



VINCE NICOLETTI
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 210, SAN DIEGO, CALIFORNIA 92123
(858) 505-6445 General • (858) 694-2705 Codes Compliance
(858) 565-5920 Building Services

TYLER FARMER
ASSISTANT DIRECTOR

MITIGATED NEGATIVE DECLARATION

PROJECT NAME: Karve Ski Park Major Use Permit

RECORD ID: PDS2023-MUP-23-009

ENVIRONMENTAL LOG NO.: PDS2023-ER-23-08-008

**This Document is Considered Draft Until it is Adopted by the Appropriate
County of San Diego Decision-Making Body.**

This Mitigated Negative Declaration is comprised of this form along with the Environmental Initial Study that includes the following:

- a. Initial Study Form
 - b. Environmental Analysis Form and attached extended studies for the project
1. California Environmental Quality Act Negative Declaration Findings:

Find, that this Mitigated Negative Declaration reflects the decision-making body's independent judgment and analysis, and; that the decision-making body has reviewed and considered the information contained in this Mitigated Negative Declaration and the comments received during the public review period; and that revisions in the project plans or proposals made by or agreed to by the project applicant would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and, on the basis of the whole record before the decision-making body (including this Mitigated Negative Declaration) that there is no substantial evidence that the project as revised will have a significant effect on the environment.

2. Required Mitigation Measures:

Refer to the attached Environmental Initial Study for the rationale for requiring the following measures:

CUL- 1 - ARCHAEOLOGICAL AND TRIBAL MONITORING PROGRAM

INTENT: In order to mitigate for potential impacts to undiscovered buried archaeological resources and human remains, an Archaeological and Tribal Monitoring Program and potential Data Recovery Program shall be implemented pursuant to the County of San Diego Guidelines

for Determining Significance for Cultural Resources and the California Environmental Quality Act (CEQA).

DESCRIPTION OF REQUIREMENT:**A. Pre-Construction**

1. Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before, during, and after construction.
2. Pre-construction meeting to be attended by the Project Archaeologist and Luiseño Native American monitor to explain the monitoring requirements.

B. Construction

1. Monitoring. Both the Project Archaeologist and Luiseño Native American monitor are to be on-site during earth-disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Luiseño Native American monitor. Both the Project Archaeologist and Luiseño Native American monitor will evaluate fill soils to ensure that they are negative for cultural resources.
2. If cultural resources are identified:
 - a. Both the Project Archaeologist and Luiseño Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
 - b. The Project Archaeologist shall contact the County Archaeologist, and culturally-affiliated tribes as identified in the Treatment Agreement and Preservation Plan at the time of discovery.
 - c. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the project archaeologist, tribal monitor(s), and the tribal representative(s) to discuss the significance of the find. Optionally, the County Archaeologist may attend the meeting to discuss the significance of the find.
 - d. Construction activities shall not resume in the area of discovery until an agreement has been reached by all parties as to appropriate mitigation. Work shall be allowed to continue outside of the buffer area and shall be monitored.
 - e. Isolates and non-significant deposits shall be minimally documented in the field. The isolates and/or non-significant deposits shall be reburied on-site as identified in the Treatment Agreement and Preservation Plan.

- f. Treatment and avoidance of the newly discovered resources shall be consistent with the Treatment Agreement and Preservation Plan entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils, and/or reburial on the Project property so they are not subject to further disturbance in perpetuity.
- g. If cultural resources are identified, one or more of the following treatments, in order of preference, shall be employed:
 - i. Preservation in place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in place where they were found with no development affecting the integrity of the resources.
 - ii. Reburial of the resources on the project property. The measures for reburial shall include, at least, the following:
 - I. Measures and provisions to protect the future reburial area from any impacts in perpetuity.
 - II. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with the exception that sacred items, burial goods, and Native American human remains are excluded.
 - III. Any reburial process shall be culturally appropriate.
 - IV. Listing of contents and location of the reburial shall be included in the confidential appendix of the Monitoring Report.
 - V. The Monitoring Report shall be filed with the County under a confidential cover and is not subject to Public Records requests.
- 3. If preservation in place or reburial is not feasible, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Tribe, and the Luiseño Native American Monitor and approved by the County Archaeologist prior to implementation. There shall be no destructive or invasive testing on sacred items, burial goods, and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Monitoring Report. Pursuant to Calif. Pub. Res. Code § 21083.2(b), avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the Planning & Development Services Director for decision. The Planning & Development Services Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources,

and recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe.

4. Human Remains.

- a. The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
- b. Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken off-site for evaluation, they shall be accompanied by the Luiseño Native American monitor.
- c. If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
- d. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
- e. The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
- f. Public Resources Code §5097.98, CEQA §15064.5, and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

5. Tribal Cultural Resources: If tribal cultural resources are discovered, the Project Archaeologist shall conduct consultation with culturally-affiliated tribes to determine the most appropriate mitigation. Should the two parties not be able to reach consensus, then the County Archaeologist shall consider the concerns of the culturally-affiliated tribe and the Project Archaeologist, and the Director of Planning & Development Services shall make a final decision regarding appropriate mitigation.

6. Fill Soils

- a. The Project Archaeologist and Luiseño Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.

C. Rough Grading

1. Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared, identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe that requests a copy.

D. Final Grading

1. Final Report. A final report shall be prepared, substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center, and any culturally-affiliated tribe that requests a copy.
2. Cultural Material Conveyance
 - a. The final report shall include evidence that all Native American cultural materials in order of preference have been conveyed as follows:
 - i. Evidence that all prehistoric materials collected during the archaeological monitoring program have been reburied.
 - or
 - ii. Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.
 - b. The final report shall include evidence that all historic materials have been curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

DOCUMENTATION: The applicant shall provide a copy of the Treatment Agreement and Preservation Plan, the Monitoring Report, and Final Report to [PDS, PPD].

TIMING: Prior to approval of any grading and/or improvement plans and issuance of any Grading or Construction Permits.

MONITORING: Both the Project Archaeologist and Luiseño Native American monitor are to be on-site during earth-disturbing activities to ensure the requirements of this measure are fulfilled.

NOI-1 – CONSTRUCTION NOISE MANAGEMENT PLAN

INTENT: In order to mitigate for potential construction noise impacts at properties in the project vicinity, a Construction Noise Management Plan shall be implemented pursuant to the County of San Diego Code of Regulatory Ordinances and CEQA.

DESCRIPTION OF REQUIREMENT: Noise levels from project-related construction activities shall not exceed the noise limit specified in Section 36.409 of the County of San Diego Code of Regulatory Ordinances of 75 A-weighted decibel (dBA) L_{EQ} (8-hour equivalent continuous sound level), when measured at the boundary line of the property where the noise is located or any occupied property where noise is being received. A Construction Management Plan that describes the measures included on the construction plans to ensure compliance with the noise limit shall be prepared by the project applicant and submitted to the County for approval prior to the issuance of the construction permit. The following measures may be included to reduce construction noise:

- Construction equipment to be properly outfitted and maintained with manufacturer-recommended noise-reduction devices.
- Diesel equipment to be operated with closed engine doors and equipped with factory-recommended mufflers.
- Mobile or fixed “package” equipment (e.g., arc-welders and air compressors) to be equipped with shrouds and noise control features that are readily available for that type of equipment.
- Electrically powered equipment to be used instead of pneumatic or internal-combustion powered equipment, where feasible.
- Unnecessary idling of internal combustion engines (e.g., in excess of 5 minutes) to be prohibited.
- Material stockpiles and mobile equipment staging, parking, and maintenance areas to be located as far as practicable from noise-sensitive receptors.
- The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
- Temporary sound barriers or sound blankets may be installed between construction operations and adjacent noise-sensitive receptors. Due to equipment exhaust pipes being approximately 7 to 8 feet above ground, a sound wall at least 10 feet in height above grade, to block the line-of-sight between project construction activities and residences along the eastern property lines. These barriers would mitigate noise levels to acceptable levels. To effectively reduce noise levels, the sound barrier should be constructed of a material with a Sound Transmission Class (STC) rating of 22 or 23 with no gaps or perforations and remain in place until the conclusion of construction activities.
- The project applicant shall notify residences within 100 feet of the project’s property line in writing within one week of any construction activity. The notification shall describe the

activities anticipated, provide dates and hours, and provide contact information with a description of a complaint and response procedure.

- The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process for the affected resident shall be established prior to construction commencement to allow for the resolution of noise problems that cannot be immediately solved by the site supervisor.

DOCUMENTATION: The applicant shall provide a copy of the Construction Noise Management Plan to the [PDS] for approval prior to the issuance of the Construction Permit.

TIMING: Prior to approval of any grading and/or improvement plans and the issuance of any Grading or Construction Permits.

MONITORING: The on-site construction supervisor shall have the responsibility of overseeing the implementation of the Construction Noise Management Plan during project construction.

3. Critical Project Design Elements That Must Become Conditions of Approval:

The following project design elements were either proposed in the project application or the result of compliance with specific environmental laws and regulations and were essential in reaching the conclusions within the attached Environmental Initial Study. While the following are not technically mitigation measures, their implementation must be assured to avoid potentially significant environmental effects.

AIR-1 – FUGITIVE DUST

INTENT: In order to mitigate for fugitive dust during construction activities.

DESCRIPTION OF REQUIREMENT: The project applicant or designee shall implement the following measures to mitigate fugitive dust compliant with San Diego Air Pollution Control District (SDAPCD) Rule 55 and County Code Section 87.428 (Grading Ordinance):

- a. All haul/dump trucks entering or leaving the site with soil or fill material must maintain at least two (2) feet of freeboard or cover loads of all haul/dump trucks securely.
- b. Areas recently disturbed by dozer/scrapper passes and any unpaved roads within the project limits will be watered a minimum of three (3) times daily.
- c. Grading activities will be terminated in winds in excess of 25 miles per hour (mph).
- d. Dust and debris at public street access points shall be cleaned regularly using sweepers and water trucks.
- e. Dirt storage piles will be stabilized by chemical binders, tarps, fencing, or other suppression measures.
- f. Internal construction-roadways will be stabilized by paving, chip sealing, or applying stabilizing chemicals after rough grading.

- g. Apply non-toxic soil stabilizers to inactive, exposed surfaces when not in use for more than 3 days.
- h. A 15-mph speed limit on unpaved surfaces shall be enforced.

DOCUMENTATION: The applicant or designee shall comply with the Air Quality requirements of this condition.

TIMING: The following actions shall occur throughout the duration of construction and grading.

MONITORING: The [DPW, PDCI] shall make sure that the grading contractor complies with the Air Quality requirements of this condition. The [DPW, PDCI] shall contact the [PDS, PCC] if the applicant fails to comply with this condition.

DPW RECYCLING – GRADING MATERIAL DIVERSION

INTENT: In order to comply with the Grading Material Diversion Program, project recycling and diversion is designed to increase diversion of grading, land clearing, and brushing materials from landfills, extend the useful life of local landfills, and support construction and demolition project compliance with State waste diversion requirements.

DESCRIPTION OF REQUIREMENT: For all grading projects >5,000 cubic yards, a Daily Log of all grading, land clearing, and brushing material that is exported or reused/repurposed must be retained on-site. The Daily Log must include all export receipts or other vendor or disposal or transfer station facility information that accepted grading material from the approved grading project.

DOCUMENTATION: Daily Logs shall be prepared and kept on-site for inspection and include the following:

- a. Identify the project location.
- b. Log date that material was transported off the site.
- c. Log type of grading or clearing material.
- d. Weight of the material or its approximate tonnage or cubic yards.
- e. Name of the party transporting the materials.
- f. Name of the receiving facility or exporter, and whether the material was disposed of in a landfill, salvaged for future use off-site, or recycled.
- g. Each log entry shall correspond with a receipt issued by the party that transported the material off-site or by facility that accepted the materials. If the materials were hauled by the grading contractor, export receipts shall be compiled within 90 days of the date of the log entry.
- h. The Daily Log shall include separate entries for each occurrence of materials reused on-site.

- i. The Daily Log and all receipts shall be maintained at the project site and made available to any County inspector responsible to ensure compliance with this requirement.

TIMING: The following actions and logs shall occur throughout the duration of the earth-disturbing activities.

MONITORING: The [DPW, PDCI] shall ensure that the grading contractor is preparing and maintaining the daily logs on-site. The [DPW, PDCI] shall contact the [DPW, CO] if the grading contractor or applicant fails to comply with this condition.

DPW RECYCLING – GRADING MATERIAL DIVERSION

INTENT: In order to comply with the Grading Material Diversion Program, project recycling and diversion is designed to increase diversion of grading, land clearing, and brushing materials from landfills, extend the useful life of local landfills, and support construction and demolition project compliance with State waste diversion requirements.

DESCRIPTION OF REQUIREMENT: At the conclusion of the grading activities and prior to the release of Rough Grade Inspection, and prior to issuance of any building permit, the Final Debris Management Report (DMR) must be prepared and submitted for review and approval.

DOCUMENTATION: The DMR final report (see template) shall be prepared and submitted for review and approval by the [DPW, CO] and shall include:

- a. Project name.
- b. List of total weight, tonnage, or cubic yards of materials, by type, which was recycled, salvaged, or disposed of in a landfill.
- c. Provide copies of receipts for export facilities, haulers, or materials reused on site.
- d. Signed self-certification letter (see template).

TIMING: The final report shall be prepared and submitted at Rough Grade inspection.

MONITORING: The [DPW, PDCI] shall ensure that the grading contractor has prepared and submitted the final report to [DPW, CO]. The [DPW, PDCI] shall contact the [DPW, CO] if the grading contractor or applicant fails to comply with this condition.

FIRE-1 – FIRE DISTRICT REVIEW

INTENT: In order to comply with the approved project design indicated on the approved plot plan, the project shall be reviewed and approved by the Deer Springs Fire Protection District.

DESCRIPTION OF REQUIREMENT: The applicant will ensure that the Deer Springs Fire Protection District reviews the project prior to building permit to ensure that the 5-foot firefighter pathway, driveway surfacing, 100 feet of defensible space away from natural vegetation, proper signage, and other required design features have been incorporated into the final design

DOCUMENTATION: The [PDS, LDR] shall review the plans for consistency with the condition.

TIMING: Prior to building permit issuance, or use in the premises in reliance of this permit, the VCFPD must provide a review and approval.

MONITORING: The [PDS, LDR] and [DPR, TC] shall review the plans for consistency with the condition.

NOISE-1 – NOISE ATTENUATION BARRIER

INTENT: In order to minimize potential operational project noise at adjacent residences, a noise attenuation barrier shall be installed along the project's eastern boundary.

DESCRIPTION OF REQUIREMENT: As part of the project design, a 10-foot noise attenuation barrier shall be installed along the project's eastern boundary adjacent to the nearby residences, as shown on Figure 3, *Site Plan*, of the Initial Study. The acoustic barrier would be 855 feet long and constructed of masonry, wood, plastic, fiberglass, steel, or a combination of those materials.

DOCUMENTATION: The acoustic barrier shall be documented on the project's site plan and provided to the [PDS] for approval prior to issuance of the Construction Permit.

