

COASTAL CONSERVANCY

Staff Recommendation

March 14, 2019

**TIJUANA RIVER VALLEY REGIONAL PARK CAMPGROUND**

Project No. 18-058-01

Project Manager: Sam Jenniches

**RECOMMENDED ACTION:** Authorization to disburse up to \$1,890,363 to the County of San Diego to construct the Tijuana River Valley Regional Park Campground in San Diego County and adoption of findings under the California Environmental Quality Act.

**LOCATION:** Tijuana River Valley, San Diego, County of San Diego

**PROGRAM CATEGORY:** Public Access; Lower Cost Coastal Accommodations

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**EXHIBITS**

Exhibit 1: [Project Maps](#)

Exhibit 2: [Project Photos](#)

Exhibit 3: [Project Letters](#)

Exhibit 4: [2019 Mitigated Negative Declaration and the Mitigation Monitoring and Reporting Program for the “Tijuana River Valley Regional Park Campground and Nature Education Center”](#)

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**RESOLUTION AND FINDINGS:**

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31400-31414 of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes the disbursement of an amount not to exceed one million eight hundred ninety thousand and three hundred sixty-three dollars (\$1,890,363) to the County of San Diego (“the grantee”) to implement the Tijuana River Valley Regional Park Campground project in San Diego County (the “project”).

This authorization is subject to the following conditions:

1. Prior to the disbursement of funds, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:
    - a) A detailed work program, schedule, and budget.
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- b) Names and qualifications of any contractors to be retained in carrying out the project.
  - c) A plan for acknowledgement of Conservancy funding.
  - d) Evidence that all permits and approvals required to implement the project have been obtained, including a coastal development permit for the project.
  - e) Evidence that the grantee has adopted a plan to address increased visitation to Border Field State Park and the Tijuana River National Estuarine Research Reserve (TRNERR). This plan shall be developed with the participation of the staffs of the TRNERR and California Department of Parks and Recreation, San Diego Coast District.
2. In implementing the project, grantee shall ensure compliance with all applicable impact avoidance, minimization and mitigation measures and monitoring and reporting requirements for the project identified in (1) the Mitigated Negative Declaration and the Mitigation Monitoring and Reporting Program for the “Tijuana River Valley Regional Park Campground and Nature Education Center Project,” attached to the accompanying staff recommendation as Exhibit 4, and (2) in any permits, approvals or other environmental documentation for the project.
  3. Grantee shall ensure, to the Conservancy's and the California Coastal Commission's satisfaction, that the overnight coastal accommodations developed by this project are lower cost and preserved as such in perpetuity.
  4. In addition, to the extent appropriate, the grantee shall incorporate the guidelines of the Conservancy's ‘Standards and Recommendations for Accessway Location and Development’ and the requirements of all applicable federal and state laws governing barrier-free access for persons with disabilities into the Tijuana River Valley Regional Park Campground project.”

Staff further recommends that the Conservancy adopt the following findings:

“Based on the accompanying staff report and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 9 of Division 21 of the Public Resources Code, section 31400-31410, regarding public access to the coast, and with Chapter 10 of Division 21 of the Public Resources Code, sections 31411-31414, regarding lower cost coastal overnight accommodations.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. The Conservancy has independently reviewed and considered the *Mitigated Negative Declaration and the Mitigation Monitoring and Reporting Program for the Tijuana River Valley Regional Park Campground and Nature Education Center*, adopted by the County of San Diego on January 30, 2019 pursuant to the California Environmental Quality Act (“CEQA”) and attached to the accompanying staff recommendation as Exhibit 4. The Conservancy finds that the proposed project as designed and mitigated avoids, reduces, or mitigates the potentially significant environmental effects to a less-than-significant level, and that there is no substantial evidence based on the record as a whole that the project may have a significant effect on the environment, as defined in 14 Cal. Code Regulations Section 15382.”

