brush buffer that has been established around the entire OVRP.~~ The project would be constructed within the already established project site, which is currently being used as a recreational area, where implementation of the project would not increase the existing risk of wildfire at the site as the proposed project would not preclude maintenance of the adjacent building's brush management zone, and ~~brush buffer~~ would ~~remain as it is in~~ be an improvement from existing conditions due to operational weed control activities that would reduce the amount of fuels on-sites.~~.~~ Stabilization activities would include the application of pesticides to prevent weed or plant growth on the track, trail and riding feature surfaces, which would help to minimize the amount of flammable vegetation onsite. Furthermore,

the project would not exacerbate wildfire risks, and would not expose people to pollutant concentrations for a wildfire or the spread of a wildfire. Therefore, impacts would be less than significant.

c) **Less than Significant Impact.** Project implementation would use existing infrastructure, including roads, water sources, and power lines, and ~~the established 300-foot brush buffersurrounding the project site~~ implement weed control as part of on-going operations to minimize the risk of wildfire. Project components would be constructed out of soil stabilized with DSS carpet or stabilizing products or prefabricated components made out of wood and metal. In addition, since the project would be developed within an area already functioning as a recreational area, the project would use existing infrastructure in the area, and would not exacerbate fire risk at the project site. Thus, impacts would be less than significant.

d) **Less than Significant Impact.** As discussed in Section VII, the project site is classified as "marginally susceptible" to landslides. In addition, the project site is not located within a flood hazard zone. As detailed above in Section X, construction of the project would not result in significant impacts on the existing drainage pattern due to implementation of BMPs that would minimize flooding and runoff. Drainage for the site would continue to be serviced by the existing storm drain system.

Additionally, it is standard operating procedure for ~~DPR~~ agencies to evaluate a park facility after a natural disaster, such as a wildfire, for possible unsafe conditions (i.e., downed power lines, fallen/unstable trees, unstable slopes, or washed out trails) prior to reopening the facility to the public. ~~DPR~~ The City of Chula Vista would also comply with the Uniform Fire Code and Defensible Space for Fire Protection Ordinance, which require the implementation of best practices for fire. By complying with these measures, the proposed project would reduce potential wildfire risks within the project site. Therefore, with implementation of the standard operating safety procedures and compliance with regulations related to fire risk and protection, the project would not result in significant direct, or cumulative, impacts related to exposing structures or people to significant risk associated with post-fire downslope flooding or landslides and impacts would be less than significant.

Mandatory Findings of Significance

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XXI. MANDATORY FINDINGS OF SIGNIFICANCE —				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

a) **Less than Significant Impact with Mitigation Incorporated.** As discussed in Section IV, *Biological Resources*, the project would result in temporary biological resource impacts during construction of the proposed project. Implementation of MM-BIO-1, MM-BIO-2, and MM-BIO-3 would reduce impacts to less than significant, and ensure that the project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in Section V, *Cultural Resources*, implementation of MM-CUL-1 and MM-CUL-2 would ensure that the project would not eliminate important examples of the major periods of California history or prehistory.

b) **Less than Significant Impact with Mitigation Incorporated.** A cumulative impact would occur if the project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. As indicated throughout this IS/MND, the project would convert the type of recreational use on the project site from passive walking trails to a new bike skills park; however, the project site would still function as a recreational area part of the OVRP. As detailed above, the project would result in less than significant impacts or would be able to reduce impacts to a less than significant level with incorporation of mitigation measures. While construction of the project could overlap with surrounding cumulative projects, due to the limited construction activities which would use small construction equipment, the project would not contribute significantly to any potential cumulative impacts during construction. Once construction is completed, the project would operate similar to existing conditions, where the project would not result in a substantial change from baseline conditions and as such, would not result in significant

cumulative impacts when considered in conjunction with other cumulative projects. Furthermore, the project is located in the OVRP and is surrounded by development to the west, north, and east and natural, open space to the south, where no cumulative projects are in the vicinity of the project site (City of San Diego, 2019). Therefore, the project would result in less than significant cumulative impacts.

c) **Less than Significant Impact with Mitigation Incorporated.** As discussed above, all identified potential impacts associated with the project would be reduced to less than significant with implementation of mitigation measures. No direct or indirect significant and unavoidable impacts would occur with implementation of the project. As a result, the project would not cause a substantial adverse effect on human beings, either directly, or indirectly, with implementation of mitigation measures.

References

City of San Diego, 2019. *Capital Improvement Program Project Search Tool.* Available: https://www.sandiego.gov/cip/projectinfo, accessed on July 10, 2019.

Report:	Biological Resources Letter Report
Project Name:	Otay Valley Regional Park Rios Bike Skills Park
Project Number(s):	*To be provided by the County*
Project Proponent:	County of San Diego Department of Parks & Recreation
Prepared for:	Crystal Benham, County of San Diego Department of Parks & Recreation, 5500 Overland Ave, San Diego, CA; crystal.benham@sdcountyca.gov; (858) 966-1370
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Signature of Preparer:	

1. Summary

ESA, on behalf of the County of San Diego (County) Department of Parks and Recreation (DPR), has prepared this Biological Resources Report for the proposed Otay Valley Regional Park (OVRP) Rios Bike Skills Park project (project) located in the City of San Diego, under City of Chula Vista ownership (Figure 1). The project includes a bike skills park offering a variety of trails and special features, and would be managed by the City of Chula Vista. ESA conducted a biological reconnaissance survey on April 26, 2019 and determined that the project has the potential to result in significant impacts to sensitive vegetation communities and wildlife. Proposed mitigation to reduce impacts to less than significant includes habitat-based mitigation, pre-construction nesting bird surveys, and noise monitoring during the bird breeding season.

2. Introduction, Project Description, Location, Setting

This report describes the results of the biological resources survey conducted for the Otay Valley Regional Park Bike Skills Park project conducted by ESA biologist Cailin Lyons on April 26, 2019. The proposed project is located immediately south of Rancho Drive, in the City of San Diego, west of Interstate 805 and south of Main Street (**Figure 1**). The proposed project would consist of a park separated into various areas dedicated to different bike skills facilities, including a kids park, pump track, jump park, skills trail, and access trails and roads.

An 18-acre Biological Study Area (BSA), including all areas to be potentially impacted and a 100-foot buffer, was evaluated to determine the current condition of the biological resources present within and adjacent to the project (**Figures 2** and **3**). The BSA occurs within Assessor's Parcel Numbers (APN) 624-070-01, 624-070-26, 624-431-66, 624-432-73, 631-013-33, 631-013-34, and 631-013-37, and is located in Section 24 of Township of Township 18 South, Range 2 West of the U.S. Geological Survey (USGS) 7.5-minute topographic map, Imperial Beach quadrangle (see Figure 2). This report provides the necessary biological data and background information required for environmental analysis according to federal, state and local rules and regulations including the California Environmental Quality Act (CEQA) and City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan (1997).

3. Regional Context

The BSA is located within the Otay River Valley area of the City of San Diego MSCP Subarea Plan "Southern Area" (City of San Diego 1997). The Otay River Valley is identified as a significant regional corridor and habitat linkage for the MSCP in this planning area. In addition, portions of the BSA occur within or immediately adjacent to the City's Multi-Habitat Planning Area (MHPA) (**Figure 4**). The MHPA is the area within which the permanent MSCP preserve would be assembled and managed for its biological resources. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region and are considered by the City of San Diego to be sensitive biological resources.

The MSCP also recognizes the Otay River Valley's location relative to the Otay Valley Regional Park. The park, as envisioned, will represent one of the major open space areas within the southern area of San Diego County, linking south San Diego Bay with Lower Otay Reservoir. Planning in this area is guided by the Otay Valley Regional Park Concept Plan, a multi-jurisdictional planning document adopted by the County of San Diego, City of Chula Vista, and City of San Diego for coordinated planning, acquisition, and design for the Otay Valley Regional Park. The Concept Plan provides for the protection of environmentally sensitive areas and important cultural resources by identifying an open space core/preserve arears while identifying areas for active and passive recreational development opportunities, including a trail system with staging areas, viewpoints and overlooks and interpretive centers. The BSA is located in Recreation Area 6 identified by the Concept Plan.

