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DATE: October 2, 2023

RE: Karve Ski Park – Vehicle Miles Traveled Analysis

The purpose of this memorandum is to document the results of the Vehicle Miles Traveled (VMT) Analysis conducted for the Karve Ski Park project (the "Project").

Project Description

The Project proposes to develop a 10.15 acres synthetic ski park (also known as a dry ski slope) located at 26351 N Center City Parkway within San Diego County. The ski park will be an outdoor, year-round synthetic snow sports facility and recreational park catering to all ages, abilities, and skill levels. The primary activities will be the ones that take place at the artificial ski slope which mimics the attributes of snow for both day and nighttime skiing and snowboarding.

The Project's hours of operation are anticipated to be as follows:

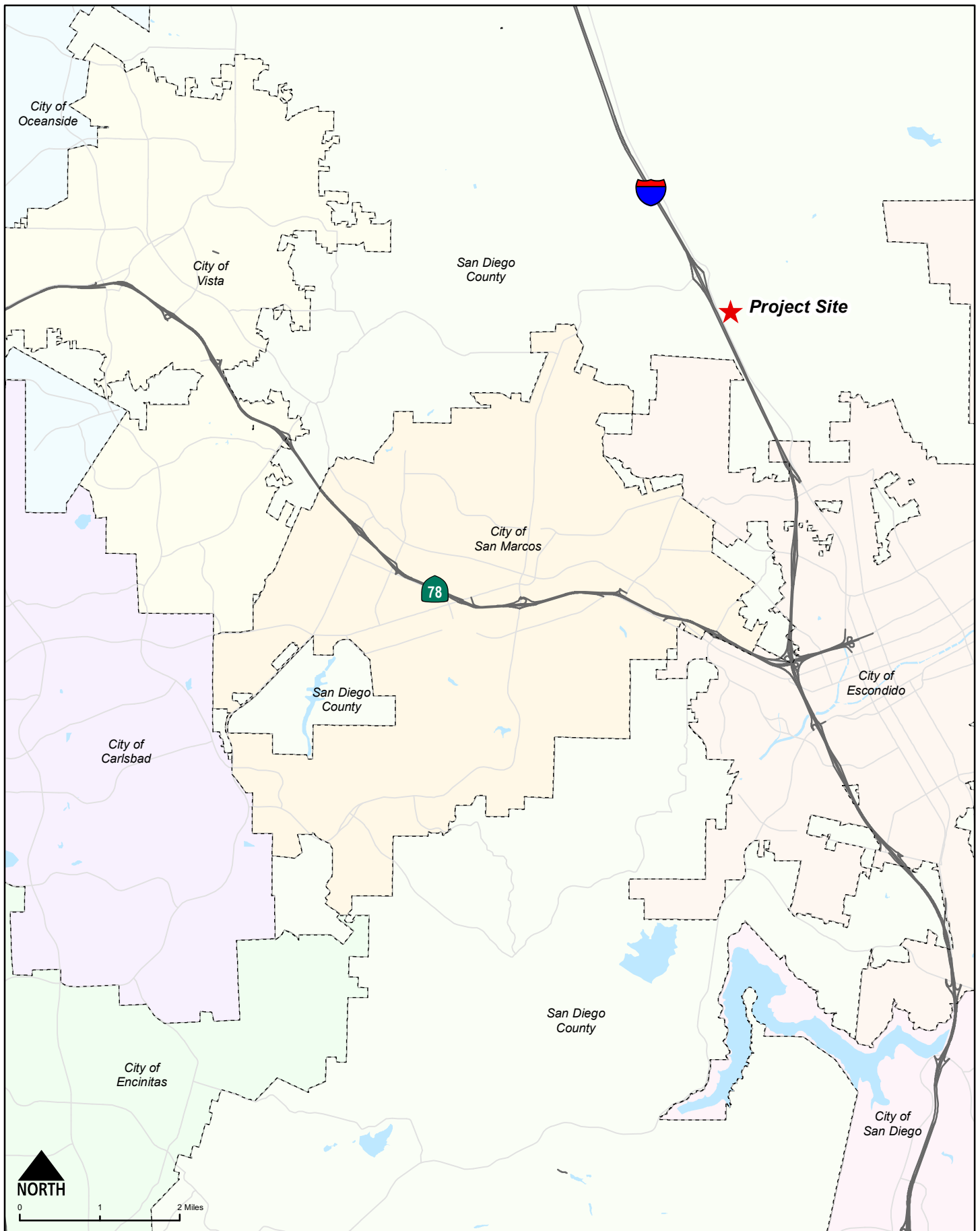
- Monday – Thursday: 9 AM to 10 PM
- Friday: 8 AM – 10 AM – Golf Driving Range
- Friday: 9 AM to 11 PM
- Saturday: 8 AM to 11 PM
- Sunday: 8 AM to 10 PM