**PROJECT SUMMARY:**

Staff recommends that the Conservancy authorize disbursement of up to \$1,885,000 to the County of San Diego (County) to construct the Tijuana River Valley Regional Park Campground in San Diego County. The proposed project consists of construction of a lower cost, multi-use campground, outdoor nature education center, and day-use facilities, all of which that would be available to the general public, overnight campers, school groups and equestrians. The day use facilities will include an equestrian facility with a pasture, corral, and warm up pen. Overnight accommodations will include 25 tent-only sites, 26 multi-use sites, a yurt village of 16 yurts (8 small and 8 large), and 12 equestrian, multi-use campsites with paddocks.

The proposed project locates the campsites, yurts, and outdoor nature education center in the western portion of the site, and equestrian facilities in the eastern portion (see Exhibit 1). An interpretive trail will connect the two areas. The western portion of the project site will contain 67 primitive campsites: multi-use (tent or RV), tent-only sites, large yurts, and small yurts. Two of the large yurts and one of the small yurts will be Americans with Disabilities Act (ADA)-accessible. The yurts are to be situated together in a yurt village layout adjacent to the nature education center. The campsites are primitive in nature, and will not include water or electrical hookups. Campsites and amenity areas will avoid sensitive habitat areas present on site. The San Diego County Department of Parks and Recreation (DPR) will install post and cable fencing to further protect sensitive habitat. Amenities on the western portion of the project site include a building that consists of restrooms and showers for guests. A small portion of the building will also function as a ranger office.

A nature education center is included in the western portion of the project site, and will include an amphitheater for educational programs, nature-based play, and interpretive and wayfinding signage. The signage will interpret the location, the surrounding environment, and its history. The wayfinding signage will identify the location of the project with respect to the California Coastal Trail (CCT) and regional trails. The proposed campground is located on an alignment of the CCT. DPR has been collaborating with partner organizations to provide youth programs at the facility, including Outdoor Outreach, YMCA, San Diego Foundation, San Pasqual Academy and Ocean Discovery Institute. These organizations create experiential programming opportunities for youth to engage with a unique natural environment that is not readily accessible to them. These prospective programs will promote environmental stewardship, and offer a unique connection to nature in the South San Diego Bay area.

The eastern portion of the project site will consist of an equestrian area, featuring a corral, a pasture, warm-up pen, and approximately 12 multi-use campsites with accompanying paddocks. A small restroom facility and a trash enclosure with manure management will be located adjacent to the corral. The manure from the equestrian facilities will be composted on-site following CalRecycle regulation for pathogen reduction (14 CCR § 17868.3). The equestrian facilities will be for day or overnight use, and will not be used for equestrian shows or other large events.

Approximately  $\frac{3}{4}$  of a mile of trails will be developed on the proposed campground site. These trails will connect the western and eastern portions of the campground by way of an interpretive

trail. The trails will also connect the campground to the CCT and the 22.5-mile trail system of Tijuana River Valley Regional Park (TRVRP).

One of the biggest barriers for middle and low-income Californians to accessing and enjoying the coast is the lack of affordable overnight options. Nearly 60% of Californians never spend the night when they visit the coast. For Californians earning less than \$25,000 per year, that figure leaps to 75%.<sup>1</sup> To address this need for lower cost coastal accommodations, in 2017, the California State Legislature passed AB 250 (Gonzalez-Fletcher)<sup>2</sup> to create a Lower Cost Coastal Accommodations program at the Conservancy, which the Conservancy now refers to as its Explore the Coast Overnight Program.

The purpose of the program is to support the development of, and increase accessibility to, lower-cost coastal accommodations in California. Under AB 250's direction, the Conservancy consults with various agencies and organizations, including the California Coastal Commission (CCC) and California Department of Parks and Recreation (CDPR), and has produced an *Explore the Coast Overnight: Expanding Opportunities for All Californians to Stay on the Coast, An Assessment of Lower-Cost Coastal Accommodations* (Assessment) to inform the development of the program.