4. Habitats and Vegetation Communities

The BSA contains a total of seven vegetation communities and land cover types: southern arroyo willow riparian forest, coastal and valley freshwater marsh, southern riparian scrub, alkali seep, disturbed Diegan coastal sage scrub, disturbed habitat, and urban/developed (**Table 1** and **Figure 5**). The City of San Diego Biology Guidelines (2012) define sensitive upland habitats into four tiers of sensitivity. Upland vegetation communities that are classified as Tier I (rare uplands), Tier II (uncommon uplands), or Tier III (common uplands) are considered sensitive. Tier IV (other uplands) vegetation communities are not considered sensitive. Wetlands do not have an MSCP tier but are considered a sensitive wetland by local, state, and federal agencies.

Table 1
Vegetation Communities and Land Cover Types Within the Biological Study Area

Vegetation Community/Land Cover Type	MSCP Tier	Existing Acreage Within the BSA
Riparian and Wetlands		
Southern Arroyo Willow Riparian Forest (61320)	NA	3.52
Coastal and Valley Freshwater Marsh (52410)	NA	0.66
Southern Riparian Scrub (63300)	NA	0.60
Alkali Seep (45320)	NA	0.14
Uplands		
Diegan coastal sage scrub – Disturbed (32500)	II	7.65
Other Land Cover Types		
Disturbed (11300)	IV	2.75
Urban/Developed (12000)	N/A	2.68
Total Acres	N/A	18.00

Wetlands

Southern Arroyo Willow Riparian Forest (61320)

Southern arroyo willow riparian forest typically consists of closed or nearly closed canopy stands dominated by arroyo willow associated with perennial streams (Oberbauer et al. 2008). The southern arroyo willow riparian forest in the BSA occurs in the active floodplain of the Otay River and Poggi Creek and is dominated by stands of arroyo willow (*Salix lasiolepis*) and sandbar willow (*Salix exigua*). Scattered gum tree (*Eucalytpus* sp.), mulefat (*Baccharis salicifolia*), tamarisk (*Tamarisk rammosisima*), and Mexican fan palm (*Washingtonia robusta*) also occur throughout the overstory. The understory generally contains limited vegetation, including scattered San Diego marsh elder (*Iva hayesiana*), poison oak (*Toxicodendron diversifolium*), and yerba mansa (*Anemopsis californica*).

Coastal and Valley Freshwater Marsh (52410)

Coastal and valley freshwater marsh is characterized by closed-canopy stands of perennial, emergent monocots in sites that are permanently flooded by freshwater (Oberbauer et al. 2008). Within the BSA, coastal and valley freshwater marsh is comprised of closed-canopy stands of bulrush (*Scirupus* sp.) interspersed between the Southern Arroyo Willow Riparian Forest and Southern Riparian Scrub in the Otay River.

Southern Riparian Scrub (63300)

Southern riparian scrub is typically characterized by desertbroom (*Baccharis sarothroides*), arroyo willow, and other willow species in river systems where flood scour occurs (Oberbauer et al. 2008). Within the BSA, this vegetation community occurs along the southern edge of the Otay River, and is characterized by desertbroom, arroyo willow, mulefat, and arrowweed.

Alkali Seep (45320)

Alkali seep is a vegetation community comprised of low-growing perennial herbs forming relatively complete cover in permanently moist or wet alkaline seeps as part of narrow drainages or springs (Oberbauer et al. 2008). Within the BSA, the alkali seep is dominated by southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*), San Diego marsh elder, alkali heath (*Frankenia salina*), pickleweed (*Salicornia* sp.), and arrowweed. The alkali seep occurs as a flat on the periphery of the Otay River, which appears to provide a perennial source of soil moisture.

Uplands

Diegan Coastal Sage Scrub – Disturbed (32500)

Diegan coastal sage scrub is a vegetation community composed of low-growing, soft-woody shrubs that have an average height of approximately three to four feet (Oberbauer et al. 2008). This community is typically dominated by drought-deciduous species and found on sites with low moisture-availability (Oberbauer et al. 2008). Within the BSA, the Diegan coastal sage scrub (disturbed) contains shrubs typical of Diegan coastal sage scrub, such as desertbroom, California sagebrush (*Artemisia californica*), Menzies' goldenbush (*Isocoma menziesii*), deerweed (*Acmispon glaber* var. *glaber*), arrowweed, and single-whorl burrobrush (*Ambrosia monogyra*). However, past disturbance within the site is evident, and large, dense patches of non-native species such as crown daisy (*Glebionis coronaria*), pineapple weed (*Matricaria discoidea*), red-stem filaree (*Erodium* cicutarium), and shortpod mustard (*Hirschfeldia incana*) dominate throughout.

Other Land Cover Types

Disturbed Habitat (11300)

Disturbed Habitat consists of areas that have been physically disturbed and are no longer recognizable as a native vegetation community but continues to retain a soil substrate (Oberbauer et al. 2008). Vegetation is nearly exclusively comprised of non-native species, including ornamentals or ruderal exotic species (Oberbauer et al. 2008). Within the BSA, the Disturbed Habitat consists primarily of bare ground supporting trails and access roads, with scattered non-native species such as crown daisy, short-pod mustard, and pineapple weed.

Urban/Developed (12000)

Urban/Developed consist of areas that no longer support native vegetation due to physical alteration (Oberbauer et al. 2008). This may include the construction of structures, hardscaping, pavement, and/or landscaping (Oberbauer et al. 2008). Within the BSA, the urban/developed land cover type consists primarily of apartment

buildings and roads along the northern and western boundary. Landscape/ornamental vegetation occurs scattered throughout this area and primarily includes gum tree and other ruderal species.

5. Special-Status Species

Prior to conducting field surveys, a review of publicly available data was conducted to determine the potential for special-status species to occur within the BSA. The review included data provided by U.S. Fish and Wildlife Service (USFWS) (USFWS 2019a and 2019b), CNDDB (CDFW 2019), California Native Plant Society (CNPS 2019), and local databases (SanBIOS 2019). During the field survey, habitats were assessed for their potential to support special-status species and all incidentally observed species were recorded. No focused special-status species surveys were conducted. All plant and wildlife species observed during the general survey are presented in **Appendix 1** and **2**, respectively. The occurrence potential of special-status species was evaluated based on the following criteria:

- **Present:** The species or vegetation community/habitat was observed within the project area and/or immediate vicinity during surveys, or the species has been previously reported within the project area.
- **High Potential:** The project area and/or immediate vicinity provide high quality or ideal habitat (i.e., soils, vegetation assemblage, and topography) for a particular species and/or there are known occurrences in the general vicinity of the project area.
- **Medium Potential:** The project area and/or immediate vicinity provides moderately suitable habitat for a particular species. For example, proper soils may be present, but the desired vegetation assemblage or density is less than ideal; or soils and vegetation are suitable, but the site is outside of the known elevation range of the species.
- **Low Potential:** The project area and/or immediate vicinity provides low quality habitat for a particular species, such as improper soils, disturbed or otherwise degraded habitat, improper assemblage of desired vegetation, and/or the site is outside of the known elevation range of the species.
- **Not Expected:** The project area and/or immediate vicinity does not provide suitable habitat necessary to support the species and/or the site is located outside of the known geographic range of the species. Within suitable habitat, focused protocol surveys and/or botanical surveys conducted during optimal timing (e.g. flowering period) and climatic conditions (e.g. average to above-average hydrologic year) would preclude the presence of the species.

Sensitive Plants

A total of four special-status plant species were observed within the BSA: southwestern spiny rush, San Diego marsh elder, singlewhorl burrobrush, and San Diego viguiera (*Viguiera laciniata*). A comprehensive list of sensitive plant species with potential for occurrence within the BSA based on the records search results is presented in **Appendix C**, and includes those species with potential for occurrence based on species range and habitat conditions.

Singlewhorl burrobrush. This species has a California Native Plant Society (CNPS) Rare Plant Rank of 2B.2 (CNPS 2019). This species occurs in five distinct patches, totaling 0.22 acre, in the disturbed Diegan coastal sage scrub in isolated patches adjacent to Poggi Creek in the northwestern portion of the BSA, and well as along the edges of existing access roads and trails in the southwestern portion of the BSA (see Figure 5).

Southwestern spiny rush. This species has a CNPS Rare Plant Rank of 4.2 (CNPS 2019). A total of 15 individuals were observed within the alkali seep and southern arroyo riparian woodland associated within the Otay River in the southeastern portion of the BSA (see Figure 5).