TIMING: Prior to approval of any grading and/or improvement plans and issuance of any Grading or Construction Permits.

MONITORING: The on-site construction supervisor shall have the responsibility of overseeing the implementation of the noise attenuation barrier during project construction.

ROADS-1 – DEBRIS MANAGEMENT PLAN (DMP)

INTENT: In order to comply with the Grading Material Diversion Program, project recycling and diversion is designed to increase diversion of grading, land clearing, and brushing materials from landfills, extend the useful life of local landfills, and support construction and demolition project compliance with State waste diversion requirements. This includes grading, clearing, and brushing material for grading projects over 5,000 cubic yards. For additional questions, please call (858) 694-2463 or email CDRecycling@sdcounty.ca.gov.

DESCRIPTION OF REQUIREMENT: To divert (recycle, reuse, repurpose) 100% of excavated soils, trees, stumps, rocks, and associated vegetation and soils from the following types of projects: (1) non-residential excavation and grading projects; (2) residential projects that require Major Grading permits. Grading projects greater than 5,000 cubic yards shall prepare DMP prior to plan approval. All documentation must be submitted and approved by a DPW Compliance Official. Specific requirements are as follows:

a. Prior to Grading plan approval, a DMP is required, consisting of:

- The type of project.
- The total cubic yardage for the project.
- The estimated weight of grading or land-clearing debris, by material type, that the project is expected to generate.

- The estimated maximum weight of grading or land-clearing debris that can feasibly be diverted via reuse, salvage, or recycling.
 - The estimated weight of grading or land-clearing debris that is planned to be disposed of in a landfill.
 - The name of the facility (or facilities) that debris will be exported to.
- b. During grading activities, a Daily Log of all grading, land clearing, and brushing material that is exported or reused/repurposed, must be prepared and retained on-site. The Daily Log must include all export receipts from an inert processing facility, green material processing operation, a Construction & Demolition processing facility, or other vendor or disposal or transfer station facility that accepted grading material from the approved grading project. If material was reused on-site, other forms of documentation (such as photos) will be accepted in lieu of receipts. Daily logs shall include:
- Identify the project location.
 - Log the date that material was transported off-site.
 - Log the type of graded or cleared material.
 - Estimated material weight, tonnage, or cubic yards.
 - Name of entity transporting the material.
 - Name of the receiving facility or exporter, and detailing whether the material was salvaged, recycled, or disposed of in a landfill.
 - Daily log entries shall correspond to receipts by materials transporter or receiving facility. If the grading contractor exported materials off-site, receipts shall be compiled within 90 days of the receipts.
 - Daily logs shall include separate entries for each occurrence of materials reused on site.
 - Daily logs and all receipts shall be maintained at the project site and made available to any County Inspector for compliance with this condition.
- c. Exemption: Excavated soil and land-clearing debris that is contaminated by disease or pests are not required to be reused on- or off-site, provided that: (i) the County Agricultural Commissioner has made a determination of disease or pest contamination and permittee follows commissioner's direction for recycling or disposal of the material, (ii) the materials are generated in a known pest and/or disease quarantine zone identified by the California Department of Food and Agriculture, or (iii) the materials are otherwise not required to be reused under the California Green Building Standards (CalGreen) Code.

DOCUMENTATION: The applicant shall prepare the DMP and submit the plan for review and approval by the DPW Recycling Compliance Official. During grading operations, a daily log shall be prepared and kept on-site. For additional questions, please call (858) 694-2463 or email CDRecycling@sdcounty.ca.gov. Templates for all forms required are available at: <https://www.sandiegocounty.gov/content/sdc/dpw/land/grading.html>.

TIMING: Prior to the issuance of any permit, the DMP shall be prepared and submitted to the DPW Recycling Official [DPW CO] for review and approval.

MONITORING: The [DPW, CO] shall review and approve the DMP documents for the project. The [DPW, CO], shall forward the approval of the DMP to [PDS, LDR] for compliance with this condition.

ROADS-2 – DEBRIS MANAGEMENT REPORT (DMR)

INTENT: In order to comply with the Grading Material Diversion Program, project recycling and diversion is designed to increase diversion of grading, land clearing, and brushing materials from landfills, extend the useful life of local landfills, and support construction and demolition project compliance with State waste diversion requirements. This includes grading, clearing and brushing material for grading projects over 5,000 cubic yards. For additional questions, please call (858) 694-2463 or email CDRecycling@sdcounty.ca.gov.

DESCRIPTION OF REQUIREMENT: Prior to Rough Grade Inspection and release, and prior to issuance of any building permit, a Final DMR must be submitted for review and approval by the DPW Recycling Compliance Official. The report shall include:

- a. Project name.
- b. List of total weight, tonnage, or cubic yards of materials, by type, which were recycled, salvaged, or disposed of in a landfill.
- c. Provide copies of receipts for export facilities, haulers, or materials reused on site.
- d. Signed self-certification letter (see template).

DOCUMENTATION: Prior to Rough Grade Release and prior to issuance of any building permit, a final report shall be prepared and submitted for review and approval to the DPW Recycling Compliance Official. For additional questions, please call (858) 694-2463 or email CDRecycling@sdcounty.ca.gov. Templates for all forms required are available at: <https://www.sandiegocounty.gov/content/sdc/dpw/land/grading.html>.

TIMING: Prior to building permit issuance, and Rough Grading release, the DMR shall be prepared and submitted to DPW Recycling Official [DPW CO] for review and approval.

MONITORING: The [DPW, CO] shall review and approve the DMR documents for the project. The [DPW, CO], shall forward the approval of the DMR to [DPW, PDCI] and [PDS, Building PCC] for compliance with this condition.

STRMWTR-1 – EROSION CONTROL

INTENT: In order to Comply with all applicable stormwater regulations, the activities proposed under this application are subject to enforcement under permits from the State Construction General Permit, Order No. 2009-00090-DWQ, or subsequent order and the County Watershed Protection Ordinance (WPO) No.10410, County Code Section 67.801 et. seq., and all other applicable ordinances and standards for this priority project.

DESCRIPTION OF REQUIREMENT: The applicant shall maintain the appropriate on-site and off-site Best Management Practices pursuant to the approved Stormwater Quality Management Plan (SWQMP) and Erosion Control Plan including, but not limited to the erosion control measures, irrigation systems, slope protection, drainage systems, desilting basins, energy dissipators, and silt control measure.

- a. An agreement and instrument of credit shall be provided for an amount equal to the cost of this work as determined or approved by the [PDS], in accordance with the County of San Diego Grading Ordinance Section 87.304. The cash deposit collected for grading, per the grading ordinance, will be used for emergency erosion measures. The developer shall submit a letter to [PDS, LDR] authorizing the use of this deposit for emergency measures.
- b. An agreement in a form satisfactory to County Counsel shall accompany the Instrument of Credit to authorize the County to unilaterally withdraw any part of or all the Instrument of Credit to accomplish any of the work agreed to if it is not accomplished to the satisfaction of the County PDS and/or DPW by the date agreed.

DOCUMENTATION: The applicant shall process an Erosion Control Plan and provide the letter of agreement and any additional security and/or cash deposit to the [PDS].

TIMING: Prior to the approval of any plan or any permit, and prior to use of the property in reliance of this permit, the agreement and securities shall be executed.

MONITORING: The [PDS, LDR] shall ensure that the Erosion Control Plan adequately satisfies the requirements of the conditions to potentially perform the required erosion control and stormwater control measures proposed on all construction and grading plans. [DPW, PDCI] shall use the securities pursuant to the agreement to implement and enforce the required stormwater and erosion control measures pursuant to this condition during all construction phases as long as there are open and valid permits for the site.

STRMWTR-2 – STORMWATER MAINTENANCE AGREEMENT

INTENT: In order to promote orderly development and to comply with the County WPO No.10410 (County Code Section 67.801 et. seq.), the maintenance agreements shall be completed.

DESCRIPTION OF REQUIREMENT: Process a Stormwater Maintenance Agreement to ensure the maintenance of the Category 2 Structural Best Management Practices (BMPs) to the satisfaction of the Director of DPW and/or PDS. The Maintenance Agreement shall be signed, notarized, and recorded by the applicant.

DOCUMENTATION: The applicant shall process the agreement forms with [PDS, LDR] and pay any deposit and applicable review fees.

TIMING: Prior to the approval of any plan or any permit, and prior to use of the property in reliance of this permit, the agreement and securities shall be executed.

MONITORING: The [PDS, LDR] shall review the agreements/mechanisms for consistency with the condition and County Standards.

STRMWTR-3 – PROVISION OF STORMWATER DOCUMENTATION TO PROPERTY OWNER

INTENT: In order to promote orderly development and to comply with the County WPO No.10410, County Code Section 67.801 et. seq., stormwater documentation shall be provided to the property owner.

DESCRIPTION OF REQUIREMENT: Demonstrate that copies of the following documents are provided to the property owner and initial occupants:

- a. A copy of the project's approved SWQMP (with attached Operation & Maintenance Plan).
- b. A copy of the project's recorded Maintenance Notification Agreement and/or Stormwater Facilities Maintenance Agreement and/or Private Road Maintenance Agreement showing the BMPs pertaining to the property.
- c. Sample copies of the following:
 - 1) A Letter for Privately Owned Stormwater Treatment Control Best Management Practices Operation and Maintenance Verification.
 - 2) One Operation and Maintenance Verification Form for each type of Private Treatment Control BMP.

DOCUMENTATION: The applicant shall submit a letter stating that the above documentation has been submitted to the property owner and initial occupants.

TIMING: Prior to any occupancy, final grading release, or use of the premises in reliance of this permit; provision of stormwater documents shall be completed.

MONITORING: The [PDS, LDR] and [DPW, WPP] shall review the letter provided by the applicant for consistency with the condition and County Standards.

STRMWTR-4 – VERIFICATION OF STRUCTURAL BMPs

INTENT: In order to promote orderly development and to comply with the County WPO No.10410 (County Code Section 67.801 et. seq.), verification of Structural BMPs shall be completed.

DESCRIPTION OF REQUIREMENT: Complete a Structural BMP Verification Form as shown in Attachment 10 of the PDP SWQMP.

DOCUMENTATION: The applicant shall process the Structural BMP Verification Forms with [DPW, PDCI] or [PDS, BLDG].

TIMING: Prior to any occupancy, final grading release, or use of the premises in reliance of this permit; execution of the Structural BMP Verification Form shall be completed.

MONITORING: The [PDS, LDR] and [DPW, WPP] shall review the Structural BMP Verification Forms for consistency with the condition and County Standards.

STRMWTR-5 – SELF-VERIFICATION OF OPERATION AND MAINTENANCE LETTER

INTENT: In order to promote orderly development and to comply with the County WPO No.10410, County Code Section 67.801 et. seq., an operation and maintenance verification form for each Structural BMP shall be completed.

DESCRIPTION OF REQUIREMENT: Every year the property owner shall receive from the County a BMP Verification Form to be completed for each privately owned Structural BMP.

DOCUMENTATION: Every year, the property owner shall file with the County the completed Structural BMP Verification Form stating the maintenance performed during the reporting period for each privately owned Structural BMP with [DPW, WPP].

TIMING: Upon establishment of the use, this condition shall apply for the duration of the term of this permit.

MONITORING: The [DPW, WPP] is responsible for compliance of this permit.

EXPLANATION OF COUNTY DEPARTMENT AND DIVISION ACRONYMS			
Planning & Development Services (PDS)			
Project Planning Division	PPD	Land Development Project Review Teams	LDR
Permit Compliance Coordinator	PCC	Project Manager	PM
Building Plan Process Review	BPPR	Plan Checker	PC
Building Division	BD	Map Checker	MC
Building Inspector	BI	Landscape Architect	LA
Zoning Counter	ZO		
Department of Public Works (DPW)			
Private Development Construction Inspection	PDCI	Environmental Services Unit Division	ESU
Department of Environmental Health (DEH)			
Land and Water Quality Division	LWQ	Local Enforcement Agency	LEA
Vector Control	VCT	Hazmat Division	HMD
Department of Parks and Recreation (DPR)			
Trails Coordinator	TC	Group Program Manager	GPM
Parks Planner	PP		
Department of General Services (DGS)			
Real Property Division	RP		

August 25, 2025

ADOPTION STATEMENT: This Mitigated Negative Declaration was adopted and above California Environmental Quality Act findings made by the:

on

Daniella Hofreiter, Planning Manager
Project Planning Division

: :



TYLER FARMER
ASSISTANT DIRECTOR

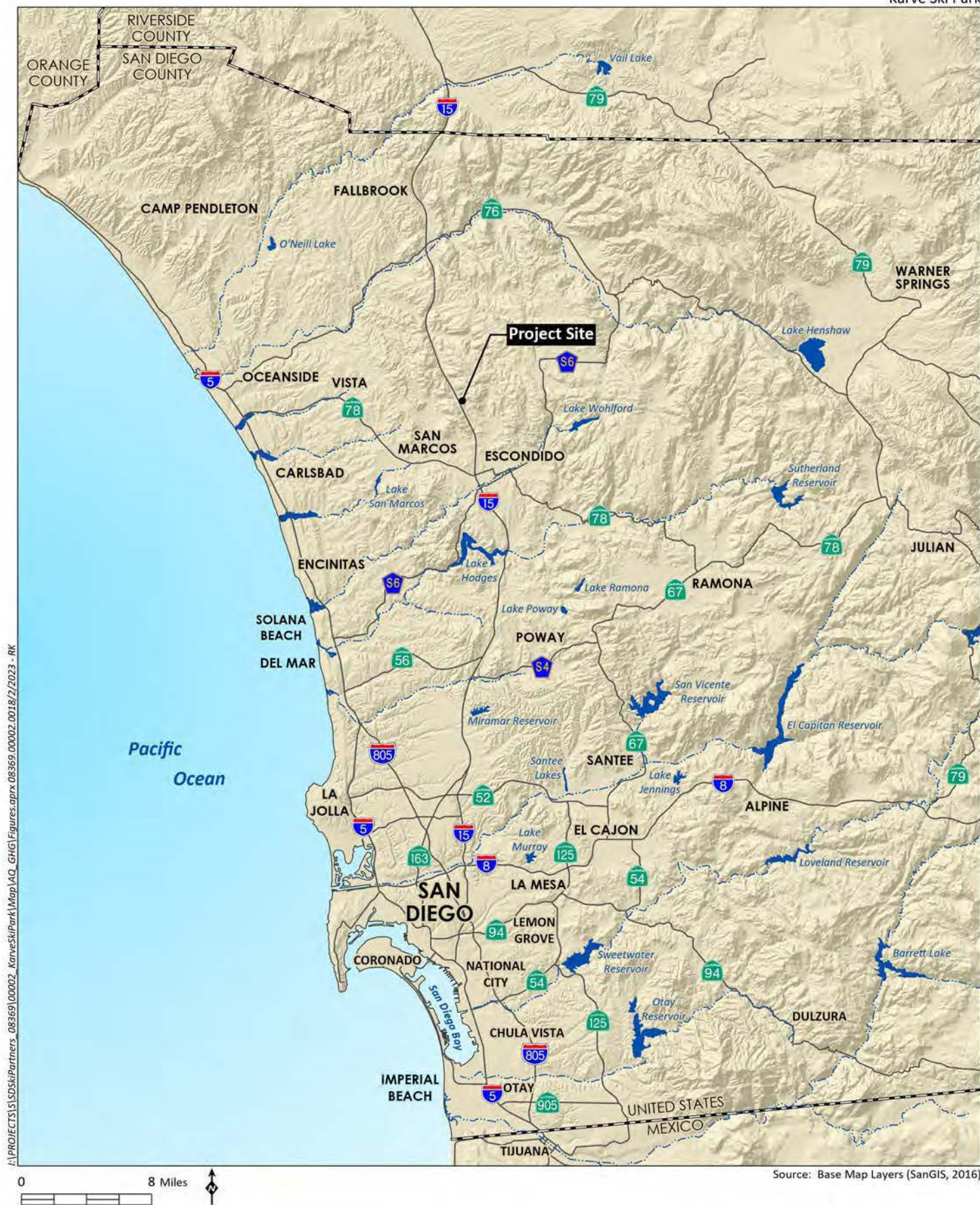
VINCE NICOLETTI
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 210, SAN DIEGO, CALIFORNIA 92123
(858) 505-6445 General • (858) 694-2705 Codes Compliance
(858) 565-5920 Building Services

August 25, 2025

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

1. Title; Project Number(s); Environmental Log Number:
Karve Ski Park Major Use Permit;
PDS2023-MUP-23-009; PDS2023-ER-23-08-008
2. Lead agency name and address:
County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239
3.
 - a. Contact David Mack, Senior Project Manager
 - b. Phone number: (831) 320-0413
 - c. E-mail: David.Mack@sdcounty.ca.gov
4. Project location:
The 10.45-acre project site is located at 26351 North Centre City Parkway in the North County Subregional Plan area within unincorporated San Diego County (Assessor's Parcel Numbers [APN] 187-630-12-00 and 187-322-29-00). The project site is located east of North Centre City Parkway, between Tierra Libertia Road (to the north) and Jesmond Dene Road (to the south), as shown in Figure 1, *Regional Location* and Figure 2, *Aerial Photograph*.