This project meets many of the goals of the Explore the Coast Overnight program. Coastal camping in San Diego County frequently books out months in advance, presenting difficulty for camping access. The proposed campground would provide a range of lower cost accommodations in the Coastal Zone, and would provide a method of connecting underserved populations with the area's unique coastal ecosystems. The project area is nearby several disadvantaged communities, including the cities of Chula Vista, Imperial Beach and National City and the communities of Nestor and San Ysidro. DPR will also develop a rentable camping equipment program, similar to the FamCamp model utilized by CDPR, which allows visitors with limited prior camping experience or gear to access overnight camping experiences. The campground and day-use facilities will encourage healthy, outdoor physical activities, and exploration of the adjacent 22.5-mile Tijuana River Valley Regional Park trail system that includes a trail connection to the beach, approximately 1.25 miles away.

**Site Description:** The project will be built in the TRVRP. The TRVRP measures approximately 1,800 acres and is located south of the City of Imperial Beach and the southern neighborhoods of the City of San Diego, and just north of the Border Highlands and the international border. Located west of Interstate 5, the park is entirely within the coastal zone, and adjoins Border Field State Park and Tijuana River National Estuarine Research Reserve (TRNERR) on the west. Though degraded by human activity, the Tijuana River Valley's natural resources are among the most valued in San Diego County, largely because of the contiguous assemblage of habitats that extend east from the beach to the urban areas along Interstate 5. Among these habitats are sand dune, saltmarsh, riparian lowlands, and coastal sage scrub upland. With much of the region's endemic habitat lost, each of the remnant habitats that exist in the valley are rare, and support

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<sup>1</sup> State Coastal Conservancy, (2019). *Explore the Coast Overnight: Expanding Opportunities for All Californians to Stay on the Coast, An Assessment of Lower-Cost Coastal Accommodations*. <http://scc.ca.gov/projects/explore-the-coast-overnight/>

<sup>2</sup> Codified as Public Resources Code Sections 31411-31414.

numerous state and federal listed plants, birds, insects, and reptiles. Extensive urban development has occurred in southwestern San Diego County, promising to bring a large increase in use of the Tijuana River Valley public lands.

The County has acquired over 1,700 acres for the development of the TRVRP. The park features over 22-miles of trails, an equestrian center, and active recreation complex and community park amenities. The project area is included in the Multiple Species Conservation Program (MSCP) Subarea Plan adopted by the City of San Diego in the context of the county-wide Natural Community Conservation Plan (NCCP). DPR, CDP and the United States Fish and Wildlife Service are responsible for the management of habitat and access on the public lands of the Tijuana River Valley and Estuary. This project is located at the intersection of TRVRP, the TRNERR and Border Field State Park, and will expand access to the parks and preserve. The County, in collaboration with TRNERR, will develop a plan to address potential increased visitation to these neighboring parks and preserves.

The proposed project would be within a 76-acre site comprised of two parcels (APNs 662-020-120-0 and 663-010-450-0) near the western boundary of TRVRP, just east of Border Field State Park, approximately 1.2 miles east of the ocean. The developed footprint of the project would occupy 17.4 acres of the 76-acre project area. Historically, this site was in agricultural production; however, riparian habitat, coastal scrub, and patches of nonnative invasive vegetation have appeared. There are remnant patches of disturbed coastal sage scrub, disturbed mule fat scrub and disturbed southern willow scrub that provide habitat for numerous species. The majority of the habitat at the project area is considered disturbed habitat.

**Grantee Qualifications:** DPR maintains and enhances the quality of life in San Diego County by providing parks and recreational opportunities for residents and visitors. Their award-winning parks system includes local and regional parks, campgrounds, 300 miles of trails, fishing lakes, state-of-the-art recreation centers and sports complexes, ecological preserves, and open space preserves. This park system is the legacy of many successful individual projects implemented through collaboration with local, state and federal partners. The County is uniquely qualified to undertake this project as the agency with jurisdiction over the TRVRP, and a history of completing similar projects within their parks system.