San Diego marsh elder. This species has a Rare Plant Rank of 2B.2 (CNPS 2019). This species occurs in a singular 0.04 acre patch within the alkali seep, with an additional 5 individuals occurring in the southern arroyo riparian woodland associated within the Otay River in the southeastern portion of the BSA (see Figure 5). This species has also been reported within one mile of the BSA (CDFW 2019).

San Diego viguiera. This species has a CNPS Rare Plant Rank of 4.2 (CNPS 2019). A total of 5 individuals occur within the disturbed Diegan coastal sage scrub in the northern portion of the BSA (see Figure 5).

Sensitive Wildlife

One sensitive wildlife species, Cooper's hawk (*Accipiter cooperi*), was observed within the BSA. An additional six wildlife species have high to moderate potential to occur within the BSA: norther harrier (*Circus cyaneus*), least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), yellow warbler (*Denroica petechia brewsteri*), tri-colored blackbird (*Agelaius tricolor*), coastal California gnatcatcher (*Polioptila californica californica*), and orange-throated whiptail (*Aspidoscelis hyperythra*). A comprehensive list of sensitive wildlife species with potential for occurrence within the BSA based on the records search results is presented in **Appendix D**, and includes those species with potential for occurrence based on species range and habitat conditions.

Cooper's hawk. This species is an MSCP covered species and CDFW watch list species. This species was observed perching on a utility pole in the southern portion of the BSA (see Figure 5). Suitable trees for nesting (e.g. gum tree) occur within the southern arroyo willow riparian forest and urban/developed land within the BSA. This species has also been reported within one mile of the BSA (SanBIOS 2019). No active nests were observed within the BSA at the time of the survey.

Northern harrier. This species is a state species of special concern and is a covered species under the MSCP. This species has high potential to occur within the BSA due to suitable nesting habitat within the freshwater marsh and limited suitable foraging habitat within the disturbed Diegan coastal sage scrub and disturbed habitat on-site. This species has also been reported within one mile of the BSA (SanBIOS 2019).

Least Bell's vireo. This species is a federally and state endangered and is a covered species under the MSCP. This species has high potential to occur within the southern arroyo willow riparian forest and southern riparian scrub along the southern and western portions of the BSA. This species was documented in the southern arroyo willow riparian forest immediately south of the BSA in a survey conducted by the City of San Diego in 2018 and has also been reported within one mile of the BSA (Sara Allen pers. comm.; CDFW 2019; USFWS 2019a).

Southwestern willow flycatcher. This species is state endangered and is a covered species under the MSCP. This species has high potential to occur within the BSA due to the presence of suitable nesting habitat within the southern arroyo willow riparian forest and southern riparian scrub.

Yellow warbler. This species is a state species of special concern. This species has high potential to occur within the BSA due to the presence of suitable nesting habitat within the southern arroyo willow riparian forest and southern riparian scrub.

Tri-colored blackbird. This species is a state species of special concern and is a covered species under the MSCP. This species has high potential to occur within the BSA due to the presence of suitable nesting habitat within the coastal and valley freshwater marsh.

Coastal California gnatcatcher. This species is federally threated and a state species of special concern and is a covered species under the MSCP. This species has high potential to occur within the disturbed Diegan coastal sage scrub within the BSA. Areas of the disturbed Diegan coastal sage scrub provide moderate densities of native shrubs suitable for nesting. This species has also been reported within one mile of the BSA (SanBIOS 2019; CDFW 2019; USFWS 2019a).

Orange-throated whiptail. This species is a state species of special concern and is a covered species under the MSCP. This species has moderate potential to occur within the BSA due to the presence of suitable semi-arid brushy areas on-site. This species has also been reported within one mile of the BSA (CDFW 2019).

Nesting/Migratory Birds. The project also has potential to support migratory and nesting birds within the entire BSA. Migratory and nesting birds are protected under the California Fish and Game Code and federal Migratory Bird Treaty Act.

6. Jurisdictional Wetlands and Waterways

The biological reconnaissance survey included an evaluation of potential waters and wetlands under the jurisdiction of the U.S. Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act (CWA); the San Diego Regional Water Quality Control Board (RWQCB) under CWA Section 401; and CDFW under California Fish and Game Code Section 1600. The southern riparian scrub, southern arroyo willow riparian woodland, coastal and valley freshwater marsh, and alkali seep associated with the Otay River and Poggi Creek are likely considered jurisdictional by USACE, CDFW, and RWQCB. However, as the project design avoids impacts to these potentially jurisdictional areas and incorporates a buffer distance of 25 to 50 feet, a formal delineation to quantify the acreages of potential jurisdictional wetlands and waters in the BSA is not required.

7. Other Unique Features/Resources

The BSA is located in the Otay River Valley which is considered a regionally significant wildlife movement corridor per the MSCP. However, the project impact area consists of a primarily disturbed site up-slope of the Otay River, bounded by residential development to the north, east, and west. Due to the site's location on the periphery of the river valley adjacent to development, habitat within the BSA likely provides for local wildlife movement but does not provide a throughway for wildlife movement into off-site open space areas.

8. Significance of Project Impacts and Proposed Mitigation

This section discusses direct and indirect impacts to biological resources that are expected to result from the project. Impacts were evaluated according to the City of San Diego California Environmental Quality Act Significance Determination Thresholds (City of San Diego 2011). Direct impacts include alteration, disturbance, or destruction of biological resources; indirect impacts include impacts such as elevated noise and dust levels, soil compaction, decreased water quality, and introduction of invasive species.

Habitats and Vegetation Communities

The project would result in a total of 6.77 acres of impacts to vegetation communities and land cover types outside of the MHPA, including 5.14 acres of disturbed Diegan coastal sage scrub and 1.63 acres of disturbed habitat (**Figure 6**). Impacts to disturbed Diegan coastal sage scrub (Tier II) are considered significant and would require mitigation. Impacts to disturbed habitat (Tier IV) are considered not significant and would not require mitigation. **Table 2** summarizes the permanent and temporary impacts to the vegetation communities and land cover types within the project impact area and the required mitigation. Mitigation is intended to reduce the impacts to a level of less than significant. Mitigation can be accomplished through on-site preservation, restoration or creation; purchase of off-site habitat; or payment of fees into the City's in-lieu fee program or an authorized mitigation bank.

Table 2
Vegetation Communities and Land Cover Types, Impacts, & Mitigation

Vegetation Community/Land Cover Type	Existing Acreage Within the BSA	Permanent Impacts (Acres)	Temporary Impacts (Acres)	Mitigation Ratio	Required Mitigation (Acres)
Riparian and Wetlands					
Southern Arroyo Willow Riparian Forest (61320)	3.52	0.00	0.00	NA	0.00
Coastal and Valley Freshwater Marsh (52410)	0.66	0.00	0.00	NA	0.00
Southern Riparian Scrub (63300)	0.60	0.00	0.00	NA	0.00
Alkali Seep (45320)	0.14	0.00	0.00	NA	0.00
Uplands					
Diegan coastal sage scrub – Disturbed (32500)	7.65	0.78	4.36	1.1 to 1.5:1	7.32*
Other Land Cover Types					
Disturbed (11300)	2.75	0.31	1.32	NA	0.00
Urban/Developed (12000)	2.68	0.00	0.00	NA	0.00
Total Acres	18.00	1.09	5.68	-	7.32

*Mitigation assumes permanent impacts will be mitigated off-site inside the MHPA at a ratio of 1:1, totaling 0.78 acre. Temporary impacts will be mitigated on-site outside of the MHPA, thus requiring a 1.5:1 mitigation ratio, totaling 6.54 acres. Thus, the total mitigation requirement will be 7.32 acres.

Sensitive Plants

The project would avoid impacts to the San Diego marsh elder, southwestern spiny rush, and singlewhorl burrobrush occurring within the BSA. However, a total of five San Diego sunflower individuals are present within the project impact area and project construction activities could result in the loss of these individuals. The loss of these five plants would be less than significant because adequate habitat for this species within the region is conserved by the MSCP and project impacts are not expected to substantially reduce the viability of this species population. Therefore, no mitigation is required.