5. Project Applicant name and address:

SD Ski Partners Company LLC
9520 Pathway Street
Santee, CA 92071

6. General Plan

Community Plan:	North County Metro Subregional Plan
Land Use Designation:	Semi-Rural 1 (SR-1)
Density:	1 dwelling unit/1, 2, 4 acre(s)
Floor Area Ratio (FAR)	N/A

7. Zoning

Use Regulation:	Limited Agriculture (A70)
Minimum Lot Size:	N/A
Special Area Regulation:	N/A

8. Description of project:

The project is an outdoor, year-round synthetic snow sports complex and recreational park requiring a Major Use Permit (MUP; project). The project site is located at 26351 North Centre City Parkway in the North County Metro Subregional Plan area within unincorporated San Diego County (County). The site is subject to the General Plan Semi-Rural Regional Category, Semi-Rural 1 (SR-1) Land Use Designation. Zoning for the site is Limited Agriculture (A70). According to the County of San Diego's Zoning Ordinance Section, the use is defined as Participant Sports and Recreation: Outdoor, which requires a MUP in the A70 zone.

As shown in Figure 2, the project site is currently used for a golf driving range. The primary activity would include three designed artificial ski slopes which mimic the attributes of snow. Additional facilities would include a magic carpet (standing ski lift), zip line, jump tower, village area amenities/services, an outdoor patio/pavilion, and restrooms (Figure 3, *Site Plan*). The village area amenities/services would include four buildings totaling 9,525 square feet (sf): a 2,000-sf box office and guest services, first aid, and management office (Building A); a 4,125-sf pavilion to include food and bar with seating indoor and outdoor with restrooms (Building B); 2,400 sf with equipment rental and event rooms (Building C); and 1,000 sf of maintenance and storage (Building D). The existing golf driving range use would be retained and operations would be limited to early morning hours when the ski park is not being operated. The project would include the installation of rooftop solar in accordance with California Title 24 Building Energy Efficiency Standards.

In addition, the project would include a lined biofiltration basin on the northwestern side of the project site to collect stormwater runoff from the project site that would outlet onto North Centre City Parkway. The project would be served by an on-site wastewater treatment system and water service would be provided by the Valley Center Municipal Water District. Sewage would be pumped to a leach field along the northeastern boundary of the property with a reserve area along the southern boundary. No extension of sewer

or water utilities would be required by the project. Earthwork would consist of a balanced cut and fill of approximately 17,700 cubic yards of material.

Access would be provided by one full-access driveway on Tierra Libertia Road and one exit-only driveway on Jesmond Dene Road. The project would provide 146 parking spaces including 19 electric vehicle charging station (EVCS) spaces and 26 electric vehicle supply equipment (EVSE) spaces. As part of project design, a 10 feet noise attenuation barrier would be installed along the project's eastern boundary adjacent to the nearby residences, as shown on Figure 3. The acoustic barrier would be 855 feet long and constructed of masonry, wood, plastic, fiberglass, steel, or a combination of those materials. The project would not require off-site improvements. The project is assumed to be implemented in one phase lasting approximately 19 months.

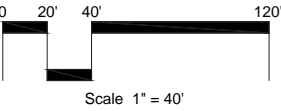
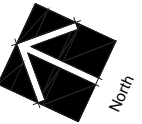
9. Surrounding land uses and setting:

Land uses surrounding the project site include a plant nursery to the north and single-family residential uses to the northeast, east, and southeast. There is open space to the south. Interstate (I-) 15 is across North Centre City Parkway from the project site, approximately 150 feet away. The site is relatively flat in the northern portion (1,025 feet above mean sea level [amsl]) and contains a gradual slope in the southern portion, where the elevation rises to approximately 1,075 feet amsl. The topography of adjacent land is hilly.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

<u>Permit Type/Action</u>	<u>Agency</u>
Landscape Plans	County of San Diego
Major Use Permit	County of San Diego
Site Plan	County of San Diego
County Right-of-Way Permits Construction Permit Excavation Permit Encroachment Permit	County of San Diego
Grading Permit	County of San Diego
Improvement Plans	County of San Diego
Lighting Plan	County of San Diego
Wastewater Treatment Permit	County of San Diego
National Pollutant Discharge Elimination System (NPDES) Permit	RWQCB
General Construction Storm water Permit	RWQCB
Waste Discharge Requirements Permit	RWQCB
Water District Approval	Valley Center Municipal Water District
Fire District Approval	Deer Springs Fire Protection District

I:\PROJECTS\SDS\Partners_08369\0002_KarveSkiPark\Map\AQ_GHG\Fig3_SitePlan.indd 08369.00002.001 7/1/2024 -RK



11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, has consultation begun?

YES

☒

NO

☐

Note: Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21083.3.2). Information is also available from the Native American Heritage Commission's Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a "Potentially Significant Impact" or a "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

☐ Aesthetics

☐ Agriculture & 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 evaluation:

- ☐ On the basis of this Initial Study, Planning & Development Services finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ On the basis of this Initial Study, Planning & Development Services finds 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.
- ☐ On the basis of this Initial Study, Planning & Development Services finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Signature

Date

Printed Name

Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS. Except as provided in Public Resources Code Section 21099, Would the project:

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

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

Discussion/Explanation: The County's Guidelines for Determining Significance, Report Format and Content Requirements – Visual Resources establish significance thresholds for effects on a scenic vista. As stated in the County guidelines, a significant scenic vista impact would occur if the project would substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista from a public road, a trail within an adopted County or State trail system, a scenic vista or highway, or a recreational area. Scenic vistas from public roads include views from roads with scenic vistas, and roads within the County Scenic Highway and State Scenic Highway systems. Recreational areas may include local, regional, state, and federal lands.

Less Than Significant Impact: As described in the General Plan Update (GPU) Environmental Impact Report (EIR; County of San Diego 2011), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified within the GPU EIR and are the closest that the County comes to specifically designating scenic vistas. Many public roads in the County currently have views of RCAs or expanses of natural resources that would have the potential to be considered scenic vistas. Numerous public trails are also available throughout the County. New development can often have the potential to obstruct, interrupt, or detract from a scenic vista.

The project site is located in the North County Metro Subregional Plan Area. According to the North County Metro Subregional Plan, the nearest RCA to the project site is the Merriam Mountains RCA, which is located approximately 0.4 mile north of the project site at its nearest point, around the I-15 offramp onto Deer Springs Road. A small portion of the Merriam Mountains west of I-15 is visible from the project site, and the existing views would be retained by the proposed project, as the project does not propose any structures that would block existing views. Due to intervening structures, vegetation, and topography, no impacts would occur to the Merriam Mountains RCA.

The project site is an existing golf driving range located east of North Centre City Parkway, between Tierra Libertia Road and Jesmond Dene Road. Land uses surrounding the project site include a plant nursery to the north and single-family residential uses to the northeast, east, and southeast. There is open space to the south. I-15 is across North Centre City Parkway from the project site, approximately 150 feet west. The project is not located near or within, or visible from, a scenic vista and would not substantially change the composition of an existing scenic vista in a way that would adversely alter the visual quality or character of the view. Given the developed environment surrounding the project site, the proposed project would not substantially degrade a scenic vista. Therefore, the proposed project would not have an adverse effect on a scenic vista. **Impacts would be less than significant.**

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

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

Discussion/Explanation: The State Scenic Highway System includes a list of highways that are either eligible for designation as State scenic highways or have been officially designated. These highways are identified in Section 263 of the Streets and Highways Code and can be found under the Scenic Highway System List. The California Scenic Highways Program is under the stewardship of the California Department of Transportation (California Department of Transportation [Caltrans] 2020). Scenic corridors along these highways consist of land that is visible from, adjacent to, and outside the highway right-of-way, and is comprised primarily of scenic and natural features. Topography, vegetation, and viewing distance may determine the corridor boundaries.

Less Than Significant Impact: The nearest eligible State Scenic Highway to the project site is State Route (SR) 76, which is eligible as scenic from I-5 to SR 79, near Lake Henshaw. The closest eligible portion of SR 76 is approximately 9 miles northwest of the project site. The nearest designated State Scenic Highway to the project site is a 3-mile stretch of SR 52 adjacent to Mission Trails Open Space, approximately 23 miles south of the project site. Due to the distance and intervening topography, the project site would not be visible from either of these portions of eligible or designated scenic highways. As such, the project would not damage or remove visual resources within a designated or eligible State scenic highway. The Conservation Element of the County's General Plan identifies I-15, which is immediately west of the project site, as a County Scenic Corridor. The project would be visible from I-15. However, the zip line tower and overhead cables would sit only 15 feet above the natural slope of the land and would be masked by the vegetated mountains behind the project site in the background. Additionally, trees and vegetation proposed on the project's landscape plan would obscure the top 15 feet of the tower from I-15 at maturity. No scenic resources are present on the site, and the project would not damage scenic resources within a State Scenic Highway. **Impacts would be less than significant.**

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

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

Discussion/Explanation: Visual resources analysis generally involves the identification of visual resources (natural and built) within the visual landscape and the overall evaluation of the quality and character of that landscape. Analysis of a project's impacts to visual resources is based on the identification of the change that would occur when a project proposes to alter the existing visual character and/or visual quality of the environment.

Less Than Significant Impact: The project site is a driving range proximate to I-15, located east of North Centre City Parkway and between Tierra Libertia Road and Jesmond Dene Road. The existing visual character and quality surrounding the project site can be characterized by varying degrees of development, including single-family residences, agricultural uses, and open space.

The proposed project is a synthetic ski park. While the project is distinct from other development in the surrounding area, it has been designed in conformance with the North County Metro Subregional Plan and Design Guidelines. The project would preserve the existing slope on the property and would construct low-lying buildings in shades of brown and tan to blend in with the surrounding area. Additionally, trees and vegetation proposed in the landscape plan would obscure the zip line tower, which is the only structure proposed at the top of the property's slope. The remaining structures would be developed at the lowest point of the property, adjacent to Tierra Libertia Road, and would similarly be shrouded by trees proposed in the project's surface parking lot. Therefore, project development would not substantially alter or degrade the existing visual character or quality of the project site or surroundings. Impacts would be less than significant.

The project would not result in cumulatively considerable impacts on visual character or quality. No past, present, or future projects that could contribute to a cumulative impact with the project were identified. Future projects located within the viewshed surrounding the project would not contribute to a cumulative impact because the project would be visually integrated into the surroundings in an unobtrusive manner, as discussed above. Therefore, the project would not result in any adverse project or cumulative level effect on visual character or quality on-site in the surrounding area. **Impacts would be less than significant.**

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

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

Discussion/Explanation: The San Diego County Light Pollution Code includes requirements for outdoor lighting to minimize light pollution to allow citizens of the County to view and enjoy the night environment and to protect the Palomar and Mount Laguna observatories from the detrimental effect that light pollution has on astronomical research. Lighting impacts may also occur due to light trespass onto adjacent properties. Potential glare impacts may result from highly reflective building materials, including but not limited to reflective glass and high-gloss surface color that would create daytime glare.

Less Than Significant Impact: The project site is located within Zone B (more than 15 miles away) from the Palomar Observatory and Zone B from the Mount Laguna Observatory, as identified by the County Light Pollution Code. Specifically, the project site is located approximately 18 miles from the Palomar Observatory and 47 miles from the Mount Laguna Observatory and would therefore not create a source of light that could impact either observatory.

The project would use outdoor lighting; however, it would not adversely affect nighttime views or astronomical observations because the project would conform to the Light Pollution Code (Section 51.201-51.209), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights.

In addition, the proposed project would control outdoor lighting and sources of glare in the following ways:

1. The project would not install outdoor lighting that directly illuminates neighboring properties.
2. The project would not install outdoor lighting that would cast a direct beam angle towards a potential observer, such as a motorists, cyclist or pedestrian.
3. The project would not install outdoor lighting for vertical surfaces such as buildings, landscaping, or signs in a manner that would result in useful light or spill light being cast beyond the boundaries of intended area to be lit.
4. The project would not install any highly reflective surfaces such as glare-producing glass or high-gloss surface color that would be visible along roadways, pedestrian walkways, or in the line of sight of adjacent properties.

While the project would involve synthetic snow, which would be white mats and sprayed periodically with water, the surface materials and texture of the mats are not glossy or reflective in nature. Furthermore, the material would be on a slope which would not lend to direct reflective glare effects to motorists on nearby roadways (compared to a building or other structure with a vertical surface component that would create the appropriate geometrical angle for reflection). The project buildings and magic carpet would not include highly reflective surfaces or large elevated windows that could create glare to surrounding areas.

The project would not contribute to significant cumulative impacts on day or nighttime views because the project would conform to the Light Pollution Code (LPC). The Code was developed by the San Diego County Planning & Development Services and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources light pollution on nighttime views. The standards in the LPC are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the LPC is required prior to issuance of any building permit for any project. Mandatory compliance for all new building permits ensures that this project in combination with all past, present and future projects would not contribute to a cumulatively considerable impact. Therefore, compliance with the LPC ensures that the project would not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level.