**Project History:** In 2003, the Conservancy authorized a grant of \$1,000,000 to DPR to design and evaluate the environmental benefits and impacts of an integrated program of habitat restoration and public access improvements in the 1,800-acre TRVRP. The County used the Conservancy grant to complete the detailed planning needed to set the stage for fully restoring the valuable habitat. The County worked in close consultation with the parties involved in the MSCP, including the City of San Diego, and state and federal resource and regulatory agencies, as well as other stakeholders. The County also identified alignments for the Coastal Trail, the inland linkage to the coast, and other park trails that would best serve recreational uses while also protecting wildlife habitat. The County approved the “Tijuana River Valley Regional Park Trails and Habitat Enhancement Plan & Final Environmental Impact Report” in December 2006, and is implementing the plan over the next several years

Subsequently, the Conservancy authorized grants in May of 2012 and February of 2013, totaling \$1,950,000, for the construction of trails as part of the Tijuana River Valley Trail System. These trails were completed in 2015 and, along with other trail projects in the TRVRP, resulted in the completion of all valley bottom trails proposed in the TRVRP. In 2014, the Conservancy

authorized a grant of \$100,000 to the County to develop a public use feasibility study for other potential visitor-serving uses and amenities not addressed in the 2003 TRVRP Trails and Habitat Enhancement Project Environmental Impact Report.

The development of the current project arose out of the 2014 feasibility study and the County's desire to create lower cost accommodations near or within the TRVRP. The feasibility study identified the campground as the highest priority visitor-serving project for the County. The Conservancy has been an integral partner for projects within the Tijuana River Valley for more than 30 years, ranging from acquisition, to habitat restoration, to public access.

**PROJECT FINANCING**

<b>Coastal Conservancy</b>	<b>\$1,890,363</b>
CA State Office of Grants and Local Services	\$1,590,000
County of San Diego	\$5,850,000
<b>Project Total</b>	<b>\$9,330,363</b>

The expected source of Conservancy funds is the Conservancy's Coastal Trust Fund, which was established under Public Resources Code (PRC) Section 31012 to hold funds paid to the Conservancy for specific purposes. The funds anticipated to be used for this project originate from in-lieu fees (*i.e.*, mitigation fees) that were paid to the Conservancy pursuant to the conditions of two Coastal Development Permits (Coastal Development Permit No. A-6-COR-08-98 & 99, and Coastal Development Permit No. 6-13-0407) for development in southern San Diego County that included high cost overnight visitor accommodations. The permits required the developers to pay the in-lieu fees for the purpose of establishing lower cost overnight accommodations, such as new hostel beds, tent campsites, cabins or campground units, within the coastal area of San Diego. The permits also require that the overnight accommodations constructed with the in-lieu fees be preserved as lower cost in perpetuity.

The Conservancy's receipt and disbursement of the in-lieu fees is governed by two memoranda of agreement (MOA) with the CCC, one for each permit. The MOAs require the CCC to determine that a project is eligible for funding from the in-lieu fees. The CCC has deemed this project to be an eligible use for these in-lieu fees. The MOAs also require the Conservancy to use the fees consistent with the conditions of the permits. The proposed project is consistent with the conditions of the two permits because it will create 79 new lower cost overnight accommodations, in the form of campsites and yurts, in the coastal area of south San Diego County.

In addition to matching funds from the CA State Office of Grants and Local Services and the County, DPR will be matching the Conservancy contributions with approximately \$100,000 of in-kind contribution from DPR's Comprehensive Tree Program. The Comprehensive Tree Program will provide in-kind trees, native shrubs, and other landscaping needs to provide a natural experience at the campground.

**CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:**

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The proposed project is consistent with Chapter 9 of Division 21 of the Public Resources Code, Sections 31400-31410. Pursuant to PRC Sections 31400.1 and 31400.3, the Conservancy may grant funds to a public agency to develop and operate land for public access purposes, as long as the project will serve a greater than local need. The project, which is located in Tijuana River Valley Regional Park, will develop a campground to provide greater public access to and along the coast, and serves as a key coastal access opportunity for southern San Diego County. In addition, the adjacent Tijuana River National Estuarine Research Reserve is a “Wetland of International Importance,” as designated by the Ramsar Convention on Wetlands, and is a major tourist destination serving visitors from regional, state and international origins.