Sensitive Wildlife

Wildlife. The project may result in direct impacts to small mammals and reptiles with low mobility, including orange-throated whiptail. While it is anticipated that most mammals, reptiles, and birds will be able to move out of the way during grading, any project impacts to these species would be less than significant because adequate habitat for these species is conserved by the MSCP and project impacts are not expected to substantially reduce the viability of these species' populations. Therefore, no mitigation is required.

Migratory & Nesting Birds. Direct impacts to migratory and nesting birds, including coastal California gnatcatcher, could result from the accidental destruction of nests through removal of disturbed coastal sage scrub and disturbed habitat, if construction were to occur during the general bird breeding season (January 15 and September 15). Direct impacts to migratory and nesting birds would be considered significant. To reduce these impacts to a level of less than significant, the following mitigation measure is recommended:

> **BIO-1:** Nesting Season Avoidance or Pre-Construction Survey: If construction initiation occurs between January 15 and September 15, a pre-construction nesting bird and raptor survey of the project area and an appropriate buffer of up to 900 feet shall be completed by a qualified biologist prior to vegetation removal. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). If any active nests are detected, the area will be flagged and mapped on construction plans along with a buffer as recommended by the qualified biologist. The buffer area(s) established by the qualified biologist will be avoided until the nesting cycle is complete or it is determined that the nest is no longer active. The qualified biologist shall be a person familiar with bird breeding behavior and capable of identifying the bird species of San Diego County by sight and sound and determining alterations of behavior as a result of human interaction. Buffers will be based on MSCP buffer requirements and/or local topography and line of sight, species behavior and tolerance to disturbance, and existing disturbance levels, as determined appropriate by the qualified biologist.

Indirect Impacts. Indirect impacts could result from excessive noise generated during project construction should grading occur adjacent to occupied habitat in the MHPA during the breeding season for the following species: coastal California gnatcatcher, least Bell's vireo, southwestern willow flycatcher, tri-colored blackbird, northern harrier, and Cooper's hawk. Indirect impacts to these species during the nesting season would be considered significant.

The City of San Diego's Biology Guidelines (2012) requires implementation of an avoidance buffer of 900 feet for active northern harrier nests and 300 feet for Cooper's hawk nests occurring in the MHPA. Implementation of measure **BIO-1** would reduce potential impacts to nesting northern harriers and Cooper's hawks within the MHPA to less than significant. The City of San Diego's Biology Guidelines (2012) requires noise attenuation for potentially significant noise-related indirect impacts for coastal California gnatcatcher, least Bell's vireo, southwestern willow flycatcher, and tri-colored blackbird should construction occur adjacent to occupied habitat within the MHPA during the breeding season (March 1 through August 30, collectively). To reduce these impacts to a level of less than significant, the following avoidance and minimization measure is recommended:

> **BIO-2:** No clearing, grubbing, grading, or other construction activities shall occur between March 1 and August 30, until the following requirements have been met:

Between March 1 and August 30, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of the MHPA. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by DPR (or appointed designee) at least two weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; or

At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of the MHPA. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB(A) hourly average. Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB (A) hourly average or to the ambient noise level if it already exceeds 60 dB (A) hourly average. If not, other measures shall be implemented in consultation with the biologist and DPR (or appointed designee), as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 30).

Jurisdictional Wetlands and Waterways

The project would avoid direct impacts to any potentially jurisdictional wetlands or waters within the BSA. To avoid indirect impacts, the project design incorporates a minimum 50-foot buffer from riparian habitats associated with the Otay River and Poggi Creek and a 25-foot buffer from the alkali flat. The project impact area is topographically separated from these features by slopes, as well as by a trail for portions of the Otay River and alkali flat occurring south of the site. The project also complies with the MSCP land use adjacency guidelines, which prohibits drainage into these areas which are partially protected within the MHPA. Thus, potential indirect impacts to jurisdictional wetlands or waters would be less than significant and no mitigation would be required.

Wildlife Movement and Nursery Sites

Though it is reasonable to assume that wildlife movement may occur locally within the project impact area, the project impact area as a whole does not provide a throughway for wildlife species and therefore does not function as a significant linkage associated with the Otay River Valley regional wildlife corridor. Thus, the project is not anticipated to interfere with wildlife movement and impacts are considered less significant; no mitigation would be required.

Local Policies, Ordinances, and Adopted Plans

The project impact area does not overlap any hardline preserve areas or conflict with any provisions of the MSCP. However, a majority of the project site is located directly adjacent or in close proximity to City's MHPA (see Figure 4). Thus, the project is required to comply with the following Land Use Adjacency Guidelines from the City of San Diego MSCP Subarea Plan (1997) as a condition of project approval:

Drainage

1. All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.

Toxics

2. 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 should 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 should be incorporated into leases on publicly owned property as leases come up for renewal.

Noise

3. Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.

Barriers

4. New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.

Invasives

5. No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.

Grading/Land Development

6. Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

The Land Use Adjacency Guidelines related to lighting and brush management are not applicable to the project, as no lighting or brush management zones are proposed as part of the project.

Cumulative Impacts

The geographic scope for cumulative impacts related to biological resources includes the Cities of San Diego and Chula Vista, as well as the un-incorporated communities in south San Diego County. These jurisdictions are all participants in the MSCP, which constitutes a subregional plan pursuant to the state of California Natural Community Conservation Planning Act and an HCP pursuant to Section 10(a)(1)(b) of the Federal Endangered Species Act. The MSCP considers biological resource conservation on a sub-regional scale and therefore serves as an appropriate measure of cumulative impacts. The City of San Diego's MSCP Subarea Plan, City of Chula Vista's MSCP Subarea Plan, and the County of San Diego Subarea Plan serve as the local implementation plans for the sub-regional MSCP. As such, the MSCP and its Subarea Plans provide mitigation programs to address the effects of cumulative development. If a project is determined to be consistent with the MSCP and applicable Subarea Plan, and/or provides appropriate mitigation to ensure the integrity of the plans, its cumulative effects would not be considered significant. The proposed project would be consistent with both the City of San Diego's MSCP Subarea Plan, which is the applicable Subarea Plan for the project site, and therefore no significant cumulative impacts to biological resources would result from implementation of the proposed project.

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11. Appendices

A – Plant Species Inventory
B – Wildlife Species Inventory
C – Special-Status Plant Species
D – Special-Status Wildlife Species

Appendix A
Plant Species Inventory

APPENDIX A: FLORAL COMPENDIUM

MAGNOLIIDS

Sauruaceae	**Lizard's-Tail Family**
Anemopsis californica	yerba mansa

CERATOPHYLLALES

	Scientific Name	**Common Name**
Ceratophyllaceae		**Hornwort Family**
*	*Mesembryanthemum crystallinum*	common iceplant
Amaranthaceae		**Amaranth Family**
*	*Amaranthus albus*	tumbling pigweed
Anacardiaceae		**Sumac Family**
	Malosma laurina	laurel sumac
	Rhus integrifolia	lemonade sumac
	Toxicodendron diversilobum	poison oak
Asteraceae		**Aster Family**
	Baccharis salicifolia	mule fat
	Baccharis sarothroides	desertbroom
*	*Centaurea melitensis*	tocalote/ Maltese star-thistle
*	*Glebionis coronaria*	garland daisy
	Encelia californica	California encelia
	Hazardia squarrosa	sawtooth goldenbush
	Isocoma menziesii	Menzies' goldenbush
	Iva hayesiana	San Diego marsh elder
	Matricaria discoidea	pineapple weed
	Pluchea sericea	arrowweed
*	*Sonchus asper*	spiny sowthistle
	Viguiera laciniata	San Diego viguiera
Boraginaceae		**Borage Family**
	Amsinckia intermedia	common fiddleneck
	Heliotropium curassavicum	salt heliotrope
Brassicaceae		**Mustard Family**
*	*Hirschfeldia incana*	shortpod mustard
	Raphanus sativus	cultivated radish
*	*Sisymbrium orientale*	Indian hedgemustard