In addition, the project's outdoor lighting is controlled through the MUP, which further limits outdoor lighting through strict controls. Therefore, compliance with the LPC, in combination with the outdoor lighting and glare controls listed above ensures that the project would not create a significant new source of substantial light or glare. **Impacts would be less than significant.**

II. AGRICULTURE AND FORESTRY RESOURCES

- 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, or other agricultural resources, to non-agricultural use? Convert Farmland of local importance (County of San Diego LARA Model)?

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

Discussion/Explanation:

No Impact: The project site is not designated by the Farmland Mapping and Monitoring Program (FMMP) as Prime Farmland, Unique Farmland, or Farmland of Statewide or local Importance. Therefore, the project would not convert an important farmland category designated by the FMMP to a non-agricultural use. Pursuant to the County's Guidelines for Determining Significance for Agricultural Resources (Agricultural Guidelines), if a site is not an active agricultural operation, has not historically been used for agriculture, and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or local Importance, these lands should not be considered agricultural resources. Therefore, according to the Agricultural Guidelines, the project site is not considered an agricultural resource and there would be no impact. **No impact would occur.**

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

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

Discussion/Explanation:

Less Than Significant Impact: The project site is zoned A70, which is considered to be an agricultural zone. However, the project would not result in a conflict in zoning for agricultural use because the proposed use is recreation, which is a permitted use in the A70 zone with an MUP, and the project site is not currently being used for agriculture. The project would not create a conflict with existing zoning for agricultural use. Additionally, the project site is not under a Williamson Act Contract. Therefore, the project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. **Impacts would be less than significant.**

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

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

Discussion/Explanation:

No Impact: The project site does not contain forest land or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project is consistent with existing zoning and a rezone of the property is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland production zones. **No impact would occur.**

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

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

Discussion/Explanation:

No Impact: The project site and adjacent area do not contain any forest lands as defined in Public Resources Code section 12220(g). Therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of off-site forest land. **No impact would occur.**

- 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?

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

Discussion/Explanation:

No Impact: A plant nursery and growing site sits approximately 50 feet north of the project site, across Tierra Libertia Road. Other agricultural sites exist within one mile of the project site, including a plant nursery across I-15 and a farm northeast of the project site. The project would implement construction best management practices (BMPs) to ensure neighboring properties would not be impacted by construction. Additionally, the project proposes to replace an existing recreational use (driving range) with a new recreational use on a developed site; no impacts to existing agricultural uses would occur.

As described above in Section II(a), the project has been determined to not meet the definition of an agricultural resource pursuant to the Agricultural Guidelines. In addition, the project is not under a Williamson Act Contract or agricultural preserve, nor is the project site located within the vicinity of a Williamson Act Contract or an agricultural preserve. Therefore, the project would not have significant adverse impacts related to the conversion of Important Farmland or other agricultural resource to a non-agricultural use. In addition, as described above in Section II(c) and (d), the project would not result in the loss of forest land or conversion of forest land to non-forest use. **No impact would occur.**

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?

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

Discussion/Explanation: The project site is located within the San Diego Air Basin (SDAB). The applicable air quality plans include the Regional Air Quality Strategy (RAQS) for the SDAB, the 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (Attainment Plan), and applicable portions of the State Improvement Plan (SIP). The San Diego Air Pollution Control District (SDAPCD) and the San Diego Association of Governments (SANDAG) are responsible for implementing the RAQS and applicable portions of the SIP.

An Air Quality Technical Report was prepared for the project by HELIX Environmental Planning, Inc. (HELIX) dated July 2024 (HELIX 2024a; Appendix A).

Less Than Significant Impact: There are currently no structures requiring demolition prior to construction of the project. Therefore, no demolition would occur as part of the project. The project would produce emissions during construction and operation of the proposed project, as described further in Section III(b). The project proposes a synthetic ski park on an existing recreational site. The project site has a General Plan Land Use Designation of SR-1 and is currently zoned A70. With the proposed MUP, the project would be consistent with the zoning and Land Use Designation. No amendments to the County's General Plan, the North County Metro Subregional Plan, or County zoning would be required to accommodate the project. Therefore, the project would be consistent with the regional growth assumed in the RAQS and Attainment Plan, and the project would not conflict with or obstruct the implementation of those plans.

Furthermore, as part of its attainment planning process, the SDAPCD proposes and adopts Rules and Regulations to control air pollutants to demonstrate further progress toward attainment as part of the RAQS, Attainment Plan, and SIP. The project would also comply with applicable rules and regulations that have been adopted as part of the RAQS and SIP by the SDAPCD. Therefore, the project would not conflict with or obstruct the implementation of the RAQS, Attainment Plan, or the SIP. **Impacts would be less than significant.**

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?

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

Discussion/Explanation: The Environmental Protection Agency (EPA) classifies air basins (or portions of air basins) as in attainment or non-attainment for criteria air pollutants, which include the following: ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter, lead, and volatile organic compounds (VOC). O₃ is formed when VOCs and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Particulate matter pollution consists of very small liquid and solid particles in the air. Coarse particulate matter (PM₁₀) sources include motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources. Fine particulate matter (PM_{2.5}) sources include motor vehicles, industrial uses, residential fireplaces, and woodstoves.

The SDAB is presently in non-attainment for the National Ambient Air Quality Standards (NAAQS) 2008 8-hour O₃. The SDAB is also presently in non-attainment for O₃, PM₁₀, and PM_{2.5} for California Ambient Air Quality Standards (CAAQS). The SDAB is designated as either in attainment or unclassifiable/unclassified for all other criteria pollutants under the NAAQS and CAAQS.

Less Than Significant Impact: Air quality emissions associated with the project include emissions of PM₁₀, NO_x and VOCs from construction/grading activities, as well as VOCs from vehicle traffic to the project during operation. However, grading operations associated with the

construction of the project would be subject to County of San Diego Grading Ordinance, which requires the implementation of dust control measures. Emissions from the construction phase would be minimal and localized, resulting in PM₁₀ and VOC emissions below the screening-level criteria established by the Land Use and Environment Group (LUEG) guidelines for determining significance, as shown in Table 1, *Estimated Daily Construction Related Air Emissions*, below.

Table 1. Estimated Daily Construction-Related Air Emissions

Activity	Season / Year	Pollutant Emissions (pounds per day)					
		VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site Preparation	Winter / 2026	3.2	29.2	29.5	<0.1	9.1	5.1
Grading	Winter / 2026	3.1	27.4	28.4	<0.1	4.9	2.5
Grading	Summer/2026	3.1	27.4	28.5	<0.1	4.9	2.5
Building Construction	Summer/2026	1.1	9.9	13.1	<0.1	0.4	0.4
Building Construction	Winter/2027	1.1	9.9	13.0	<0.1	0.4	0.4
Paving	Summer/2027	1.0	7.0	10.6	<0.1	0.4	0.3
Architectural Coating	Summer/2027	3.1	0.8	1.1	<0.1	<0.1	<0.1
Maximum Daily Emissions		47.6	5.4	6.7	<0.1	0.6	0.4
<i>Screening Thresholds</i>		<i>75</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>55</i>
Exceed Thresholds?		No	No	No	No	No	No

Source: HELIX 2024a

lbs./day = pounds per day; VOC = volatile organic compound; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter 10 microns or less in diameter; PM_{2.5} = particulate matter 2.5 microns or less in diameter.

The project would involve the construction of a synthetic ski park. Area sources include emissions from landscaping equipment, the use of consumer products, and the reapplication of architectural coatings for maintenance. Energy sources would include electricity for lighting, heating, and cooling. The project would be all-electric and would not consume natural gas during operations. A portion of the electricity generation typically entails the combustion of fossil fuels, including natural gas and coal, which occurs at the power plant(s). A building's electricity use is thus associated with off-site or indirect emissions at the source of electricity generation, and these emissions are not included in the analysis of a land use development project's local or regional air quality impacts. In addition, operational emissions from mobile sources are associated with project-related vehicle trip generation and trip length. However, as shown in Table 2, *Estimated Daily Operational Air Emissions*, project operational emissions would be below the screening-level criteria established by the LUEG guidelines for determining significance.

Table 2. Estimated Daily Operational Air Emissions

Source	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile	2.0	1.6	16.5	<0.1	3.9	1.0
Area	0.3	<0.1	0.2	<0.1	<0.1	<0.1
Energy	0	0	0	0	0	0
Total Maximum Daily Emissions	2.3	1.6	16.7	<0.1	3.9	1.0
<i>Screening Thresholds</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
Exceed Thresholds?	No	No	No	No	No	No

Source: HELIX 2024a

Note: Totals may not sum due to rounding.

VOC = volatile organic compounds; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter 10 microns or less in diameter; PM_{2.5} = particulate matter 2.5 microns or less in diameter

There are no known current or future projects in the vicinity of the project where major construction involving demolition activities, cut-and-fill operations, or soil import/export, would occur concurrently with the project construction activities. The proposed project would have emissions below the screening-level criteria established by the LUEG guidelines for determining significance for VOCs and PM₁₀, therefore, the construction and operational emissions associated with the proposed project are not expected to create a cumulatively considerable impact nor a considerable net increase of PM₁₀, or any O₃ precursors. **Impacts would be less than significant.**

c) Expose sensitive receptors to substantial pollutant concentrations?

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

Discussion/Explanation: Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

Less Than Significant Impact: Sensitive receptors within a quarter mile of the project site include single-family residences adjacent to the eastern boundary, with the closest habitable structures being approximately 120 feet from the property line. There are no daycare centers, schools, hospitals, or senior care facilities within one mile of the project site. As discussed in the Air Quality Technical Report prepared for the project, this project does not propose uses or activities that would result in exposure of these identified sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near carbon monoxide hotspots. In addition, the project would not contribute to a cumulatively considerable exposure of sensitive receptors to substantial pollutant concentrations because the proposed project has emissions below the screening-level criteria established by the LUEG guidelines for determining significance. **Impacts would be less than significant.**

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

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

Discussion/Explanation:

Less Than Significant Impact: According to the South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations (SCAQMD 1993). The project, involving outdoor recreational development, would not include any of these uses. Project construction could result in minor amounts of odors associated with unburned

hydrocarbons in diesel heavy equipment exhaust. The odor of these diesel exhausts is objectionable to some; however, emissions would be intermittent and would disperse rapidly, and, therefore, would not affect a substantial number of people. Therefore, impacts associated with odors during the construction and operation of the project would be less than significant.

Impacts would be less than significant.

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 Wildlife, or CDFW, or U.S. Fish and Wildlife Service?

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

Discussion/Explanation:

No Impact: Based on satellite imagery and site photos, it has been determined that no native vegetation communities or habitats exist on or adjacent to the site because it has been completely disturbed. Therefore, the project would not have a substantial adverse effect on a candidate, sensitive, or special status species because there is not suitable habitat to support such species. The project also would not contribute to cumulative impacts to special status species. **No impact would occur.**

- 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 Wildlife or US Fish and Wildlife Service?

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

Discussion/Explanation:

No Impact: The proposed project site has been completely disturbed and does not contain riparian habitat or other sensitive natural communities as defined by the County of San Diego Multiple Species Conservation Program (MSCP), County of San Diego Resource Protection Ordinance (RPO), Natural Community Conservation Plan (NCCP) Fish and Wildlife Code, Endangered Species Act, Clean Water Act, or any other local or regional plans, policies or regulations. In addition, no riparian habitat or other sensitive natural community has been identified adjacent to the project site. Therefore, the project would not have an impact on riparian habitat or other sensitive natural community. **No impact would occur.**

- 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?

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

Discussion/Explanation:

No Impact: The proposed project site has been completely disturbed and does not contain wetlands as defined by Section 404 of the Clean Water Act, including, but not limited to, marsh, vernal pool, stream, lake, river or water of the U.S., which could potentially be impacted through direct removal, filling, hydrological interruption, diversion, or obstruction by the proposed development. Therefore, no impacts would occur to wetlands defined by Section 404 of the Clean Water Act and under the jurisdiction of the Army Corps of Engineers. **No impact would occur.**

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

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

Discussion/Explanation:

No Impact: The project site has been completely disturbed and contains no native vegetation or habitats. No impacts to wildlife corridors or linkages would occur as the project site does not support geological, topographic, or habitat features that would function in a corridor capacity. The project site is not part of a regional linkage/corridor as identified on MSCP maps, nor is it in an area considered regionally important for wildlife dispersal. Therefore, the project would not interfere with the movement of native resident or migratory fish or wildlife species, or established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. **No impact would occur.**

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

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

Discussion/Explanation:

No Impact: The project site is identified in the Draft North County segment of the County's MSCP plan, but the project site is not currently in the MSCP and is not subject to the Biological

Mitigation Ordinance (BMO). The project site has been completely disturbed and contains no native vegetation or habitats. Additionally, the project site is surrounded by development including single-family residences, a plant nursery, and the I-15 freeway. Therefore, the project would not conflict with other local policies or ordinances protecting biological resources. **No impact would occur.**

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

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

Discussion/Explanation:

Less Than Significant Impact: The project site is identified in the Draft North County segment of the County's MSCP Subarea Plan, but the project site is not currently in the MSCP and is not subject to the BMO. There are no sensitive habitats or species within the proposed project area. The site is entirely urban/developed and does not support native vegetation. As a Tier IV habitat, no on-site preservation is required and impacts to urban/developed do not require mitigation under the BMO. Furthermore, the site is not classified as a Biological Resource Core Area as it is not within the Pre-Approved Mitigation Area, is not within or adjacent to a large block of undisturbed habitat, is not mapped as having high habitat value, and does not support sensitive species. Given the current site conditions and the surrounding land uses, development of the proposed project would not hinder the formation of a future preserve system. The proposed project would not conflict with the MSCP or any other habitat conservation plan. **Impacts would be less than significant.**

V. CULTURAL RESOURCES -- Would the project:

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

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

Discussion/Explanation: The discussion below is based on the Cultural Resources Survey Report prepared for the project (HELIX 2025; Appendix B).

No Impact. Based on an analysis of records and a survey of the property overseen by County of San Diego approved archaeologists, Mary Robbins-Wade and Theodore G. Cooley, it has been determined that there are no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in an historical resources report titled, Karve Ski Park Project – Cultural Resources Survey Report (June 2024), prepared by Mary Robbins-Wade, Nicole Falvey, and Theodore G. Cooley. **No impact would occur.**

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

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

Discussion/Explanation: The discussion below is based on the Cultural Resources Survey Report prepared for the project (HELIX 2025; Appendix B).

