

Lake Jennings Campground & Public Access Recreation Amenity Improvements
Draft Initial Study/Mitigated Negative Declaration

Prepared for:

Helix WATER DISTRICT

7811 University Avenue, La Mesa, CA 91942

Prepared by:

BARANEK Consulting Group

9984 Scripps Ranch Boulevard, #138, San Diego, CA 92131

August 2025

CONTENTS

Section Page

1. Introduction 3
1.1 Environmental Checklist Form 3
1.2 Environmental Factors Potentially Affected 13
1.3 Determination 13

2. Evaluation of Environmental Impacts 14
2.1 Environmental Initial Study Checklist 15
I. Aesthetics 15
II. Agriculture and Forestry Resources 17
III. Air Quality 18
IV. Biological Resources 22
V. Cultural Resources 31
VI. Energy 36
VII. Geology and Soils 38
VIII. Greenhouse Gas Emissions 42
IX. Hazards and Hazardous Materials 43
X. Hydrology and Water Quality 46
XI. Land Use and Planning 51
XII. Mineral Resources 52
XIII. Noise 53
XIV. Population and Housing 55
XV. Public Services 56
XVI. Recreation 57
XVII. Transportation 58
XVIII. Tribal Cultural Resources 61
XIX. Utilities and Service Systems 62
XX. Wildfire 64
XXI. Mandatory Findings of Significance 66

3. References 68

4. Preparers 71

Appendices

A Air Quality Technical Study
B Biology Report
C Archaeological Survey
D CAP Consistency Checklist
E Hydrology Study
F Priority Development Project SWQMP
G Trip Generation and Vehicle Miles Traveled Screening Assessment

Figures

Figure 1 Regional Location 4
Figure 2 Aerial Photograph 5
Figure 3 Campground Improvements Plan 9
Figure 4 County Recreational Amenity 11

Tables

Table 1 Estimated Project Construction Emissions (Daily) 20
Table 2 Estimated project Construction Emissions (Annual) 20
Table 3 Estimated project Operational Emissions (Daily) 21
Table 4 Estimated project Operational Emissions (Annual) 21
Table 5 Vegetation Communities – Impacts and Mitigation 27

DRAFT MITIGATED NEGATIVE DECLARATION
LAKE JENNINGS CAMPGROUND & PUBLIC ACCESS RECREATION AMENITY IMPROVEMENTS PROJECT

An Environmental Initial Study Checklist or Initial Study (IS) was prepared for this project and is included with this Draft Mitigated Negative Declaration (MND). The information contained in the Environmental Initial Study Checklist will be used by the Helix Water District (HWD or District) to assess this project as required by the California Environmental Quality Act (CEQA) and state CEQA Guidelines, as well as related County Ordinances and Regulations.

An Initial Study (IS) is a document prepared by a lead agency to determine whether a project may have a significant effect on the environment. In accordance with California Code of Regulations Title 14 (Chapter 3, Section 15000 et seq.)—also known as the CEQA Guidelines—Section 15064 (a)(1) states that an environmental impact report (EIR) must be prepared if there is substantial evidence in light of the whole record that the proposed project under review may have a significant effect on the environment and should be further analyzed to determine mitigation measures or project alternatives that might avoid or reduce project impacts to less than significant levels. A negative declaration (ND) may be prepared instead if the lead agency finds that there is *no* substantial evidence in light of the whole record that the project may have a significant effect on the environment. An ND is a written statement describing the reasons why a proposed project, not otherwise exempt from CEQA, would not have a significant effect on the environment and, therefore, why it would not require the preparation of an EIR (CEQA Guidelines Section 15371). According to CEQA Guidelines Section 15070, a ND or *mitigated* ND (MND) shall be prepared for a project subject to CEQA when either:

1. The IS shows there is no substantial evidence, in light of the whole record before the agency, that the proposed project may have a significant effect on the environment; or
2. The IS identified potentially significant effects, but:
    a. Revisions in the project plans or proposals made by or agreed to by the applicant before the proposed MND and IS is released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur is prepared; and
    b. There is no substantial evidence, in light of the whole record before the agency, that the proposed project, as revised, may have a significant effect on the environment.