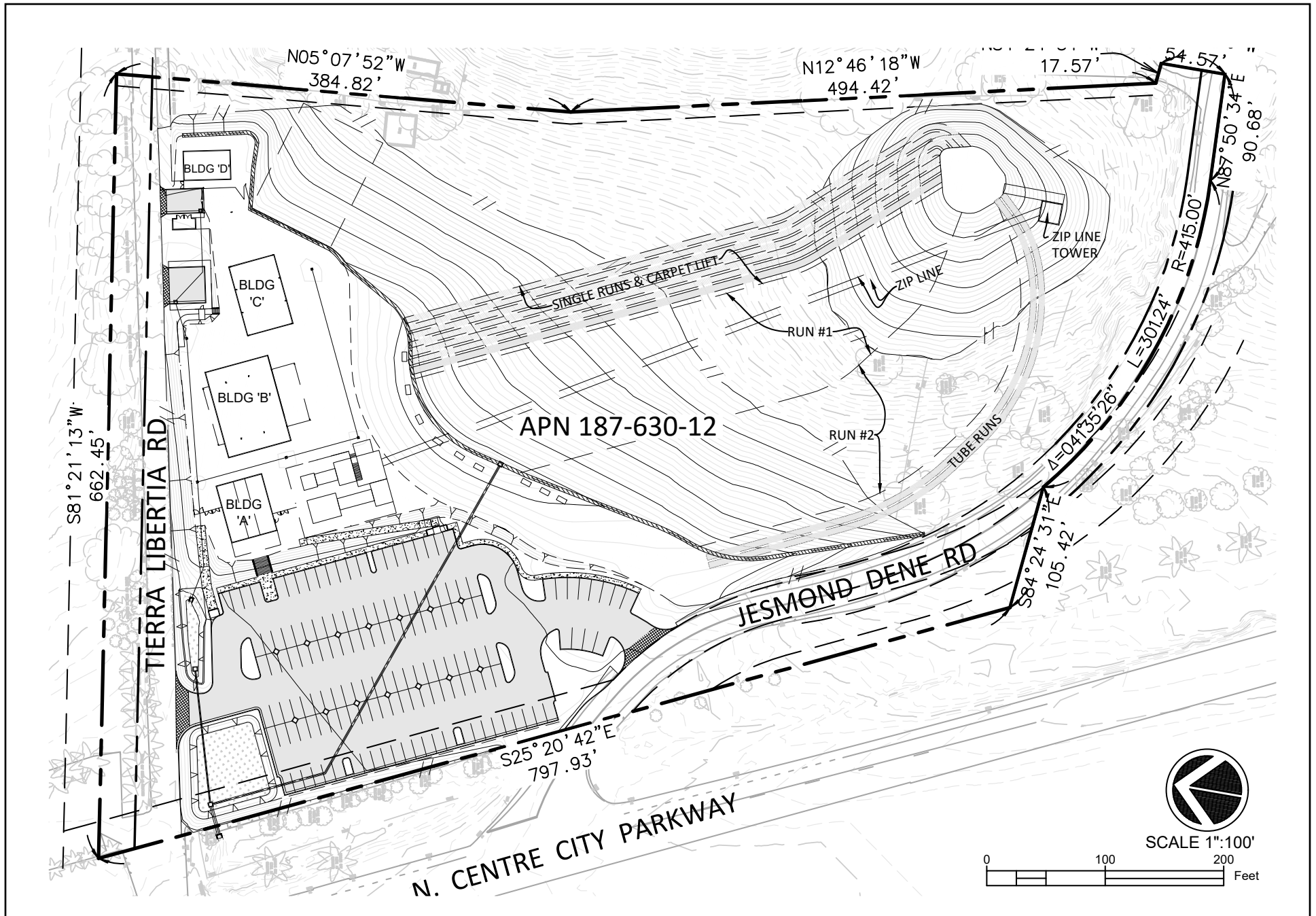
The activities allowed and facilities available at the site are listed below:

- 147 parking space parking lot (including 6 EV charging spaces, 5 ADA compliant, and 11 clean air vehicle spaces)
- Skiing, Snowboarding, and Tubing
- Ziplining (Two zipline towers)
- Golf Driving Range (9 tee boxes)
- Village Area Amenities/Services – Four buildings totaling 9,525 square feet:
 - Building A – 2,000 square-foot building including Box Office and Guest Services, and First Aid and Management Office
 - Building B – 4,125 square-foot building including Pavilion with food and bar with seating indoor and outdoor; Restrooms including large ADA-compliant restrooms.
 - Building C – 2,400 square-foot building with Equipment rental and Event rooms (4) for groups. Each event room accommodates 20-30 guests.
 - Building D – 1,000 square-foot building including maintenance and storage space.
- Outdoor Patio – surrounding the Pavilion and will provide additional seating and serve as an observation area. There will also be space for two (2) food trucks at the rear of Building C.
- Tot Lot

The Project proposes to sell lift tickets on a 2.5- hour time slot basis and will have a maximum capacity of 100 lift tickets per time-slot. The lift operation and ski slope will be the primary land use, whereas the remaining land uses such as the jump towers and zipline are amenities for guests to use while they wait for their turn at the lift. This type of land use arrangement (primary land uses with supporting activities) is similar to other active sports park within North County such as GoCart Racing, Ice Skating, Bowling, and Paintball Parks.

Figure 1 displays the Project's regional location. **Figure 2** displays the Project's site plan.





Analysis Methodology

The VMT analysis for the Project was conducted following the County TSG as well as in accordance with CEQA Statutes and Guidelines. Land development projects within the County of San Diego are required to conduct a detailed transportation VMT analysis for each land use component of the project¹, unless the project is presumed to have a less than significant impact based on Table 1 of the County TSG. The screening approach is consistent with those provided in the California Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA². Table 1 displays the County TSG screening criteria.

Table 1 - VMT Screening Criteria

Screening Criteria	
1. Projects Located in VMT Efficient Areas Based on Regional Average	<ul style="list-style-type: none"> Region being defined by OPR as the MPO/RTPA geographical boundary Use location-based screening maps (consistent with project land uses)
2. Projects Located in Infill Village Areas	<ul style="list-style-type: none"> Use location-based screening maps VMT Screening Criteria for Infill Areas (see County TSG Appendix D)
3. Small Residential and Employment Projects	<ul style="list-style-type: none"> Projects that generate less than 110 average daily trips (trips based on the number of vehicles trips after any alternative modes/location-based adjustments applied)
4. Locally Serving Retail Projects	<ul style="list-style-type: none"> Projects that are 50,000 square feet or less
5. Locally Serving Public Facilities	<ul style="list-style-type: none"> Public facilities that serve the local community including transit centers, public schools, libraries, post office, park-and-ride lots, other government offices, parks/trail heads, emergency shelters, and passive public uses.
6. Redevelopment Projects with Lower Total VMT	<ul style="list-style-type: none"> The proposed project's total daily project VMT is less than the existing land use's total daily VMT
7. Affordable Housing	<ul style="list-style-type: none"> 100% affordable housing

Source: County TSG (2022)

Project or parts of a project that do not meet screening requirements are required to conduct a detailed transportation VMT analysis.

¹ Both the County TSG and the OPR Technical Advisory stated that land uses within a mixed-use development should be analyze separately to determine the impact of each land use type.

² https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

VMT Analysis Procedures and Threshold of Significance

The County TSG provides the following guidance on how to conduct transportation VMT analysis based on the project type and number of driveway trips, as well as the threshold where a project is considered to have a significant transportation related impact. **Table 2** displays a summary of the guidance for the different project types.