Less Than Significant With Mitigation Incorporated. Based on an analysis of records and a survey of the property overseen by County of San Diego approved archaeologists, Mary Robbins-Wade and Theodore G. Cooley, it has been determined that the project site does not contain any archaeological resources. The results of the survey are provided in an archaeological survey report entitled, Karve Ski Park Project – Cultural Resources Survey Report (June 2024), prepared by Mary Robbins-Wade, Nicole Falvey, and Theodore G. Cooley. Visibility during the survey was extremely limited (0 to 5 percent). As such, there is the potential for the presence of previously unrecorded resources. Therefore, an Archaeological and Tribal Monitoring Program would be required as outlined in Mitigation Measure CUL-1 below:

MM-CUL-1 – Archaeological and Tribal Monitoring Program

A. Pre-Construction

1. Contract with a County-approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist and Native American monitor from an affiliated tribe shall perform the archaeological and tribal monitoring duties before, during and after construction.
2. Pre-construction meeting to be attended by the Project Archaeologist and Luiseño Native American monitor to explain the monitoring requirements.

B. Construction

1. Monitoring. The Project Archaeologist and Luiseño Native American monitor are to be on-site during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Luiseño Native American monitor. Both the Project Archaeologist and Luiseño Native American monitor will evaluate fill soils to ensure that they are negative for cultural resources.
2. If cultural resources are identified:
 - a. The Project Archaeologist and Luiseño Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.

- b. The Project Archaeologist shall contact the County Archaeologist, and culturally-affiliated tribes as identified in the Treatment Agreement and Preservation Plan at the time of discovery.
- c. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the project archaeologist, tribal monitor(s), and the tribal representative(s) to discuss the significance of the find. Optionally, the County Archaeologist may attend the meeting to discuss the significance of the find.
- d. Construction activities shall not resume in the area of discovery until an agreement has been reached by all parties as to appropriate mitigation. Work shall be allowed to continue outside of the buffer area and shall be monitored.
- e. Isolates and non-significant deposits shall be minimally documented in the field. The isolates and/or non-significant deposits shall be reburied on-site as identified in the Treatment Agreement and Preservation Plan.
- f. Treatment and avoidance of the newly discovered resources shall be consistent with the Treatment Agreement and Preservation Plan entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils, and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity.
- g. If cultural resources are identified, one or more of the following treatments, in order of preference, shall be employed:
 - i. Preservation in place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in place where they were found with no development affecting the integrity of the resources.
 - ii. Reburial of the resources on the project property. The measures for reburial shall include, at least, the following:
 - I. Measures and provisions to protect the future reburial area from any impacts in perpetuity.
 - II. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with the exception that sacred items, burial goods, and Native American human remains are excluded.
 - III. Any reburial process shall be culturally appropriate.

- IV. Listing of contents and location of the reburial shall be included in the confidential appendix of the Monitoring Report.
 - V. The Monitoring Report shall be filed with the County under a confidential cover and is not subject to Public Records requests.
3. If preservation in place or reburial is not feasible, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Tribe, and the Luiseño Native American Monitor and approved by the County Archaeologist prior to implementation. There shall be no destructive or invasive testing on sacred items, burial goods, and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Monitoring Report. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the Planning & Development Services Director for decision. The Planning & Development Services Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe.
4. Human Remains.
- a. The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
 - b. Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken off-site for evaluation, they shall be accompanied by the Luiseño Native American monitor.
 - c. If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
 - d. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
 - e. The MLD may, with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods.

The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.

- f. Public Resources Code §5097.98, CEQA §15064.5, and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
5. Tribal Cultural Resources: If tribal cultural resources are discovered, the Project Archaeologist shall conduct consultation with culturally-affiliated tribes to determine the most appropriate mitigation. Should the two parties not be able to reach consensus, then the County Archaeologist shall consider the concerns of the culturally-affiliated tribe and the Project Archaeologist, and the Director of Planning & Development Services shall make a final decision regarding appropriate mitigation.
6. Fill Soils
 - a. The Project Archaeologist and Luiseño Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.

C. Rough Grading

1. Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe that requests a copy.

D. Final Grading

1. Final Report. A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center and any culturally-affiliated tribe that requests a copy.
2. Cultural Material Conveyance
 - a. The final report shall include evidence that all Native American cultural materials, in order of preference, have been conveyed as follows:
 - i. Evidence that all prehistoric materials collected during the archaeological monitoring program have been reburied.
 - or
 - ii. Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources

have been repatriated identifying that the archaeological materials have been received.

- E. The final report shall include evidence that all historic materials have been curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

With the implementation of the mitigation measures described above, impacts would be reduced to less than significant.

In addition, implementation of future projects in the project vicinity would be required to comply with applicable regulations and implement required mitigation measures. The project would result in a less than significant impact with mitigation. Therefore, the project, together with other cumulative projects, would not contribute to cumulatively considerable impact related to archaeological resources. **Impacts would be less than significant with mitigation incorporated.**

- c) Disturb any human remains, including those interred outside of formal cemeteries?

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

Discussion/Explanation: The discussion below is based on the Cultural Resources Survey Report prepared for the project (HELIX 2025; Appendix B).

Less Than Significant Impact. Based on an analysis of records and a survey of the property overseen by County of San Diego approved archaeologists, Mary Robbins-Wade and Theodore G. Cooley, it has been determined that the project would not disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. The results of the survey are provided in an archaeological survey report entitled, Karve Ski Park Project – Cultural Resources Survey Report (June 2024).

Therefore, impacts would be less than significant.

In addition, implementation of future projects in the project vicinity would be required to comply with applicable regulations and implement required mitigation measures. The project would result in a less than significant impact. Therefore, the project, together with other cumulative projects, would not contribute a cumulatively considerable impact related to human remains. **Impacts would be less than significant.**

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?

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

Discussion/Explanation: Energy use associated with the project was calculated as part of the greenhouse gas (GHG) modeling detailed in Section VIII (HELIX 2024b; Appendix C).

Less Than Significant Impact. During construction, energy use would occur in two general categories: fuel use from vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. Workers associated with project construction would generate trips during the building construction phase. Fuel consumption associated with construction worker commute would be similar to any other typical commute in the County. Fuel use associated with construction workers and materials delivery during construction is necessary to get workers and building materials to the project site and is not considered to be wasteful, inefficient, or unnecessary.

The project would be required to install solar panels and a battery energy storage system in accordance with Title 24 Building Energy Efficiency Standards, resulting in lower project energy demand from the State's electrical grid. In addition, the project would result in a reduction of total regional vehicle miles traveled (VMT)-related transportation energy use by providing a local facility that would reduce longer vehicle trips to farther ski facilities, as described further in Section XVII, Transportation. Additionally, the project has been designed to be all-electric and meet Title 24 EV parking voluntary measures by providing a minimum of 45 of the project's 146 parking spaces with EVCS and EVSE spaces. Therefore, the project would not result in wasteful, inefficient, or unnecessary energy usage, and cumulative and project-level **impacts would be less than significant.**

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

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

Discussion/Explanation:

Less Than Significant Impact. The project is consistent with the General Plan designation for the site and would not conflict with or obstruct a state or local plan for renewable energy efficiency. As stated above in Section VI(a), the project would be built in compliance with Title 24 Building Energy Efficiency Standards and would reduce regional VMT-related transportation energy use. The project would not conflict with energy reduction policies of the County General Plan, including COS-14.3, which requires new development to implement sustainable practices to conserve energy. Through compliance with the 2022 Building Energy Efficiency Standards at

the time of project construction, the project would implement energy reduction design features and comply with the most recent energy building standards consistent with applicable plans and policies, as described above in Section VI(a). **Impacts would be less than significant.**

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.

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

Discussion/Explanation:

No Impact: The project site is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. Therefore, there would be no impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this project. **No impact would occur.**

- ii. Strong seismic ground shaking?

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

Discussion/Explanation:

Less Than Significant Impact: The project site would be subject to seismic ground shaking in the event of an earthquake, like the rest of San Diego County. To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. Compliance with the California Building Code would ensure the project would not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking. **Impacts would be less than significant.**

iii. Seismic-related ground failure, including liquefaction?

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

Discussion/Explanation:

Less Than Significant Impact: The project site is not within a “Potential Liquefaction Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that the liquefaction potential at the site is low. In addition, the site is not known to be underlain by poor artificial fill or located within a floodplain. Therefore, there would be a less than significant impact from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction. In addition, since liquefaction potential at the site is low, earthquake-induced lateral spreading is not considered to be a seismic hazard at the site. **Impacts would be less than significant.**

iv. Landslides?

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

Discussion/Explanation:

Less Than Significant Impact: The site is located within a “Landslide Susceptibility Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (County 2023). Landslide risk areas from this plan were based on data including steep slopes (greater than 25 percent); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15 percent in grade because these soils are slide prone. A small portion of the site west of run 2 (see Figure 3) contains a slope of 25.5 percent, but the majority of the project would not contain steep slopes. The boulders on the southern end of the site would be removed upon project development, and there would be no debris that could cause damage in the event of an earthquake. The area does not show evidence of either pre-existing or potential conditions that could become unstable and result in landslides. Therefore, there would be no potentially significant impact from the exposure of people or structures from adverse effects of landslides. **Impacts would be less than significant.**

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

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

Less Than Significant Impact: According to the Soil Survey of San Diego County, the soils on-site are identified as Fallbrook sandy loam and Placentia sandy loam, both of which have a soil erodibility rating of “moderate” as indicated by the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. However, the project would not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project would not result in unprotected erodible soils, would not alter existing drainage patterns, and would not develop steep slopes with habitable structures.
- The project has prepared a Storm Water Quality Management Plan (SWQMP) dated February 14, 2025 (Excel Engineering 2025a). The plan includes biofiltration BMPs to ensure sediment does not erode from the project site.
- The project would be required to comply with the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE – EROSION PREVENTION) and 87.417 (PLANTING). Compliance with these regulations minimizes the potential for soil erosion.

Due to these factors, the project would not result in substantial soil erosion or the loss of topsoil on a project level.

In addition, the project would not contribute to a cumulatively considerable impact because all the of past, present and future projects that involve grading or land disturbance are required to follow the requirements of the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE – EROSION PREVENTION) and 87.417 (PLANTING); Order 2001-01 (NPDES No. CAS 0108758), adopted by the San Diego Region RWQCB on February 21, 2001; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) (Ord. No. 9424); and County Storm water Standards Manual adopted on February 20, 2002, and amended January 10, 2003 (Ordinance No. 9426). **Impacts would be less than significant.**

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

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

Discussion/Explanation:

Less Than Significant Impact: These issues are discussed in Section VII(a) above, which found impacts to be less than significant. The County does not have any known occurrences of

lateral spreading. Collapse occurs when large boulders become unstable and move down slope; however, any boulders currently existing on the project site would be removed during project construction. Collapse would not occur, and the project would not contribute to a significant cumulative impact. **Impacts would be less than significant.**

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

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

Discussion/Explanation: The discussion below is based on the SWQMP prepared for the proposed project (Excel Engineering 2025a).

Less Than Significant Impact: As described in the SWQMP prepared for the project, an expansion index test was performed on soil samples from the project site. The test indicated that the samples were non-expansive according to the 2019 California Building Code expansion classification, and the American Society for Testing and Materials soil expansion classification was very low. These soils have a low shrink-swell behavior and represent no substantial risks to life or property. Therefore, the project would not create a substantial risk to life or property. **Impacts would be less than significant.**

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?

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

Discussion/Explanation:

Less Than Significant Impact: The project proposes to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. The project involves replacing the existing on-site septic system with a septic dispersal system. Leach fields are proposed in the northeast corner of the project site. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OSWS "to ensure that systems are adequately designed, located, sized, spaced, constructed, and maintained." The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities. DEH has reviewed the OSWS lay-out for the project pursuant to DEH, Land and Water Quality Division's, "On-site Wastewater Systems: Permitting Process and Design Criteria." DEH approved the project's OSWS on July 22, 2024. Therefore, the project has soils capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems as determined by the authorized, local public agency. In addition, the project would comply with the

San Diego County Code of Regulatory Ordinances, Title 6, Div. 8, Chap. 3, Septic Tanks and Seepage Pits. **Impacts would be less than significant.**

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

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

Discussion/Explanation: Impacts to paleontological resources occur when excavation activities encounter fossiliferous geological deposits and cause physical destruction of fossil remains. Fossil remains, fossil sites, fossil-producing geologic formations, and geologic formations with the potential for containing fossil remains are all considered paleontological resources or have the potential to be paleontological resources. Fossil remains are considered important if they are well preserved, identifiable, type/topotypic specimens, age diagnostic, useful in environmental reconstruction, and/or represent new, rare, and/or endemic taxa. The potential for impacts on fossils depends on the sensitivity of the geologic unit and the amount and depth of grading and excavation.

Less Than Significant Impact: The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources, nor does the site support any known geologic characteristics that have the potential to support unique geologic features. Similarly, the County's Guidelines for Determining Significance for Paleontological Resources places the project site in an area with no paleontological resource potential or sensitivity. As such, a paleontological monitoring program would not be required. Therefore, the project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. **Impacts would be less than significant.**

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?

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

Discussion/Explanation:

The discussion below is based on the Greenhouse Gas Emissions Technical Report for the project (HELIX 2024b; Appendix C).

Less Than Significant Impact: GHG emissions are said to result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are

now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels. 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 analysis contained within this report was initiated prior to the County's approval of its revised Final Draft Climate Action Plan. At the time, the County did not have locally adopted screening criteria or GHG thresholds. Therefore, the determination of the significance of the project's GHG emissions are based on the land use development project level thresholds and guidance adopted by the Bay Area Air Quality Management District on April 20, 2022 (BAAQMD; 2022). BAAQMD's GHG emissions thresholds are largely reflective of several of the County Climate Action Plan's overarching goals, including building decarbonization and the electrification of the on-road vehicle fleet. The BAAQMD's thresholds evaluate a project based on its effect on California's efforts to meet the State's long term climate goals instead of setting a quantifiable threshold. The thresholds are as follows:

- A. Projects must include, at a minimum, the following project design elements:
 - 1. Buildings
 - a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
 - b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
 - 2. Transportation
 - a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
 - i. Residential projects: 15 percent below the existing VMT per capita
 - ii. Office projects: 15 percent below the existing VMT per employee
 - iii. Retail projects: no net increase in existing VMT
 - b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.
- B. Projects must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

Regarding threshold A, the project would be required to install solar panels and a battery energy storage system in accordance with the Title 24 Building Energy Efficiency Standards, resulting in lower project energy demand from the State's electrical grid. Additionally, the project has been designed to be all-electric and meet the California Green Building Standards Code (CALGreen) Tier 2 EV parking voluntary measures by providing a minimum of 45 of the project's 146 parking spaces with EVCS and EVSE spaces in accordance with the BAAQMD GHG reduction design elements 1.a. and 2.b. As discussed in Section VI(a) above, the project would not result in any wasteful, inefficient, or unnecessary energy usage and would therefore be consistent with design

element 1.b. While the project does not fall into one of the land use categories listed in 2.a. (i.e., residential, office, retail), Section XVII(b) concludes that the project would result in a lower VMT than the regional average. Therefore, the project would be consistent with design element 2.a. Section VIII(b) below discusses the project's consistency with local GHG reduction plans and policies – the project would not conflict with any GHG reduction strategies and would therefore be consistent with threshold B above. As such, impacts related to GHG emissions would be less than significant. While GHG emissions from individual projects could result in significant, cumulative impacts with respect to climate change, the project's GHG emissions would be less than significant and less than cumulatively considerable. **Impacts would be less than significant.**

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

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

Discussion/Explanation:

The discussion below is based on the Greenhouse Gas Emissions Technical Report for the project (HELIX 2024b; Appendix C).