Cactaceae		**Cactus Family**
	Cylindropuntia prolifera	coastal cholla
Chenopodiaceae		**Goosefoot Family**
	Salicornia sp.	pickleweed
*	*Salsola tragus*	prickly Russian thistle
Cucurbitaceae		**Gourd Family**
	Cucurbita palmata	coyote gourd
Euphorbiaceae		**Spurge Family**
*	*Euphorbia maculata*	spotted spurge
*	*Ricinus communis*	castor bean
Fabaceae		**Legume Family**
	Acmispon glaber var. *glaber*	deerweed
*	*Melilotus officinalis*	yellow sweet clover
Frankeniaceae		**Frankenia Family**
	Frankenia salina	alkali heath
Geraniaceae		**Geranium Family**
*	*Erodium cicutarium*	redstem filaree
Lamiaceae		**Mint Family**
*	*Marrubium vulgare*	horehound
Malvaceae		**Mallow Family**
*	*Malva parviflora*	cheeseweed
Myrtaceae		**Myrtle Family**
*	*Eucalyptus sp.*	gum tree
Plumbaginaceae		**Leadwort Family**
	Limonium californicum	western marsh-rosemary
Polygonaceae		**Buckwheat Family**
	Eriogonum fasciculatum	California buckwheat
Salicaceae		**Willow Family**
	Salix exigua	sandbar willow
	Salix lasiolepis	arroyo willow
Solanaceae		**Nightshade Family**
*	*Nicotiana glauca*	tree tobacco
*	*Solanum elaeagnifolium*	white horse-nettle
Tamaricaceae		**Tamarix Family**
*	*Tamarix ramosissima*	Mediterranean tamarisk
Urticaceae		**Nettle Family**
*	*Urtica urens*	dwarf nettle

MONOCOTYLEDONS

Scientific Name	Common Name
Agavaceae	**Agave Family**
* *Yucca elephantipes*	giant yucca
Arecaceae	**Palm Family**
* *Washingtonia robusta*	Mexican fan palm
Cyperaceae	**Sedge Family**
Scirpus sp.	bulrush
Juncaceae	**Rush Family**
Juncus acutus ssp. leopoldii	southwestern spiny rush
Poaceae	**Grass Family**
* *Arundo donax*	giant reed
* *Bromus diandrus*	ripgut grass
* *Bromus madritensis ssp. rubens*	foxtail chess
* *Hordeum murinum*	glaucous foxtail barley
* *Pennisetum setaceum*	African fountain grass
* *Polypogon monspeliensis*	annual beard grass

Appendix B
Wildlife Species Inventory

APPENDIX B: FAUNAL COMPENDIUM

REPTILES

Scientific Name	Common Name
Phrynosomatidae	**Zebratail, Earless, Horned, Spiny, Fringe-Toed Lizards**
Sceloporus occidentalis	western fence lizard

BIRDS

Scientific Name	Common Name
ACCIPITRIFORMES	
Accipitridae	**Hawks**
Accipiter cooperii	Cooper's hawk
Buteo jamaicensis	red-tailed hawk
Circus cyaneus	northern harrier
COLUMBIFORMES	
Columbidae	**Pigeons and Doves**
Zenaida macroura	mourning dove
Trochilidae	**Hummingbirds**
Calypte anna	Anna's hummingbird
PASSERIFORMES	
Corvidae	**Jays and Crows**
Corvus brachyrhynchos	American crow
Emberizidae	**Emberizine Sparrows and Allies**
Zonotrichia leucophrys	white-crowned sparrow
Zonotrichia querula	Harris' sparrow
Cardinalidae	**Buntings, Grosbeaks, and Tanagers**
Pheucticus melanocephalus	black-headed grosbeak
Fringillidae	**Finches**
Spinus psaltria	lesser goldfinch

MAMMALS

Scientific Name	Common Name
Leporidae	**Hares and Rabbits**
Sylvilagus audubonii	desert cottontail
Sciuridae	**Squirrels and Chipmunks**
Otospermophilus beecheyi	California ground squirrel

Appendix C
Special-Status Plant Species

APPENDIX C: SPECIAL-STATUS PLANT SPECIES WITH POTENTIAL TO OCCUR

Scientific Name	Common Name	Flowering Period	Federal	State	Local (CRPR/ Other)	Preferred Habitat	Distribution	
ANGIOSPERMS (DICOTYLEDONS)								
Apiaceae	**Carrot Family**							
Eryngium aristulatum var. *parishii*	San Diego button-celery	Apr.-Jun.	FE	CE	1B.1 MSCP NE	Coastal scrub, valley and foothill grassland, vernal pools; grows within San Diego mesa hardpan, claypan vernal pools, southern interior basalt flow vernal pools. 20-620 meters.	San Diego and Riverside.	**None** BSA lacks suitable vernal pool habitat. Species would have be in flower at the time survey was conducted.
Asteraceae	**Sunflower Family**							
Ambrosia chenopodifolia	San Diego bur-sage	Apr.-Jun.	None	None	2B.1	Coastal scrub. 55-155 meters.	San Diego and Baja California.	**None** This species is not expected to occur within the disturbed Diegan coastal sage scrub on-site as it is a perennial species that would likely have been observed if present. This species has been reported within one mile of the BSA (CDFW 2019).
Ambrosia monogyra	singlewhorl burrobrush	Aug.-Nov.	None	None	2B.2	Chaparral, coastal scrub, desert dunes/sandy; Dry, sunny grasslands on disturbed sites. 10-500 meters.	Riverside, San Diego, and Baja California.	**Observed** This species was observed in the northwestern and southwestern portions of the BSA, outside of the project impact area.
Ambrosia pumila	San Diego ambrosia	Apr.-Oct.	None	None	1B.1 MSCP NE	Chaparral, coastal scrub, valley and foothill grassland, and vernal pools. Sandy loam and clay. 20-415 meters.	Riverside, San Diego, and Baja California.	**None** This species is not expected to occur within the disturbed Diegan coastal sage scrub on-site as this species is a perennial herb that would have been in flower and

Scientific Name	Common Name	Flowering Period	Federal	State	Local (CRPR/ Other)	Preferred Habitat	Distribution	
								apparent at the time surveys were conducted.
Baccharis vanessae	Encinitas baccharis	Aug.-Nov.	FT	CE	1B.1 MSCP NE	Maritime chaparral, cismontane woodland; sandstone. 60-720 meters.	San Diego.	**None** BSA lacks suitable maritime chaparral and cismontane woodland habitat. Species is also a conspicuous perennial that would likely have been observed at the time of the survey if present.
Ericameria palmeri	Palmer's goldenbush	Sep.-Nov.	None	None	1B.1 MSCP	Mesic chaparral and coastal scrub. 30-600 meters.	San Diego and Baja California.	**None** This species is not expected to occur within the disturbed Diegan coastal sage scrub on-site as this species is a conspicuous perennial that would likely have been observed at the time of the survey if present. This species has been reported within one mile of the BSA (CDFW 2019).
Deinandra conjugens	Otay tarplant	Apr.-Jun.	FT	CE	1B.1 MSCP NE	Coastal scrub, valley and foothill grassland; clay soils. 25-300 meters.	San Diego and Baja California.	**None** This species is not expected to occur within the disturbed Diegan coastal sage scrub on-site as surveys were conducted at an appropriate time of year to detect vegetative and flowering individuals. This species has been reported within one mile of the BSA (SanBIOS 2019).
Iva hayesiana	San Diego marsh elder	Apr.-Oct.	None	None	2B.2	Marshes and swamps, playas. 10-500 meters.	San Diego and Baja California.	**Observed** This species was observed within the southern portion of the BSA outside of the project impact area. This species has also been reported within one mile of the BSA (CDFW 2019).
Viguiera laciniata	San Diego viguiera	Feb.-Jun.	None	None	4.3	Chaparral, coastal scrub; grows along slopes and	San Diego and Baja California.	**Observed** A total of 5 individuals were