The proposed project is also consistent with Chapter 10 of Division 21 of the Public Resources Code, Sections 31411-31414. Pursuant to PRC Section 31412(a), the Conservancy may award grants and undertake projects as part of its Lower Cost Coastal Accommodations Program (Explore the Coast Overnight) to facilitate the development of new, lower cost accommodations within one and one half miles of the coast. The proposed project will develop 79 new, lower cost accommodations within one and one half miles of the coast.

The proposed project meets the PRC Section 31412(b)(2) program goal that new accommodation projects be accessible to low-income and middle-income families, and to nonprofit organizations and public entities that provide educational and recreational opportunities. The proposed project meets this goal in part through its close proximity to several disadvantaged communities as described in the “Project Summary” section above. In addition, DPR will develop a rentable camping equipment program, which will make the campground accessible to low-income and middle-income families. Finally, DPR has been collaborating with partner organizations to provide youth programs at the campsite, including Outdoor Outreach, YMCA, San Diego Foundation, San Pasqual Academy and Ocean Discovery Institute.

The Conservancy shall be guided by the Assessment pursuant to Section 31413. The proposed project will provide a variety of camping options at the San Diego coast, a location identified in the Assessment as having a low concentration of lower cost, coastal accommodations in a county with a very high occupancy rate for coastal accommodations.

**CONSISTENCY WITH CONSERVANCY’S ACCESS PROGRAM STANDARDS:**

**Standard No. 1, Protect Public and Coastal Resources:** The proposed project is designed and located to minimize alteration of the natural landforms and to protect environmentally sensitive habitats by constructing access improvements around habitat areas.

**Standard No. 5, Environmentally Sensitive Areas:** The proposed project is designed to protect environmentally sensitive habitats by locating and constructing access improvements in disturbed habitat. Sensitive habitats on site will be incorporated into a Multi-Habitat Protection Area (MHPA).

**Standard No. 8, Trails:** The proposed project will involve the creation of approximately ¾ miles of trail that will connect to the California Coastal Trail and the coast, as well as the regional trail system.

**Standard No. 12, Support Facilities:** The proposed campground will provide a support facility that will increase use of the California Coastal Trail and associated accessways. Additionally, the proposed project will include interpretive and directional signage that will enhance use of the California Coastal Trail and associated accessways.

**Standard No. 13, Barrier-Free Access:** The proposed project will create ADA accessways and will include ADA facilities as described in the “Project Summary” section above.

**CONSISTENCY WITH CONSERVANCY’S [2018-2022 STRATEGIC PLAN](#)  
GOAL(S) & OBJECTIVE(S):**

Consistent with **Goal 1, Objective A** of the Conservancy’s 2018-2022 Strategic Plan, the proposed project will promote awareness and use of the California Coastal Trail.

Consistent with **Goal 2, Objective A** of the Conservancy’s 2018-2022 Strategic Plan, the proposed project will expand or enhance opportunities for access for people with disabilities to and along the coast and coastal trails.

Consistent with **Goal 2, Objective D** of the Conservancy’s 2018-2022 Strategic Plan, the proposed project will fund construction of new facilities to increase and enhance coastal recreational opportunities and enable people to enjoy natural, cultural, and historical resources.

Consistent with **Goal 3, Objective E** of the Conservancy’s 2018-2022 Strategic Plan, the proposed project will create a variety of lower-cost overnight camping accommodations along the coast. The proposed project will create 79 campsites, including a mix of multi-use, and walk-in campsites, large and small yurts, and equestrian campsites.

Consistent with **Goal 4, Objective B** of the Conservancy’s 2018-2022 Strategic Plan, the proposed project will support the design and installation of interpretive or educational displays and exhibits related to coastal, watershed, and ocean-resource education, maritime history, and climate-change.

Consistent with **Goal 16, Objective A** of the Conservancy’s 2018-2022 Strategic Plan, the proposed project will involve the Conservancy funding a project that will directly benefit disadvantaged communities.