Less Than Significant Impact: As discussed in Section VIII(a) above, the project would contribute its “fair share” towards achieving California’s post-2020 GHG reduction goals and zero carbon goals outlined in the CARB 2022 Scoping Plan. The project would implement all-electric design and supply EV charging infrastructure beyond minimum requirements. **Impacts would be less than significant.**

IX. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

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

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

Discussion/Explanation:

Less Than Significant Impact: The project is a synthetic ski park that would not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of hazardous substances. Limited quantities of hazardous materials such as gasoline, diesel, oils, and lubricants may be required to operate the construction equipment. However, the project would not result in a significant hazard to the public or environment because storage, handling, transport, emission, and disposal of hazardous substances would be in compliance with local, State, and Federal regulations. California Government Code § 65850.2 requires that no final certificate of occupancy or its substantial

equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, §25500-25520.

The project does not propose to demolish any existing structures on-site and therefore would not create a hazard related to the release of asbestos, lead-based paint or other hazardous materials from demolition activities.

Therefore, due to the strict requirements that regulate hazardous substances outlined above, the project would not result in any potentially significant impacts related to the routine transport, use, and disposal of hazardous substances or related to the accidental explosion or release of hazardous substances. **Impacts would be less than significant.**

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

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

Discussion/Explanation:

Less Than Significant Impact: As discussed in Section IX(a) above, limited quantities of hazardous materials such as gasoline, diesel, oils, and lubricants may be required to operate the construction equipment. Construction activities would be short-term, and the use of these materials would cease once construction is complete. The hazardous substances used during construction would be required to comply with existing federal, state, and local regulations regarding the use and disposal of these materials. In the event of an accidental release during construction containment and clean up would be in accordance with existing applicable regulatory requirements.

As discussed in Section IX(a) above, the project would not involve the routine transport, storage, use, or disposal of hazardous materials during operation, so an accident involving hazardous materials is not likely. **Impacts would be less than significant.**

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

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

Discussion/Explanation:

No Impact: The project would not emit hazardous emissions or handle hazardous materials and the project is not located within one-quarter mile of an existing or proposed school. Therefore, the project would not affect an existing or proposed school. The project would not contribute to

a cumulatively considerable impact regarding hazardous materials. **No impact would occur.**

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

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

Discussion/Explanation:

No Impact: Pursuant to Government Code Section 65962.5 (Cortese List) requirements, the State Water Resources Control Board (SWRCB) GeoTracker database and the California Department of Toxic Substances Control (DTSC) EnviroStor database were searched for information regarding hazardous materials sites located in the project area. According to these searches, the project site has not been subject to a release of hazardous substances that would create a significant hazard to the public or environment. The project is not located within 1,000 feet of a known hazardous materials site and is not otherwise known to have been subject to a release of hazardous substances. **No impact would occur.**

- 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?

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

Discussion/Explanation:

Less Than Significant Impact: The southern half of the project site is located within the Airport Influence Area (AIA) for the McLellan-Palomar Airport. However, the proposed project is not within the overflight zone, nor is it in the aviation easements, safety, Federal Aviation Administration (FAA) Height Notification, or noise boundaries for the airport. Regardless, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a potential safety hazard to aircraft and/or operations from an airport or heliport. As a result, the project would not result in hazards to airport safety or surrounding land uses. **Impacts would be less than significant.**

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

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

Discussion/Explanation:

Less Than Significant Impact: The following sections summarize the project's consistency with applicable emergency response plans or emergency evacuation plans.

i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

The San Diego County Nuclear Power Station Emergency Response Plan would not be interfered with by the project due to the location of the project, plant, and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

The Oil Spill Contingency Element would not be interfered with because the project is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

The Emergency Water Contingencies Annex and Energy Shortage Response Plan would not be interfered with because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

The Dam Evacuation Plan would not be interfered with because the project is not located within a dam inundation zone.

Impacts would be less than significant.

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

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

The discussion below is based on the Fire Protection Plan prepared for the project (Dudek 2024; Appendix D).

Discussion/Explanation:

Less Than Significant Impact: The proposed project is completely surrounded by urbanized areas and/or irrigated lands and no wildlands are adjacent to the project. However, the project is in the Very High Fire Hazard Severity Zone (VHFHSZ) and is required to prepare a Fire Protection Plan (Appendix D; Dudek 2024). The site would provide adequate infrastructure, such as a five-foot wide firefighter pathway and driveway openings at least 24 feet wide, to accommodate emergency response equipment. The project applicant would be required to clearly post an emergency fire plan for all employees, vendors, and guests to see. Moreover, the project would not contribute to a cumulatively considerable impact, because past, present, and future projects in the surrounding area are required to comply with the Consolidated Fire Code. As a result, the project is not expected to expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires. **Impacts would be less than significant.**

- h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

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

Discussion/Explanation:

No Impact: The project includes the development of a synthetic ski park. The project does not involve or support uses that allow water to stand for 72 hours or more (e.g., artificial lakes, agricultural irrigation ponds). Also, the project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facilities, or other similar uses. The leach ponds associated with the project's wastewater treatment system would treat human waste by allowing sewage to percolate through the soil but would not create standing water above ground. Therefore, the project would not substantially increase current or future residents' exposure to vectors, including mosquitoes, rats or flies. **No impact would occur.**

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?

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

Discussion/Explanation: The following technical studies have been prepared for the project:

- PDP – SWQMP prepared by Excel Engineering, dated February 2025 (Excel Engineering 2025)
- PDP – Hydrology Study prepared by Excel Engineering, dated May 2025 (Excel Engineering 2025b)

Less Than Significant Impact: Projects have the potential to generate pollutants during both construction and operation.

A SWQMP was prepared by Excel Engineering, consistent with the requirements of the County BMP Design Manual. The BMP Design Manual is a design manual for compliance with local County Watershed Protection Ordinance (Sections 67.801 et seq.) and regional Municipal Separate Storm Sewer Systems Permit (MS4; RWQCB San Diego Region Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9- 2015-0100) requirements for storm water management. The SWQMP includes a list of required construction BMPs that would be implemented by the project. Such BMPs include, but would not be limited to, biofiltration, vegetation stabilization planting, bonded fixed matrix, silt fences, storm drain inlet protection, stabilized construction entrance, street sweeping, material delivery and storage, spill prevention and control, waste management concrete waste management, solid waste management, and sanitary waste management that would prevent soil erosion and loss of topsoil. The project would introduce landscaping to stabilize and preserve soils in the post-project condition.

In addition, the proposed project is required to obtain a NPDES General Permit for Discharges of Storm Water Associated with Construction Activities. The minimum required construction BMPs would include hydraulic stabilization hydroseeding, silt fences, stabilized construction entrance, materials management, and waste management. Compliance with the required NPDES permit would reduce stormwater runoff from the project site by promoting infiltration,

minimizing impervious surfaces, and require a no net increase in flows over the existing condition through hydromodification processes. Two biofiltration basins are proposed in the northwest portion of the property to collect and treat runoff from the project site. In addition, the project would continue to implement existing pollution prevention measures, such as pesticide control and proper trash and recycling disposal, in order to preserve water quality in the following buildout of the project. Therefore, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and impacts would be less than significant.

Finally, the project's conformance to the waste discharge requirements listed above ensures the project would not create cumulatively considerable water quality impacts related to waste discharge because, through the permit, the project would conform to Countywide watershed standards in the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP), derived from State regulation to address human health and water quality concerns. Therefore, the project would not contribute to a cumulatively considerable impact to water quality from waste discharges. **Impacts would be less than significant.**

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

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

Discussion/Explanation: The analysis below relies on the Groundwater Use Estimates Review form supplied by the County's Sustainability Planning Division (County 2024; Appendix E).

Less than Significant Impact: The project would use groundwater to water project slopes, the tubing lanes, and project landscaping. As stated in the Groundwater Use Estimates Review form, the project would use an estimated 3,441,343 gallons per year. Compared to existing conditions, which includes a driving range with maintained grass, the proposed project would reduce groundwater usage on the site by approximately 50 percent, from 6,891,000 gallons annually. In addition, the project does not involve operations that would interfere substantially with groundwater recharge including, but not limited to the following: the project does not involve regional diversion of water to another groundwater basin; or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g., ¼ mile). These activities and operations can substantially affect rates of groundwater recharge. **Impacts would be less than significant.**

- 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 surface, in a manner which would:
- (i) result in substantial erosion or siltation on- or off-site;
- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project proposes a synthetic ski park. As outlined in the SWQMP dated November 9, 2023, the project would implement site design measures, source control, and/or treatment control BMPs to reduce potential pollutants, including sediment from erosion or siltation to the maximum extent practicable from entering storm water runoff. Specifically, the project would include two biofiltration basins to collect and treat stormwater runoff before it is released to the public storm drain system. Tree wells would be incorporated to direct storm water runoff toward permeable soil and reduce off-site flows. Hydroseeding would be conducted in the summer months to increase grass cover on the project site and reduce soil erosion. These measures would control erosion and sedimentation and satisfy waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego Municipal Permit (SDRWQCB Order No. R9-2007-0001), as implemented by the San Diego County JURMP and SUSMP. The SWQMP specifies and describes the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in on-site and downstream drainage swales. The Department of Public Works would ensure that the Plan is implemented as proposed. Due to these factors, the project would not result in significantly increased erosion or sedimentation potential and would not alter any drainage patterns of the site or area on- or off-site. In addition, because erosion and sedimentation would be controlled within the boundaries of the project, the project would not contribute to a cumulatively considerable impact. For further information on soil erosion refer to Section VII(b). **Impacts would be less than significant.**

- (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

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

Discussion/Explanation:

Less Than Significant Impact: The project site currently drains primarily by overland flow westerly to North Centre City Parkway to an open channel and culvert under Tierra Libertia Road. As described in the project's SWQMP (Excel Engineering 2025), the project would implement stormwater improvements but would not modify on-site drainage patterns. Post-development, the majority of surface flows would continue to travel to the northwest corner of

the project site to one of the two project discharge points. Minor quantities of runoff would continue to flow to the other discharge point at the southern portion of the property. Pre-development flows are 70.9 cubic feet per second (cfs) at the northwest side of the project and 5.0 cfs at the south side of the project. After implementation of the project, which would include a pure storage component at the base of the ski run, flows would be 67.7 cfs to the northwest and 4.7 cfs to the south. Therefore, the proposed improvements would result in a decrease of runoff generated during the peak of the 100-year, 6-hour storm. Additionally, required BMPs would be implemented consistent with the requirements of the County BMP Design Manual during construction to control storm flows. Therefore, the project would not substantially alter the existing drainage pattern in a manner that would substantially increase the rate or amount of surface runoff, which would result in flooding on or off-site, and impacts would be less than significant.

Moreover, the project would not contribute to a cumulatively considerable alteration or a drainage pattern or increase in the rate or amount of runoff, because the project would not substantially increase water surface elevation or runoff exiting the site, as detailed above. Future projects in the project vicinity would be subject to federal, state, and local regulations, including the NPDES permit, which are designed to reduce stormwater runoff from project sites by promoting infiltration, minimizing impervious surfaces, and requiring a no-net increase in flows over the existing condition through hydromodification processes. Any short-term impacts resulting from alterations of drainage and hydrology resulting in substantial erosion or siltation on- or off-site would be minimized with the incorporation of required construction BMPs and operational compliance with the San Diego MS4 Permit. Therefore, the project's contribution would not be cumulatively considerable. **Impacts would be less than significant.**

(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

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

Discussion/Explanation:

Less Than Significant Impact: The project would implement construction and operational BMPs to protect water quality as established in the SWQMP prepared for the project and would have a less than significant impact with regard to additional sources of polluted runoff. As described in Section X(c)(i) above, the project would not modify on-site drainage patterns, but the discharge points at North Centre City Parkway and Jesmond Dene Road would remain the same post construction. The proposed improvements would result in a decrease in generated runoff during the peak of the 100-year, 6-hour storm, as discussed in Section X(c)(ii) above. On-site flows would be reduced from 70.9 cfs to 67.7 cfs at the northwest discharge point and from 5.0 cfs to 4.7 cfs at the southern discharge point. In addition, the diversion of flow would not over-capacitate the gutter, curb inlet, and the existing storm drain system. Therefore, the project would not substantially alter the existing drainage pattern in a manner that would substantially increase the rate or amount of surface runoff, which would exceed the capacity of the existing or planned storm drain system conveyances. **Impacts would be less than significant.**

(iv) impede or redirect flood flows?

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

Discussion/Explanation:

Less Than Significant Impact: Refer to Section X(c)(i) through (iii). The Hydrology Study prepared for the project (Excel Engineering 2025b) demonstrates that the project would not impede or redirect flood flows. The project would reduce generated runoff during the peak of the 100-year, 6-hour storm and would not substantially alter the drainage pattern on the site. Appropriate BMPs would be included, including a pure storage component at the base of the ski run, to adequately slow project runoff. Therefore, the project would not impede or redirect flows.

Impacts would be less than significant.

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

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

Discussion/Explanation:

Less Than Significant Impact: The project is not located within a Federal Emergency Management Agency (FEMA) special flood zone. The project site is located more than 20 miles from the coast; therefore, in the event of a tsunami, the project site would not be inundated. Likewise, given that the project site is not located near a large standing body of water, inundation by seiche (or standing wave) is considered negligible. The project site is relatively flat with only a small area containing steep slopes and does not contain slopes subject to mudflows; therefore, potential impacts related to release of pollutants due to inundation are determined to be less than significant. Overall, the project would not result in flood hazard, tsunami, or seiche zones, or risk release of pollutants due to project inundation. **Impacts would be less than significant.**

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

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

Discussion/Explanation:

Less Than Significant Impact: As described in Section X(a) above, the project would implement required BMPs consistent with the requirements of the County BMP Design Manual during construction to preserve water quality. The project includes two biofiltration basins at the northwest corner of the property to treat storm water and preserve water quality during operation. Additionally, a pure storage component would be included at the base of the ski run to slow project runoff before draining to one of the two biofiltration basins. These measures would slow runoff from the project site, control erosion and sedimentation, and satisfy waste discharge requirements. The SWQMP (Excel Engineering 2025) specifies and describes the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any on-site and downstream drainage swales. The proposed BMPs are consistent with regional surface water, storm water and groundwater planning and permitting process that have been established to improve the overall water quality in County watersheds and would ensure that the project is consistent with the Water Quality Control Plan for the San Diego Basin. The project site would be in compliance with the San Diego Basin Water Quality Control Plan and is not located within a County Sustainable Groundwater Management Act or Groundwater Sustainability Plan basin area. See Section X(a) through (d). Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Impacts would be less than significant.

XI. LAND USE AND PLANNING -- Would the project:

- a) Physically divide an established community?