Scientific Name	Common Name	Flowering Period	Federal	State	Local (CRPR/ Other)	Preferred Habitat	Distribution	
						ridgelines. 60-750 meters.		observed within the BSA, inside the project impact area.
Cactaceae	**Cactus Family**							
Cylindropuntia californica var. californica	snake cholla	Apr.-May	None	None	1B.1 MSCP NE	Chaparral, coastal scrub. 30-150 meters.	San Diego and Baja California.	**None** Species is a conspicuous perennial stem succulent that would likely have been observed at the time of the survey if present.
Ferocactus viridescens	San Diego barrel cactus	May-Jun.	None	None	2B.1 MSCP	Chaparral, coastal scrub, valley and foothill grassland, and vernal pools. 3-450 meters.	San Diego and Baja California.	**None** Species is a conspicuous perennial stem succulent that would likely have been observed at the time of the survey if present.This species has been reported within one mile of the BSA (CDFW 2019).
Chenopodiaceae	**Goosefoot Family**							
Aphanisma blitoides	aphanisma	Feb.-Jun.	None	None	1B.2 MSCP NE	Sandy. Coastal bluff scrub, Coastal dunes, Coastal scrub. 1-305 meters	Los Angeles, Orange, Ventura, San Diego.	**None** This species is not expected to occur within the disturbed Diegan coastal sage scrub on-site due to lack of suitable sandy soils. Additionally, surveys were conducted at an appropriate time of year to detect vegetative and flowering individuals.
Crassulaceae	**Stonecrop Family**							
Dudleya blochmaniae ssp. *blochmaniae*	Blochman's dudleya	Apr.-Jun.	None	None	1B.1 MSCP NE	Coastal bluff scrub, coastal scrub, valley and foothill grassland/often clay. 5-450 meters.	Los Angeles, Orange, Santa Barbara, Ventura.	**None** This species is not expected to occur within the disturbed Diegan coastal sage scrub on-site as surveys were conducted at an appropriate time of year to detect vegetative and flowering individuals.

Scientific Name	Common Name	Flowering Period	Federal	State	Local (CRPR/ Other)	Preferred Habitat	Distribution	
Dudleya variegata	variegated dudleya	Apr.-Jun.	None	None	1B.2 MSCP NE	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland, and vernal pools. Clay soils. 3-580 meters.	San Diego and Baja California.	**None** This species is not expected to occur within the disturbed Diegan coastal sage scrub on-site as surveys were conducted at an appropriate time of year to detect vegetative and flowering individuals.This species has been reported within one mile of the BSA (CDFW 2019).
Fabaceae	**Legume Family**							
Astragalus tener var. *titi*	coastal dunes milk-vetch	Mar.-May	FE	CE	1B.1 MSCP NE	Coastal bluff scrub (sandy), coastal dunes, coastal prairie (mesic); often vernally mesic areas. 1-50 meters	Los Angeles and San Diego.	**None** BSA lacks suitable coastal bluff scrub, coastal dunes, and coastal prairie habitat. Species is also a conspicuous perennial that would likely have been observed at the time of the survey if present. Additionally, surveys were conducted at an appropriate time of year to detect flowering individuals.
Lamiaceae	**Mint Family**							
Acanthomintha ilicifolia	San Diego thorn-mint	Apr.-Jun.	FT	CE	1B.1 MSCP NE	Chaparral, coastal scrub, valley and foothill grassland, and vernal pools. Clay openings. 520-1370 meters.	San Diego and Baja California.	**None** This species is not expected to occur within the disturbed Diegan coastal sage scrub on-site as site lacks suitable friable clay lens soils. Additionally, surveys were conducted at an appropriate time of year to detect flowering individuals. This species has been reported within one mile of the BSA (CDFW 2019).
Pogogyne abramsii	San Diego mesa mint	Mar.-Jul.	FE	CE	1B.1 MSCP NE	Vernal pools. 90-200 meters.	San Diego.	**None** BSA lacks suitable vernal pool habitat. Additionally, surveys were conducted at an appropriate time of year to detect flowering individuals.

Scientific Name	Common Name	Flowering Period	Federal	State	Local (CRPR/ Other)	Preferred Habitat	Distribution	
Pogoyyne nudiuscula	Otay mesa mint	May-Jul.	FE	CE	1B.1 MSCP NE	Vernal pools.	San Diego and Baja California.	**None** BSA lacks suitable vernal pool habitat.
Orobanchaceae	**Broomrape Family**							
Dicranostegia orcuttiana	Orcutt's bird's beak	Apr.-Jul.	None	None	2B.1 MSCP	Coastal sage scrub. 10-350 meters.	San Diego and Baja California.	**None** This species is not expected to occur within the disturbed Diegan coastal sage scrub on-site as surveys were conducted at an appropriate time of year to detect vegetative and flowering individuals. This species has been reported within one mile of the BSA (CDFW 2019).
Plantaginaceae	**Plantain Family**							
Stemodia durantifolia	purple stemodia	Apr., Jun., Aug., Sep., Oct., Dec.	None	None	2B.1	Sonoran desert scrub. Mesic, sandy creeks and drainages. 180-300 meters.	San Diego, Riverside, Baja California, Arizona, Texas, and Mexico.	**None** BSA lacks suitable sandy creek and drainage habitats. Additionally, surveys were conducted at an appropriate time of year to detect vegetative and flowering individuals. This species has been reported within one mile of the BSA (CDFW 2019).
Polemoniaceae	**Phlox Family**							
Navarretia fossalis	spreading navarretia	Apr.-Jun.	FT	None	1B.1 MSCP NE	Chenopod scrub, marshes and swamps, playas, and vernal pools.	Los Angeles, Riverside, San Diego, San Luis Obispo.	**None** BSA lacks suitable vernal pool habitat. Additionally, surveys were conducted at an appropriate time of year to detect flowering individuals.
Rhamnaceae	**Buckthorn Family**							

Scientific Name	Common Name	Flowering Period	Federal	State	Local (CRPR/ Other)	Preferred Habitat	Distribution	
Adolphia californica	California adolphia	Dec-May	None	None	2B.1	Chaparral, coastal sage scrub, valley and foothill grassland; clay soils. 10-740 meters.	San Diego, Baja California, and Arizona.	**None** Species is a conspicuous perennial that would likely have been observed at the time of the survey if present. This species has been reported within one mile of the BSA (CDFW 2019).
Rosaceae	**Rose Family**							
Rosa minutifolia	Small-leaved rose	Jan.-Jun.	None	CE	2B.1	Chaparral, coastal scrub. 150-160 meters.	San Diego and Baja California.	**None** Species is a conspicuous perennial that would likely have been observed at the time of the survey if present. This species has been reported within one mile of the BSA (CDFW 2019).
ANGIOSPERMS (MONOCOTYLEDONS)								
Agavaceae	**Agave Family**							
Agave shawii	Shaw's agave	Sep.-May	None	None	2B.1 MSCP NE	Coastal bluff scrub, coastal scrub, maritime succulent scrub. 20-620 meters.	San Diego and Baja California.	**None** This species is not expected to occur within the disturbed Diegan coastal sage scrub on-site as it is a conspicuous perennial species that would likely have been observed if present.
Juncaceae	**Juncus**							
Juncus acutus ssp. *leopoldii*	southwestern spiny rush	Mar.-Jun.	None	None	4.2	Mesic soils in coastal dunes; alkaline seeps in meadows; coastal salt marshes and swamps. 3 - 900 meters	Los Angeles, Orange, San Diego, Ventura.	**Observed** A total of 15 individuals were observed within the BSA, outside of the project impact area.

Scientific Name	Common Name	Flowering Period	Federal	State	Local (CRPR/ Other)	Preferred Habitat	Distribution	
Poaceae	**True Grass Family**							
Orcuttia californica	California Orcutt grass	Apr.-Aug.	FE	SE	1B.1 MSCP NE	Vernal pools. 15 - 660 meters	Los Angeles, Riverside, San Diego, Ventura.	**None** BSA lacks suitable vernal pool habitat. Additionally, surveys were conducted at an appropriate time of year to detect flowering individuals.