Consistent with **Goal 16, Objective C** of the Conservancy’s 2018-2022 Strategic Plan, the proposed project will increase coastal access for all Californians, by supporting organizations that provide coastal experiences to underserved populations, by increasing physical access for persons with disabilities, by providing information about visitor-serving amenities on the coast, and by reducing barriers such as the cost of lodging.

**CONSISTENCY WITH CONSERVANCY’S  
PROJECT SELECTION CRITERIA & GUIDELINES:**

The proposed project is consistent with the Conservancy’s Project Selection Criteria and Guidelines, last updated on October 2, 2014, in the following respects:

**Required Criteria**

1. **Promotion of the Conservancy’s statutory programs and purposes:** See the “Consistency with Conservancy’s Enabling Legislation” section above.
2. **Consistency with purposes of the funding source:** See the “Project Financing” section

above.

3. **Promotion and implementation of state plans and policies:**

Consistent with **Goal 3: Steward and Protect Natural and Working Landscapes of “California @ 50 Million: The Environmental Goals and Policy Report,”** the proposed project will feature a space for a nature education center for families and school/youth groups, including disadvantaged youth. The nature education programs and events will result in a greater awareness of nature, the unique ecosystems of the Tijuana River Valley and the human connection to the environment. Programs will promote environmental stewardship and offer a unique connection to nature in the South Bay.

Consistent with **Goal 6: Create linkages to other trail systems and to units of the State Park system, and use the Coastal Trail system to increase accessibility to coastal resources from urban population centers,** of “Completing the California Coastal Trail,” the proposed project will contribute support facilities to enhance accessibility and use of the California Coastal Trail and associated accessways. The proposed project will also create approximately ½ mile of trails that will connect to the regional trail system.

4. **Support of the public:** The project is supported by the San Diego County Board of Supervisors (pending) and the Department of Environmental Health (see Exhibit 3).
5. **Location:** The proposed project would be located within the coastal zone of the City of San Diego.
6. **Need:** Without funding from the Conservancy, the County of San Diego would continue to seek funding to complete the project. However, the project would be delayed, possibly jeopardizing other funding sources.
7. **Greater-than-local interest:** The Tijuana River Estuary is a Ramsar Designated Wetland of International Significance and garners visitation from around the world. The proposed project would provide much needed lower cost coastal accommodations for local, regional, state and international visitors.
8. **Sea level rise vulnerability:** The elevation of the site is anticipated to be above the 2050 and 2100 sea level rise predictions based on the *Surging Seas Risk Zone Model*. Most impacts from sea level rise will be experienced at the Tijuana River estuary, approximately 1 mile from the proposed project.

**Additional Criteria**

9. **Urgency:** The previously awarded CA Office of Grants and Local Services funding of \$1,590,000 requires funding to be expended and campground to be open to the public by June 2020.
10. **Leverage:** See the “Project Financing” section above.
11. **Readiness:** The grantee is ready to implement the project.
12. **Realization of prior Conservancy goals:** “See “Project History” above.”

**CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:**

The proposed project is consistent with the goals and objectives of the *Tijuana River Valley Local Coastal Program Land Use Plan (1999)*. The project would expand active recreational opportunities for users in the portion of the project area designated as “Other Community Open Space and Agriculture,” while providing for the preservation of natural resources. The proposed project is adjacent land defined in the City of San Diego’s *Multiple Species Conservation Program Sub Area Plan (1997)*, and is consistent with the plan’s “Land Use Adjacency Guidelines.” The proposed project is also consistent with the plan’s “Specific Management Policies and Directives for the Tijuana River Valley” regarding compatible recreational use.

**CEQA COMPLIANCE:**

Staff has independently reviewed and considered the Mitigated Negative Declaration and the Mitigation Monitoring and Reporting Program for the “Tijuana River Valley Regional Park Campground and Nature Education Center” adopted by the County of San Diego on January 30, 2019 pursuant to the California Environmental Quality Act (“CEQA”) (see Exhibit 4). Staff concurs that the proposed project, as designed and mitigated, avoids, reduces, or mitigates the potentially significant environmental effects to a less-than-significant level, and that there is no substantial evidence based on the record as a whole that the Project may have a significant effect on the environment, as defined in 14 Cal. Code Regulations Section 15382.