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

Discussion/Explanation:

No Impact: The project does not propose the introduction of new infrastructure such as major roadways or water supply systems, or utilities to the area, and would not include any features that could physically divide a community. Therefore, the proposed project would not significantly disrupt or divide the established community. **No impact would occur.**

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

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

Discussion/Explanation:

Less Than Significant Impact. The proposed project is subject to the General Plan Semi-Rural Regional Category and contains lands within the SR-1 Land Use Designation. The project is also subject to the policies of the North County Metro Subregional Plan. The property is zoned A70, which permits recreational uses with a MUP pursuant to the Zoning Ordinance Section 2700. Additionally, as stated throughout this Initial Study, the project would not conflict with plans or policies relating to air quality, biological resources, or other environmental effects. Therefore, the project would not conflict with applicable land use plans, policies, or regulations. **Impacts would be less than significant.**

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?

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

Discussion/Explanation:

Less Than Significant Impact: The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 2017) as an area of “Potential Mineral Resource Significance” (Mineral Resource Zone [MRZ]-3). However, the project site is surrounded by developed land uses, including housing and the I-15 freeway, which are incompatible with future extraction of mineral resources on the project site. The site is not designated or zoned for mineral extraction and no such operations have occurred at the site or surrounding area. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses. **Impacts would be less than significant.**

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

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

Discussion/Explanation:

No Impact: According to the County's Guidelines for Determining Significance for Mineral Resources, the project site is not located in an area that has MRZ-2 designated lands or is located within 1,300 feet of such lands. Therefore, the proposed project would not result in the loss of availability of locally important mineral resource(s). **No impact would occur.**

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?

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

Discussion/Explanation: An Acoustical Analysis Report was prepared by HELIX for the project, dated November 2024 (HELIX 2024c; Appendix F).

The County of San Diego General Plan Noise Element, Tables N-1 and N-2 addresses noise-sensitive areas and requires an acoustical study to be prepared for any use that may expose noise-sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 A-weighted decibels (dBA). Moreover, if the project is in excess of 60 dBA CNEL or 65 dBA CNEL, modifications must be made to the project to reduce noise levels. Noise-sensitive areas include residences, hospitals, schools, libraries, or similar facilities as mentioned within Tables N-1 and N-2. Noise-sensitive land uses (NSLU) in the project vicinity include single-family residences adjacent to the project's eastern boundary and across Jesmond Dene Road, approximately 200 feet south.

The project is also subject to the County Noise Ordinance which regulates temporary construction noise associated with the project, Sections 36.408 and 36.409. Section 36.409 of the County Noise Ordinance states that construction noise shall not exceed 75 dBA at the property line during an 8-hour period between 7 a.m. to 7 p.m. It is unlawful to operate construction equipment between 7 p.m. and 7 a.m. and no work shall be done on Sundays and Holidays, per Section 36.408.

Less Than Significant With Mitigation Incorporated: The project is a synthetic ski park and would be occupied by employees and visitors during the hours of operation. As described in the project's Acoustical Analysis (Appendix F; HELIX 2024c), the surrounding area supports agricultural uses and single-family homes occupied by residents.

Construction Noise

The project would produce varying noise levels during project construction depending on the location and equipment used. Table 3, *Construction Noise Levels*, shows the calculated noise level for each phase of project construction.

Table 3. Construction Noise Levels

Construction Phase/Activity	Equipment Used Simultaneously	Average Distance to Nearest Property Boundary Line (feet)	Resulting 1-Hour L _{EQ} at Nearest Property Boundary Line (dBA)
Site Preparation	Bulldozer, Backhoe	180	68.0
Bunny Hill Grading/Excavation	Excavator, Grader	70	79.5
Remaining Site Grading/Excavation	Excavator, Grader	180	71.3
Building Construction	Front End Loader ¹ , Generator	180	68.4
Paving	Paver, Roller	70	73.7
Architectural Coating	Air Compressor	180	62.6

Source: HELIX 2024c

¹Forklifts are not included in the RCNM equipment list. Therefore, forklifts were modeled as front-end loaders, which perform similar multi-task functions but are typically larger and noisier than forklifts.

NSLU = noise-sensitive land use; dBA = A-weighted decibels; L_{EQ} = time-averaged noise level

As shown in Table 3, the project is anticipated to generate noise levels exceeding the County's standard of 75 dBA equivalent sound level (LEQ) (8-hour) during the grading/excavation phase of the bunny hill. Remaining construction phases are not anticipated to generate noise levels exceeding the County's standard of 75 dBA LEQ (8-hour). The project noise level calculations presented in Table 3 are one-hour average noise levels. These noise levels, therefore, provide a conservative estimate of the eight-hour average noise level for comparison with the County construction noise limit, as it is unlikely that the loudest equipment, a bulldozer, would be used for all eight hours during any single construction workday. However, implementation of Mitigation Measure NOI-1 would be required to reduce construction noise levels to within County limits. Project-level and cumulative **impacts would be less than significant with mitigation incorporated.**

MM-NOI-1 Construction Noise Management Plan. Noise levels from project-related construction activities shall not exceed the noise limit specified in Section 36.409 of the County of San Diego Code of Regulatory Ordinances of 75 dBA L_{EQ} (8-hour), when measured at the boundary line of the property where the noise is located or any occupied property where noise is being received. A Construction Management Plan that describes the measures included on the construction plans to ensure compliance with the noise limit shall be prepared by the project applicant and submitted to the County for approval prior to issuance of the construction permit. The following measures may be included to reduce construction noise:

- Construction equipment to be properly outfitted and maintained with manufacturer-recommended noise-reduction devices.

- Diesel equipment to be operated with closed engine doors and equipped with factory-recommended mufflers.
- Mobile or fixed “package” equipment (e.g., arc-welders and air compressors) to be equipped with shrouds and noise control features that are readily available for that type of equipment.
- Electrically powered equipment to be used instead of pneumatic or internal-combustion powered equipment, where feasible.
- Unnecessary idling of internal combustion engines (e.g., in excess of 5 minutes) to be prohibited.
- Material stockpiles and mobile equipment staging, parking, and maintenance areas to be located as far as practicable from noise sensitive receptors.
- The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
- Temporary sound barriers or sound blankets may be installed between construction operations and adjacent noise-sensitive receptors. Due to equipment exhaust pipes being approximately 7 to 8 feet above ground, a sound wall at least 10 feet in height above grade, to block the line-of-sight between project construction activities and residences along the eastern property lines. These barriers would mitigate noise levels to acceptable levels. To effectively reduce noise levels, the sound barrier should be constructed of a material with a Sound Transmission Class (STC) rating of 22 or 23 with no gaps or perforations and remain in place until the conclusion of construction activities.
- The project applicant shall notify residences within 100 feet of the project’s property line in writing within one week of any construction activity. The notification shall describe the activities anticipated, provide dates and hours, and provide contact information with a description of a complaint and response procedure.
- The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process for the affected resident shall be established prior to construction commencement to allow for resolution of noise problems that cannot be immediately solved by the site supervisor.

Operational Noise

The project is a synthetic ski park that would generate noise associated with human activity when skiing down the ski slope, bunny hill, and gliding along the zipline. Mechanical noise is anticipated to be generated by the motor of the Magic Carpet™ lift system, live non-amplified music inside of Building B, and building mechanical systems, such as commercial-sized HVAC units mounted on the building roofs. As described in the project’s Acoustical Analysis, modeling

was conducted to predict the project's operational noise levels at receivers near the project site. A 10 feet noise attenuation barrier is proposed along the project's eastern boundary (Figure 3) and was included in project modeling. The acoustic barrier would be 855 feet long and constructed of masonry, wood, plastic, fiberglass, steel, or a combination of those materials. The project would not require off-site improvements. Because all park activities are expected to occur beyond 10 p.m., the results of the on-site operational model are compared to the nighttime County standard in Table 4, *On-Site Operational Noise Levels*, below.

Table 4. On-Site Operational Noise Levels

Receiver ID ¹	Receiver Description ²	Project Operational Noise, 1-hour L _{EQ} (dBA) ³	County Noise Limit ⁴	Exceeds Standard?
C1-PL	Plant Nursery Property Line	53.4	55 dBA L _{EQ}	No
R1-PL	Residential Property Line	36.0	45 dBA L _{EQ}	No
R1-O	Residential Outback Building	41.5	45 dBA L _{EQ}	No
R1-S	Residential Structure/Second Floor Window	39.3	45 dBA L _{EQ}	No
R2-PL	Residential Property Line	34.8	45 dBA L _{EQ}	No
R2-S	Residential Structure/Second Floor Window	42.3	45 dBA L _{EQ}	No
R3-PL	Residential Property Line	33.7	45 dBA L _{EQ}	No
R3-S	Residential Structure/Second Floor Window	36.3	45 dBA L _{EQ}	No
R4-PL	Residential Property Line	36.3	45 dBA L _{EQ}	No
R4-S	Residential Structure/Second Floor Window	33.5	45 dBA L _{EQ}	No

Source: HELIX 2024c

As shown in Table 4, noise from the project operations would not exceed the County noise standards with the 10-foot noise barrier and impacts would be less than significant.

The project would add 526 average daily trips (ADT) to local streets, but the project would not result in increased traffic noise levels and no perceptible (3 dBA) increase in traffic noise levels would occur (Appendix F; HELIX 2024c). **Impacts would be less than significant.**

b) Generation of excessive groundborne vibration or groundborne noise levels?

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

Discussion/Explanation:

Less Than Significant Impact: The operation of construction equipment generates vibrations that propagate through the ground and diminish in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction equipment with highest potential for vibration generation during general project construction activities would be a vibratory roller, which may be used for

compaction of soil beneath building foundations and could be used within 140 feet of the closest off-site residence east of the project site. Most usage of a vibratory roller, however, would occur at distances greater than 140 feet from any residence due to the mobile nature of its use across the project site. A vibratory roller creates approximately 0.210 inches per second (in/sec) peak particle velocity (PPV) at a distance of 25 feet (Caltrans 2020). A vibratory roller would generate a vibration level of approximately 0.032 in/sec PPV at a distance of 140 feet. This would be lower than the structural damage impact threshold to older structures of 0.5 inch per second PPV, and the Caltrans distinctly perceptible human response threshold of 0.04 in/sec PPV for continuous/frequent intermittent sources. Finally, the 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. Therefore, the project would not expose persons to or generate excessive groundborne vibration or groundborne noise levels on a project or cumulative level. Impacts associated with use of a vibratory roller (and other potential equipment) would be less than significant. **Impacts would be less than significant.**

- 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?

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

Discussion/Explanation:

Less Than Significant Impact: The proposed project is located within an Airport Land Use Compatibility Plan (ALUCP) for McClellan-Palomar Airport. However, the project is located outside of the CNEL 60 dBA contours for the airport. Therefore, project implementation is not expected to expose people residing or working in the project area to excessive noise levels in excess of the CNEL 60 dBA. the

In addition, there are no new or expanded public airports projects in the vicinity that may extend the boundaries of the CNEL 60 dB noise contour. Therefore, the project would not expose people residing or working in the project area to excessive airport-related noise on a project or cumulative level. **Impacts would be less than significant.**

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)?

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

Discussion/Explanation:

No Impact: The proposed project would not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including, but limited to the following: new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or Local Agency Formation Commission (LAFCO) annexation actions. **No impact would occur.**

- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

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

Discussion/Explanation:

No Impact: The proposed project would not displace any existing housing since the site is currently used for recreation. **No impact would occur.**

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 service ratios, response times or other performance objectives for any of the public services:

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

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

Discussion/Explanation:

a.i. Less Than Significant Impact. The Deer Springs Fire Protection District would be responsible for providing fire and emergency medical services to the project site. The Deer Springs Fire Station 2 is approximately 1 mile (driving distance) from the project site at 1321 Deer Springs Road. The project does not include residential units or other growth-inducing elements that would substantially increase the demand for fire protection and emergency medical services. Further, the project would be designed and constructed consistent with applicable codes and standards for access and fire suppression infrastructure. The project would not require the construction of a new fire station to maintain service ratios within the service area served by Deer Springs Fire Protection District. Therefore, the project would not result in the need for new or altered fire protection facilities. **Impacts would be less than significant.**

a.ii. Less Than Significant Impact. The project site is served by the San Diego County Sheriff's Department. The closest sheriff's station to the project site, the San Marcos Sub Station, is at 182 Santar Place, approximately 6 (driving distance) miles from the project site. The project does not propose uses that typically generate a demand for police protection services, such as residential development. Limited police protection may be required during project operation if theft or vandalism were to occur; however, these types of events would not affect police protection response times or substantially increase demand. The project is consistent with the Land Use Designation for the site and would not increase the population beyond what was anticipated in the General Plan. The construction of new police facilities and expansion of existing facilities would not be required to serve the project. **Impacts would be less than significant.**

a.iii. No Impact. The project would consist of a synthetic ski facility and would not generate new students. Therefore, the project would not result in the need for new or altered school facilities. **No impact would occur.**

a.iv. No Impact. The project would consist of a synthetic ski facility and would not directly generate a substantial new population requiring new park facilities (see Section XVI, Recreation). Therefore, the project would not generate a need for construction or expansion of recreational facilities. **No impact would occur.**

a.v. No Impact. The project would develop a synthetic ski facility that would not generate a substantial new population to utilize libraries or other public facilities. **No impact would occur.**

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?

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

Discussion/Explanation:

No Impact: The project does not propose any residential use, included but not limited to a residential subdivision, mobile home park, or construction for a single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. As a synthetic ski park, the project would provide additional recreational opportunities to the surrounding area. **No impact would occur.**

- 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?

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

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: The project involves a new synthetic ski park, which is a recreational facility. However, as outlined throughout this Initial Study, the new facilities would not result in adverse physical effect on the environment with implementation of Mitigation Measures CUL-1 and NOI-1. **Impacts would be less than significant with mitigation incorporated.**

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?

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

Discussion/Explanation: The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards and Mobility Element, the County of San Diego Transportation Impact Fee Program and the Congestion Management Program. The discussion below is based on the vehicle miles traveled (VMT) Analysis conducted for the proposed project (CR Associates 2023; Appendix G).

Less Than Significant Impact: The project includes development of a synthetic ski facility. The project would not have a direct impact related to a conflict with any plans, ordinances, or policies addressing the circulation system. Given that construction worker trips would be temporary and would be dispersed along different routes based on the origin of the trips, construction worker commuting is not expected to have a significant effect on the capacity of the transportation system. Operationally, the project is anticipated to reduce vehicle trips in the surrounding region by providing a local ski facility, thus minimizing the number of longer trips to farther ski facilities. The project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including public transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and public transit. The project would include a 5-foot irrevocable offer of dedication to the County on either side of the Jesmond Dene frontage for a trail which is within the mobility element standards. The project would not have a significant impact related to a conflict with any performance measures establishing measures of effectiveness of the circulation system because the project's VMT analysis complies with the County's Guidelines for Determining Significance for Impacts related to Traffic and Transportation. The project is a unique land use that is not included in typical VMT modeling data sources such as the SANDAG Travel Demand Model. In accordance with the County's Guidelines for Determining Significance for Traffic and Transportation, a qualitative analysis was performed that concluded that the project would provide recreational opportunities to the surrounding area and would lower regional VMT. 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 policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. **Impacts would be less than significant.**

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

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

Discussion/Explanation: The discussion below is based on the VMT Analysis (CR Associates 2023; Appendix G) conducted for the proposed project.