This MND assesses the environmental effects of the proposed Lake Jennings Campground & Public Access Recreation Amenity Improvements (project) located at 10108 Bass Road, Lakeside, CA 92040. The project sites are located along the shoreline of Lake Jennings situated in unincorporated Lakeside along Harritt Road. The project proposes to demolish a number of existing site elements, renovate existing campsites and facilities, construct new camp sites, upgrade and expand the stormwater drainage system infrastructure and utility connections, install new landscaping, upgrade existing support structures, resurface the primary access road, and construct new recreational amenities to be used by campers and the community.

As mandated by state CEQA Guidelines Section 15105, affected public agencies and the interested public may submit comments on the Draft IS/MND in writing before the end of the 30-day public review period starting **August 22, 2025**, and ending on **September 22, 2025**. Written comments on the Draft IS/MND should be submitted to the following address by 5 p.m., on **September 22, 2025**.

Helix Water District
7811 University Avenue
La Mesa, CA 91942
Contact: Debbie Lundy, Senior Right-of-Way Agent/Environmental Analyst
Telephone: 619.667.6268
Email: Debbie.lundy@helixwater.org

All comments received will be considered with the Final MND in determining whether to approve the Project. A printed copy of this document and associated plans and/or documents are available for review during normal operation hours for the duration of the public review period at the HWD office shown above, and also available on the District's website at https://www.hwd.com/268/CEQA-Notices.

1. INTRODUCTION

1.1 Environmental Checklist Form

1.	**Project Title:**	Lake Jennings Campground & Public Access Recreation Amenity Improvements Project
2.	**Lead Agency Name and Address:**	Helix Water District 7811 University Avenue La Mesa, CA 91942
3.	**Contact Person and Phone Number:**	Debbie Lundy, (619) 667-6268
4.	**Project Location:**	10108 Bass Road, Lakeside, CA 92040
5.	**General Plan Designation:**	Public Agency Lands (County General Plan)
6.	**Zoning:**	Open Space