Key to Species Listing Status Codes

fe	*Federally Endangered*	se	*State Listed as Endangered*
ft	*Federally Threatened*	st	*State Listed as Threatened*
mscp	*City of San Diego Multiple Species Conservation Plan (MSCP) covered species*		
ne	*MSCP narrow endemic species*		

Appendix D
Special-Status Wildlife Species

APPENDIX D: SPECIAL-STATUS WILDLIFE SPECIES WITH POTENTIAL TO OCCUR

Scientific Name	Common Name	Federal	State	MSCP	Preferred Habitat	Potential for Occurrence in the Study Area
REPTILES						
Teiidae	**Whiptail Family**					
Aspidoscelis hyperythra	orange-throated whiptail	NONE	SSC	MSCP	Chaparral, non-native grassland, Riversidean sage scrub, and juniper and oak woodlands. Associated with riparian areas and alluvial fan scrub habitats.	**Moderate** This species has moderate potential to occur within the BSA due to the presence of suitable semi-arid brushy areas on-site. This species has also been reported within one mile of the BSA (CDFW 2019).
BIRDS						
Accipitridae	**Hawks, Kites, Harriers and Eagle Family**					
Circus cyaneus	northern harrier	NONE	SSC	MSCP	Coastal salt marshes, freshwater marshes, grasslands, and agricultural fields; occasionally forages over open desert and brushlands.	**High** This species has high potential to occur within the BSA outside of the project impact area due to suitable nesting habitat within the freshwater marsh. Habitats within the project impact area also provide limited suitable foraging habitat. This species has also been

Scientific Name	Common Name	Federal	State	MSCP	Preferred Habitat	Potential for Occurrence in the Study Area
						reported within one mile of the BSA (SanBIOS 2019).
Accipiter cooperi	Cooper's hawk	NONE	WL	MSCP	Fairly common winter visitor in California, but breeding populations have declined due to loss of habitat and human disturbance. Nests primarily in fairly dense oak and riparian woodlands and forages over open lands.	**Observed** This species was observed within the southern portion of the BSA. Suitable nesting habitat (e.g. gum trees [*Eucalyptus* sp.]) is located adjacent to the project impact area within the southern arroyo willow riparian forest and urban/developed land within the BSA. This species has also been reported within one mile of the BSA (SanBIOS 2019).
Tyrannidae	**Tyrant Flycatchers**					
Empidonax traillii extimus	southwestern willow flycatcher	FE	SE	MSCP	Low brushy vegetation in wet areas, especially riparian willow thickets.	**High** This species has high potential to occur within the BSA outside of the project impact area due to suitable nesting habitat within the southern arroyo willow riparian forest and southern riparian scrub.
Vireonidae	**Vireos**					
Vireo bellii pusillus	least Bell's vireo	FE	SE	MSCP	Found especially in willow and mesquite thickets near water.	**High** This species has high potential to occur within the BSA outside of the project impact area due

Scientific Name	Common Name	Federal	State	MSCP	Preferred Habitat	Potential for Occurrence in the Study Area
						to suitable nesting habitat within the southern arroyo willow riparian forest and southern riparian scrub. This species was documented in the southern arroyo willow riparian forest immediately south of the BSA in a survey conducted by the City of San Diego in 2018 and has also been reported within one mile of the BSA (Sara Allen pers. comm.; CDFW 2019; USFWS 2019a).
Parulidae	**Wood Warblers**					
Dendroica petechia brewsteri	yellow warbler	NONE	SSC	NONE	Riparian woodlands, montane chaparral, open ponderosa pine and mixed coniferous habitat with significant brush.	**High** This species has high potential to occur within the BSA outside of the project impact area due to the presence of suitable nesting habitat within the southern arroyo willow riparian forest and southern riparian scrub.
Sylviidae	**Old World Warblers, Gnatcatchers**					
Polioptila californica californica	Coastal California gnatcatcher	FT	SSC	MSCP	Coastal sage scrub vegetation below 2,500 feet elevation in Southern California; generally avoids steep slopes and dense vegetation for nesting.	**High** This species has high potential to occur within the BSA inside the project impact area due to the presence of suitable native shrubs

Scientific Name	Common Name	Federal	State	MSCP	Preferred Habitat	Potential for Occurrence in the Study Area
						for nesting at moderate densities within the disturbed Diegan coastal sage scrub. This species has also been reported within one mile of the BSA (SanBIOS 2019; CDFW 2019; USFWS 2019a).
Icteridae	**Blackbird Family**					
Agelaius tricolor	Tricolored blackbird	NONE	SSC	MSCP	Highly colonial species. Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.	**High** This species has high potential to occur within the BSA outside of the project impact area due to suitable nesting habitat within the coastal and valley freshwater marsh.

fe	Federally Listed as Endangered	se	State Listed as Endangered
ft	Federally Listed as Threatened	ssc	California Species of Special Concern
mscp	City of San Diego Multiple Species Conservation Program (MSCP) covered species	wl	CDFW Watch List

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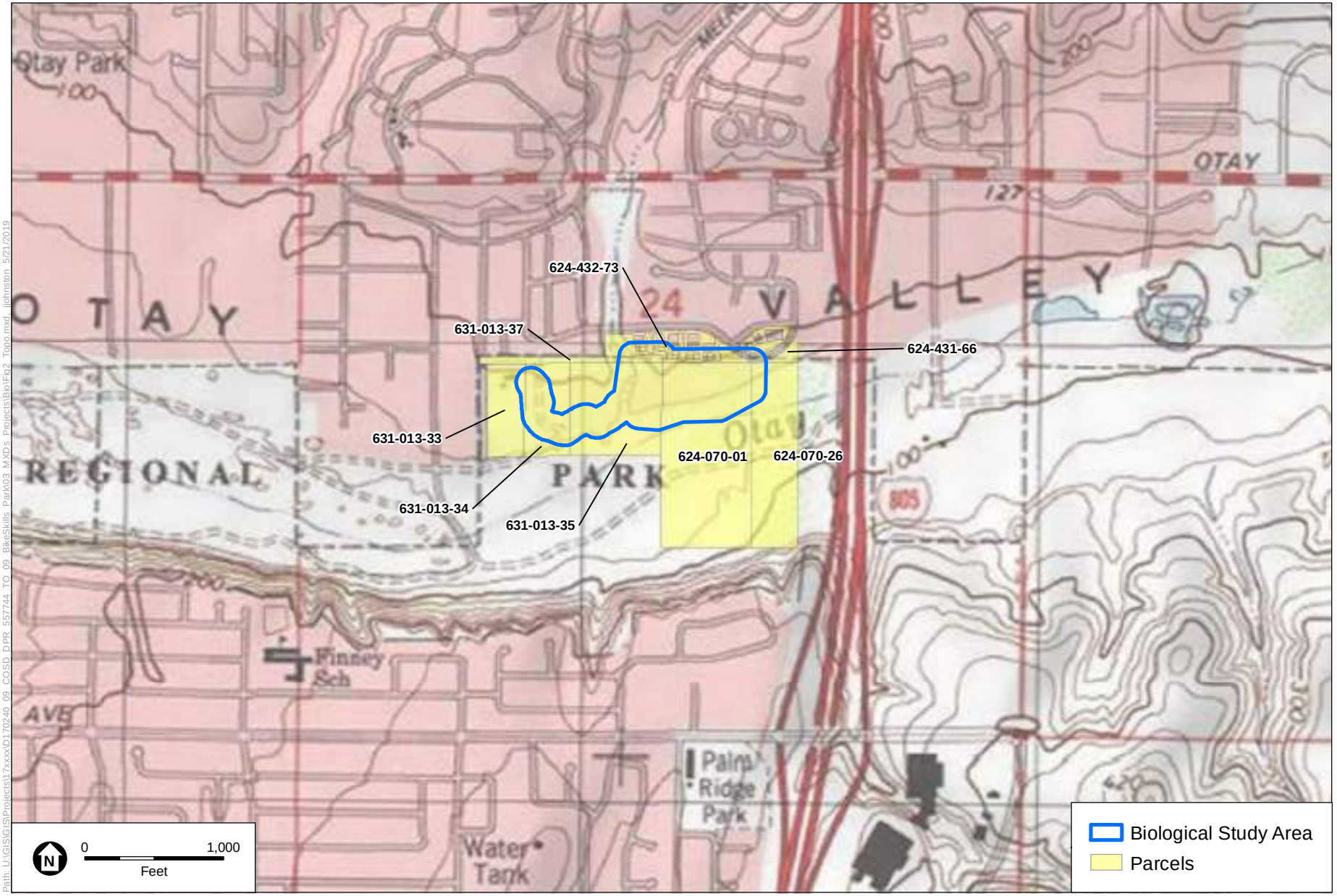
SOURCE: SanGIS

COSD DPR 557744 TO 07 Rios Bike Skills Park

Figure 1
Project Vicinity

ESA



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USGS 7.5' Topo Quad Imperial Beach 1975, 1977; SanGIS 2019