The following summarizes the potentially significant impacts of the project, and the measures that the grantee plans to implement to avoid, minimize or mitigate those impacts to a less than significant level.

**Biological Resources**

MM-BIO-01: Clearing Restrictions. To mitigate for potentially significant impacts on sensitive nesting birds and raptors, the County will avoid vegetation removal or ground-disturbing activities during the bird breeding season to keep the project in compliance with state and federal regulations regarding nesting birds (i.e., the federal Migratory Bird Treaty Act [MBTA] and California Fish and Game Code [CFGC]).

MM-BIO-02: Biological Monitoring. The County will retain a qualified biologist to conduct biological monitoring during project construction.

MM-BIO-03: Best Management Practices (BMPs): To reduce and avoid indirect impacts from the project construction, the County will implement BMPs for construction vehicles and appropriate stormwater BMPs will be developed for rainy season construction.

MM-BIO-04: Manure Management: To reduce indirect impacts from increased equestrian use of the project area, the County will implement a manure management program for the project. Manure will be periodically removed from the corral and pasture areas. Manure will be

composted on site following the CalRecycle regulation for pathogen reduction (14 CCR § 17868.3), and raw manure will not be spread on site.

### **Cultural Resources**

MM-CUL-01: Archaeological Monitoring. The County Department of Parks and Recreation (DPR) will retain a qualified archaeologist to monitor all proposed ground-disturbing activities related to the implementation of the proposed project in order to minimize disturbance of subsurface archaeological deposits.

MM-CUL-02: 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.

### **Geology and Soils**

MM-GEO-01: Comply with Recommendations of Geotechnical Evaluation. The project will comply with the recommendations of the Geotechnical Evaluation. Remedial grading will be performed within structural building areas.

### **Hazards and Hazardous Materials**

MM-HAZ-01: Federal Aviation Administration (FAA) Height Notification. The County will complete and submit the FAA Form 7460-1 Notice of Proposed Construction or Alteration application to the FAA for review. If the FAA concludes the project would not be an airspace obstruction or hazard, no further action would be required. If the FAA determines there would be a potential airspace obstruction or hazard, the project component(s) that has/have been identified as an obstruction or hazard will be modified to the satisfaction of the FAA.

MM-HAZ-02: Review by the San Diego County Regional Airport Authority. The project will be submitted to the San Diego County Regional Airport Authority. If the San Diego County Regional Airport Authority does not find the proposed project to be compatible with the NOLF-Imperial Beach Airport Land Use Compatibility Plan (ALUCP), the project component(s) found to be incompatible with the NOLF-Imperial Beach ALUCP will be modified to the satisfaction of the San Diego County Regional Airport Authority.

### **Transportation and Traffic**

MM-TRA-01: Prepare Traffic Control Plan and Submit Permit Form to City of San Diego. Prior to construction, a traffic control plan will be prepared for the project in accordance with the latest edition of the City of San Diego Standard Drawings, Appendix A: The Manual of Uniform Traffic Control Devices and the California Supplement; and Standard Specifications for Public Works Construction, including Regional Supplement Amendments and City of San Diego

Supplement Amendments.

MM-TRA-02: Vegetation Maintenance. Following construction of the proposed project but prior to opening, DPR will remove or trim the vegetation that currently obstructs the sight distance associated with the driveway along the north side of Monument Road. The vegetation will be removed or trimmed so that the sight distance meets Caltrans requirements, as documented in the Caltrans Highway Design Manual (2016).

**Tribal Cultural Resources**

MM-TCR-01: Native American Monitoring. DPR will retain a Kumeyaay tribal member to monitor all project-related ground disturbance.

Upon approval of the project, Conservancy staff will file a Notice of Determination.