Table 2 - Summary of VMT Analysis Approach and Significance Thresholds

Project Type	Approach		Threshold of Significance
Residential, Employment, or Mixed-Use	Less than 2,400 un-adjusted driveway trips	Greater than 2,400 un-adjusted driveway trips	15 percent (15%) below the Regional Average VMT per Resident
Non-Locally Serving Retail/Service, Public Facility, or Other	N/A	All Projects	A net change in total regional VMT

Because the proposed Project is a non- residential/employment project, per the County TSG (p. 25), the project shall conduct a VMT analysis by calculating the change to area VMT using the SANDAG Travel Demand Model. However, due to the unique land use of the proposed Project and based on the County TSG (p. 26), applicants may also consider the use of other methods for unique land-use project types, that are not captured through the SANDAG Travel Demand Model for analyzing VMT. Therefore, the VMT analysis for the proposed project is based on a qualitative analysis further discussed and further explained in a subsequent section of this report.

VMT Reduction and Mitigation Measures

Projects that have a significant VMT related impact would be required to mitigate their impact, this is done by reducing the number of automobile trips generated by the project and reducing the distance that people drive to the project site. VMT reductions are generally achieved through changes in a project's site design or the application of on-site measures and strategies designed to incentivize, or require, users to take alternate forms or transportation in-lieu of single occupancy vehicles. This approach is otherwise known as Transportation Demand Management (TDM). The project would quantify the measure of effectiveness of each TDM measures by using the calculation/method outline in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing GHG Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (GHG Handbook), December 20213.

³ https://www.caleemod.com/documents/handbook/full_handbook.pdf

VMT Analysis and Mitigation

This chapter discusses the VMT generated by the Proposed Project and whether the Proposed Project would result in a VMT impact based on the thresholds outlined above and provides recommendations for mitigation measures to reduce or mitigate identified VMT impacts.

VMT Analysis

In accordance with the County TSG, the Project's land use was evaluated against the screening criteria provided in the County TSG. The Project's land use is an active sports land use, which resembles of an outdoor recreational space, such as paintball parks, shooting ranges, sport fields, or the following businesses located within northern San Diego County: (GoCart Racing, Ice Skating, Bowling, Paintball Parks, Boomers, shooting ranges). Therefore, a qualitative analysis is provided below.

Based on the Project's proposed land uses, the Project is anticipated to attract two types of clientele. The first set of clientele includes those who are beginners that would like to improve their skills by practicing and taking lessons. For these clienteles, the only option for snow sports practices would be Adventure Ski in the City of Encinitas, all other ski destinations are located hundreds of miles away in places such as Big Bear (San Bernardino County, approximately 145 miles away), Mammoth Lakes (400 miles away), and Lake Tahoe (Placer County, approximately 500 miles away). In this case, clients in eastern North County would have another option to practice their skills. Specifically, clients located in the City of San Marcos, City of Escondido, and the eastern part of North County would have access to a facility that is closer to their homes. As such, these clients would likely travel to Karve Ski Park, which is closer (less driving distance), and reduce their overall VMT.

While a "regional recreational facility" category is not included in the County TSG or OPR's Technical Advisory screening criteria, the technical advisory does state the following for local serving land uses, such as local serving retail:

"Because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project's transportation impacts. By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact."

Similar to local serving retail, the project would redistribute regional trips rather than create new trips and in general shorten the longer trips to regional facilities. As such, the Project is anticipated to shorten trips made by San Diego County residents associated with skiing by largely internalizing these trips within San Diego County. In other words, the Project would shorten and reduce VMT by providing a ski facility within San Diego County and shortening the typical trips to farther, larger ski parks. Reduction in VMT helps the County of San Diego to achieve its long-term climate goals of reducing GHG emissions.

According to Section 15064.3 “Determining the Significance of Transportation Impacts” of the 2021 CEQA Statute & Guidelines, projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less-than-significant transportation impact. Therefore, since the Project will reduce VMT within San Diego County, **the Project is presumed to have a less than significant VMT impact.**