As stated in section 15064.3 (a), generally “vehicle miles traveled” is the most appropriate measure of transportation impacts. For purposes of this analysis, VMT refers to the amount and distance of automobile travel attributable to a project.

Less Than Significant Impact: The project would reduce VMT by providing a ski facility within San Diego County, thereby shortening the typical trips to farther, larger ski parks, such as Big Bear (San Bernardino County, approximately 145 miles away), Mammoth Lakes (Mono County, 400 miles away), and Lake Tahoe (Placer County, approximately 500 miles away). According to Section 15064.3 of the CEQA Guidelines, projects that decrease VMT in the project area compared to existing conditions can be presumed to have a less than significant transportation impact. **Impacts would be less than significant.**

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

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

Discussion/Explanation:

Less Than Significant Impact: The project would incorporate a line-of-sight easement and vegetation clearing to ensure that adequate sight distances are maintained when exiting the project driveway onto Jesmond Dene Road. The project would not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create or place curves, slopes or walls which impede adequate site distance on a road. **Impacts would be less than significant.**

d) Result in inadequate emergency access?

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

Discussion/Explanation:

No Impact: The project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the San Diego County Consolidated Fire Code, therefore, the project has

adequate emergency access. Additionally, roads used to access the project site would meet applicable County standards. **No impact would occur.**

XVIII. TRIBAL CULTURAL RESOURCES – Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or

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

Discussion/Explanation: The discussion below is based on the Cultural Resources Survey Report prepared for proposed project (HELIX 2025; Appendix B).

No Impact: The project site is largely undeveloped and would not require independent demolition activities; as a result, no historic buildings would be impacted by project development. Historic Highway 395 is located adjacent to the project area in the modern alignment of I-15; however, the proposed project would not directly or indirectly impact this resource. **No impact would occur.**

- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

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

Discussion/Explanation: The discussion below is based on the Cultural Resources Survey Report prepared for proposed project (HELIX 2025; Appendix B).

Less than Significant with Mitigation Incorporated: There are no previously recorded tribal cultural resources on site, and no impacts to tribal cultural resources are anticipated. However, the Sacred Lands File search conducted by the Native American Heritage Commission was positive for the project vicinity, and the San Luis Rey Band of Mission Indians provided detailed information about sacred cultural sites near the project site. Due to the archaeological sensitivity of the area, the project may inadvertently impact undiscovered significant tribal cultural deposits or features during grading. Mitigation Measure CUL-1 would reduce potentially significant impacts to below a level of significance. **Impacts would be less than significant with mitigation incorporated.**

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 stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

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

Discussion/Explanation:

Less Than Significant with Mitigation Incorporated:

Water

The project would connect to the existing Valley Center Municipal Water District water line in the northeast corner of the property. An existing well on-site would be used for irrigation purposes. All pipeline improvements and connections are evaluated as part of the project footprint. Consequently, potential impacts associated with construction of these water service connections have been evaluated throughout this IS/MND. As stated in Sections V and XVIII, the project has the potential to disturb sensitive archaeological resources during grading, but Mitigation Measure CUL-1 would reduce potentially significant impacts to below a level of significance. Therefore, the project would not require or result in the relocation or construction of new or expanded water facilities that would cause environmental effects. **Impacts would be less than significant with mitigation incorporated.**

Wastewater

The project is not located within a sewer district and would replace the existing septic system with a wastewater treatment system. Consequently, potential impacts associated with construction of these wastewater facilities have been evaluated throughout this IS/MND. As stated in Sections V and XVIII, the project has the potential to disturb sensitive archaeological resources during grading, but Mitigation Measure CUL-1 would reduce potentially significant impacts to below a level of significance. Therefore, the project would not require or result in the relocation or construction of new or expanded wastewater facilities that would cause environmental effects. **Impacts would be less than significant with mitigation incorporated.**

Stormwater

Stormwater runoff from new impervious areas constructed for the project would be treated via impervious area dispersion in compliance with the County's BMP Design Manual. Runoff from the buildings and parking lots would be directed towards the proposed biofiltration basin. No changes in the current drainage patterns are proposed. Design features that would direct flows towards adjacent pervious areas would be located within the project footprint. Consequently, potential impacts associated with drainage features have been evaluated throughout this IS/MND (refer to Section X, Hydrology and Water Quality). As stated in Sections V and XVIII,

the project has the potential to disturb sensitive archaeological resources during grading, but Mitigation Measure CUL-1 would reduce potentially significant impacts to below a level of significance. Therefore, the project would not require or result in the relocation or construction of new or expanded stormwater facilities that would cause environmental effects. **Impacts would be less than significant with mitigation incorporated.**

Natural Gas

The project would not include natural gas appliances or natural gas plumbing; therefore, the project would not require or result in the relocation or construction of new or expanded natural gas facilities that would cause environmental effects. **No impact would occur.**

Electric Power and Telecommunications

The project would connect to electrical and fiber optic infrastructure that already serves the project site. Connections to this infrastructure would be located within the project footprint. Consequently, potential impacts associated with these infrastructure connections have been evaluated throughout this IS/MND. As stated in Sections V and XVIII, the project has the potential to disturb sensitive archaeological resources during grading, but Mitigation Measure CUL-1 would reduce potentially significant impacts to below a level of significance. Therefore, the project would not require or result in the relocation or construction of new or expanded electric power or telecommunications facilities. **Impacts would be less than significant with mitigation incorporated.**

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

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

Discussion/Explanation:

Less Than Significant Impact. The project requires water service from the Valley Center Municipal Water District. Per the 2020 Urban Water Master Plan, the Valley Center Municipal Water District had a 2020 water supply of 16,737 acre-feet per year, or approximately 14,931,930 gallons per day (Valley Center Municipal Water District 2021). The project would use groundwater to water project slopes, the tubing lanes, and project landscaping. As stated in the Groundwater Use Estimates Review form (see Appendix E), the project would use an estimated 3,441,343 gallons per year. Compared to existing conditions, which includes a driving range with maintained grass, the proposed project would reduce groundwater usage on the site by approximately 50 percent, from 6,891,000 gallons annually. During the permitting phase, final grading and plumbing plans would be submitted along with anticipated domestic water usage to ensure availability exists. Therefore, the project would have sufficient water supplies available to serve the project. **Impacts would be less than significant.**

- 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?

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

Discussion/Explanation:

No Impact. The proposed project would rely completely on an on-site wastewater system (septic system) to treat the project's wastewater, which is estimated at 1,252,077 gallons per year in Appendix A of the project's Air Quality Technical Report (see Appendix A). Wastewater would be treated completely on-site; therefore, the project would not interfere with any wastewater treatment provider's service capacity. **No impact would occur.**

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

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

Discussion/Explanation:

Less Than Significant Impact: Implementation of the project would generate solid waste during construction and operation. The project would comply with the County's Construction and Demolition Ordinance, which requires construction and demolition projects to recycle, reuse, or donate 65 percent of all materials, including 90 percent of inert debris (concrete, asphalt, dirt, etc.). Additionally, grading projects must recycle or reuse 100 percent of excavated soils, trees, stumps, rocks, and vegetation. The project would comply with these requirements during project construction. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.). There are five permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs. **Impacts would be less than significant.**

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

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

Discussion/Explanation:

Less than Significant Impact: Implementation of the project would generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the CIWMB under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). The project would deposit solid waste at a permitted solid waste facility and therefore, would comply with Federal, State, and local statutes and regulations related to solid waste.

In October 2014, Governor Brown signed Assembly Bill (AB) 1826 Chesbro (Chapter 727, Statutes of 2014), requiring businesses to recycle their organic waste. On and after January 1, 2016, local jurisdictions across the state were required to implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings that consist of five or more units. Organic waste for the purposes of AB 1826, means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. The law phased in the requirements for businesses over time, while offering an exemption process for rural counties.

During construction, this project would be required to comply with the County Ordinance Section 68.508 through 68.518 (Diversion of Construction and Demolition Materials from Landfill Disposal). The ordinance requires a 70 percent diversion rate by the construction and demolition projects, which must include, at a minimum 90 percent diversion of inert material. The project would be in compliance with County ordinances upon submission of a Construction and Demolition Debris Management Plan before the issuance of a building permit. Project operations and waste management methods would be consistent with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements. The project would deposit solid waste at a permitted solid waste facility, and therefore, would comply with federal, state, and local statutes and regulations related to solid waste. **Impacts would be less than significant.**

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?

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

The discussion below is based on the Fire Protection Plan prepared for the project (Dudek 2024; Appendix D).

Discussion/Explanation:

Less Than Significant Impact: The project site is within the VHFHSZ as designated by the California Department of Forestry and Fire Protection (CAL FIRE). However, implementation of the project would not increase wildland fire risk at the site as compared to existing conditions. The project would replace the existing recreation use with a new recreational use that is consistent with the site's Land Use Designation and zoning with an MUP. The two project driveways and internal parking lot areas would be widened to 24 feet to allow adequate access for emergency vehicles. An additional dead-end emergency access driveway is located in the northeastern portion of the property and would be improved to a minimum of 24 feet in width. The project applicant would be required to clearly post an emergency fire plan for all employees, vendors, and guests to see. Therefore, the project would not impair an adopted emergency response plan or emergency evacuation plan. **Impacts would be less than significant.**

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

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

The discussion below is based on the Fire Protection Plan prepared for the project (Dudek 2024; Appendix D).

Discussion/Explanation:

Less Than Significant Impact: As discussed above in thresholds XX(b) and VII(a), the project is in the VHFHSZ and in an area containing slopes greater than 25 percent. However, the project would install standard fire safety features and construct buildings in compliance with the fire regulations in the CBC. Additionally, the project would be required to meet the Public Resources Code Section 4291 requirement to maintain a minimum 100-foot-wide fuel modification zone around all sides of a structure. Landscaping would be maintained so that a wildfire burning under average weather conditions would be unlikely to ignite structures. Therefore, the project would

not expose project occupants to pollutant concentrations or uncontrolled wildfires due to exacerbated wildfire risk. **Impacts would be less than significant.**

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

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

The discussion below is based on the Fire Protection Plan prepared for the project (Dudek 2024; Appendix D).

Discussion/Explanation:

Less Than Significant Impact: The project would construct recreation uses, and would not install infrastructure such as power lines, or other utilities that may exacerbate fire risk. If the project requires underground utility installation or connections, the utilities would be minimal and similar to the agricultural and residential uses in the surrounding area. Construction work would be both minimal and temporary and would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. Fuel breaks would be created around all grading, site work, and other construction activities in areas where there is flammable vegetation to prevent fires during construction. **Impacts would be less than significant.**

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

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

The discussion below is based on the Fire Protection Plan prepared for the project (Dudek 2024; Appendix D).

Discussion/Explanation:

Less Than Significant Impact: As discussed in thresholds VII(a)(iv) and X(c) above, the project would not be susceptible to damage from landslides or flooding. Additionally, as discussed in threshold XX(b) above, the proposed project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and would not expose project occupants to significant levels of pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The project would implement fire safety features outlined in the Fire Protection Plan (Appendix D; Dudek 2024), such as fuel modification zones and adequate evacuation routes. The project would not increase the risk of people and structures experiencing significant risks such as downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. **Impacts would be less than significant.**

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?

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

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated. Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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 were considered in the response to each question in sections IV, V, and VII of this form. In addition to project-specific impacts, this evaluation considered the project's potential for significant cumulative effects. Resources that have been evaluated as significant would be potentially impacted by the project, particularly cultural resources. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes Mitigation Measure CUL-1, which requires the implementation of an archaeological monitoring program. As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this project has been determined not to meet this Mandatory Finding of Significance. **Impacts would be less than significant with mitigation incorporated.**

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

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

Discussion/Explanation:

Less Than Significant Impact. No specific projects were identified in the project vicinity that could exacerbate or compound project impacts. However, per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects from hypothetical projects were considered in the response to each question in Sections I through XX of this form. In addition to project specific impacts, this evaluation considered the project's potential for

incremental effects that are cumulatively considerable. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance. **Impacts would be less than significant.**

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

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

Discussion/Explanation:

Less Than Significant with Mitigation Incorporated. In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VII. Geology and Soils, IX. Hazards and Hazardous Materials, X Hydrology and Water Quality XIII. Noise, XIV. Population and Housing, and XVII. Transportation. As a result of this evaluation, there were determined to be potentially significant effects to human beings related to noise. However, mitigation has been included that reduces these effects to a level below significance. This mitigation includes Mitigation Measures NOI-1, which requires a Construction Noise Management Plan. As a result of this evaluation, there is no substantial evidence that, after mitigation, there are adverse effects to human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance. **Impacts would be less than significant with mitigation incorporated.**

XXII. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State, and local regulation are available on the Internet. For Federal regulation refer to <http://www4.law.cornell.edu/uscode/>. For State regulation refer to <https://leginfo.legislature.ca.gov>. For County regulation refer to www.amlegal.com. All other references are available upon request.

Bay Area Air Quality Management District. 2022. California Environmental Quality Act Air Quality Guidelines, Appendix B: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans. April. Available at: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-b-thresholds-for-evaluating-significance-of-climate-impacts_final-pdf.pdf?rev=10305f45037b41dba2cd1b45b288d54b&sc_lang=en.

California Department of Conservation. 2017. Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region. https://www.conservation.ca.gov/cgs/documents/publications/special-reports/SR_240-MLC-WesternSanDiegoPCR-2017-Plate01-MRZs.pdf.

California Department of Transportation (Caltrans). 2020. Transportation and Construction Vibration Guidance Manual. April. <https://dot.ca.gov/programs/environmental-analysis/noise-vibration/guidance-manuals>.

CR Associates. 2023. Karve Ski Park, Vehicle Miles Traveled Analysis. October.

Excel Engineering. 2025a. Stormwater Quality Management Plan for Priority Development Projects. February.

2025b. Priority Project Hydrology Study. May.

HELIX Environmental Planning, Inc. (HELIX). 2025. Karve Ski Park Project Cultural Resources Survey Report. January.

2024a. Karve Ski Park Project Air Quality Technical Report. July.

2024b. Karve Ski Park Project Greenhouse Gas Emissions Technical Report. December.

2024c. Karve Ski Park Project Acoustical Analysis Report. November.

San Diego, County of (County). 2023. Multi-Jurisdictional Hazard Mitigation Plan. Available at: https://www.sandiegocounty.gov/content/sdc/oes/emergency_management/oes_jl_mitplan.html.

2011. General Plan Update Environmental Review. Available at: <https://www.sandiegocounty.gov/content/sdc/pds/gpupdate/environmental.html>. Accessed July 29, 2024.

South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Analysis Guidance Handbook. Available at: [https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)).

Valley Center Municipal Water District. 2021. 2020 Urban Water Management Plan. June.
Available at: <https://www.vcmwd.org/Portals/0/PDF/UWMP/UWMP.pdf>.