D170240.09 COSD DPR 557744 TO 09 Rios Bike Skills Park

Figure 2
Vicinity Map

ESA

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SOURCE: Mapbox

COSD DPR 557744 TO 09 Rios Bike Skills Park

Figure 3
Project Location

ESA

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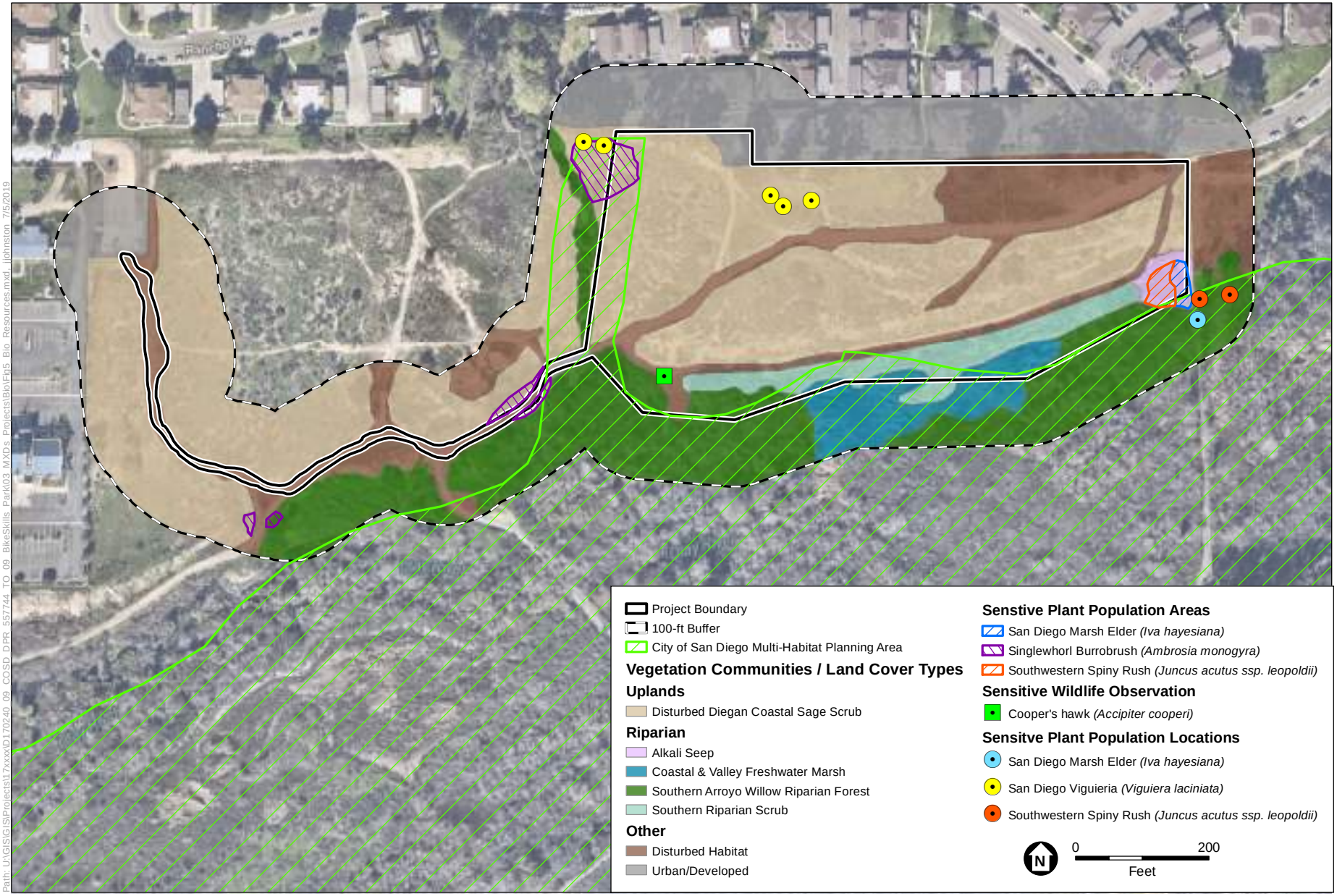
SOURCE: Mapbox; SanGIS 2019

COSD DPR 557744 TO 09 Rios Bike Skills Park

Figure 4

Project in Relation to MSCP Preserve Area

ESA



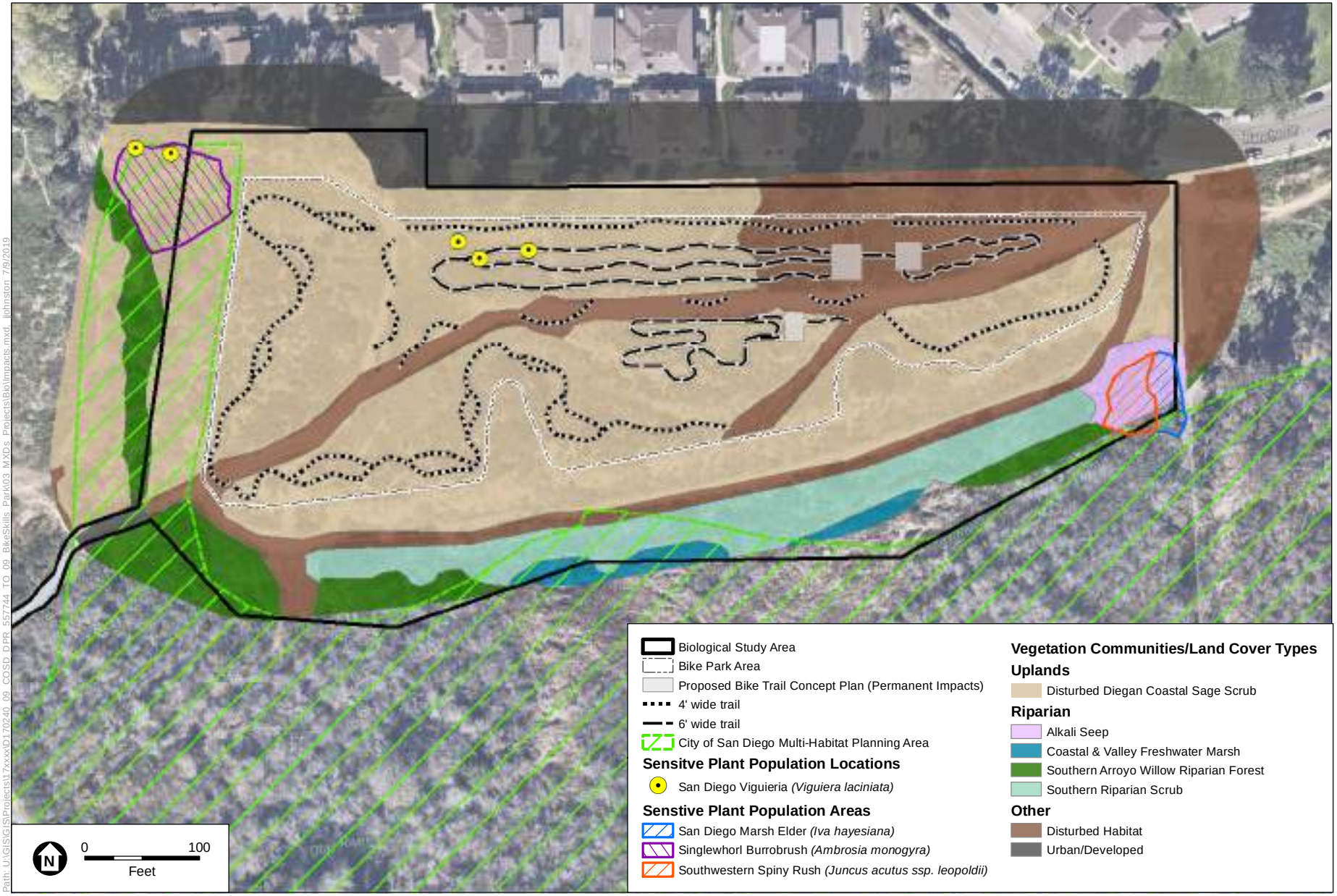
SOURCE: Mapbox; SanGIS 2019

COSD DPR 557744 TO 09 Rios Bike Skills Park

Figure 5

Biological Resources

ESA



SOURCE: Mapbox; SanGIS 2019; Concept Plan V2.0C

COSD DPR 557744 TO 09 Rios Bike Skills Park

Figure 6

Impacts to Biological Resources

ESA