7. Description of Project:

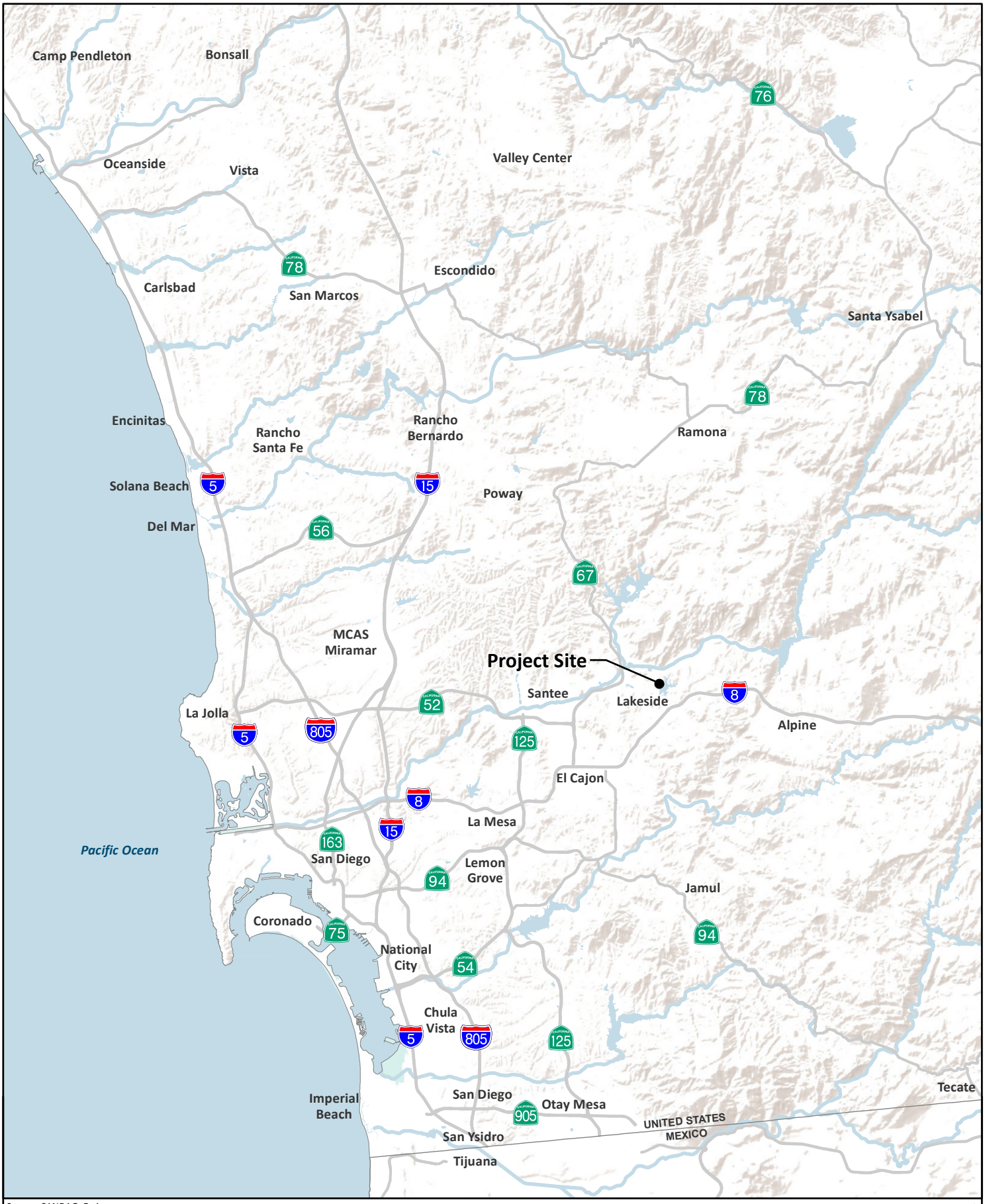
Project Location and Purpose

The project site is located in eastern San Diego County, within unincorporated Lakeside, which is approximately 18 miles northeast of downtown San Diego (**Figure 1**, *Regional Location*). The 85-acre reservoir is located along Harritt Road, approximately 0.60 miles north of Interstate 8 (I-8). The Lake Jennings Campground & Public Access Recreation Amenity Improvements Project (project) is situated on two, non-contiguous sites along the lake's shoreline, as shown in **Figure 2**, *Aerial Photograph*. The approximately 22.7-acre project is proposed at the existing Lake Jennings campground and at a nearby surface parking lot. Both project sites are accessible from Bass Road/Bass Drive, the internal access road that parallels the lake's southern shoreline and connects with Harritt Road. Helix Water District (HWD) operates the lake and the nearby water treatment and filtration facilities using the reservoir for storage and recreation. The District facilities at Lake Jennings produce potable water which is delivered to cities and communities within its service area. As a recreational facility, Lake Jennings offers fishing, camping, hiking, and picnicking activities.

The project is proposed to renovate and expand the existing campground facilities at Lake Jennings, adding new campsites and recreational amenities.

Existing Facilities and Operations

The 18-acre, 97-space Lake Jennings campground located in the northwestern corner of Lake Jennings (APN 395-140-01) features both recreational vehicle (RV) spots and tent sites, as well as recreational amenities. The campground contains 35 full-hookup RV sites (water, electricity and sewer), 17 partial-hookup RV sites (electricity and water), 44 non-hookup sites for RVs or tents, and a group camp site which accommodates up to five tents. Existing amenities at the campground include three restroom buildings, an enclosed pavilion and covered playground, an outdoor lounge area, several outdoor game areas (e.g., ladder golf and horseshoe pits) and a semi-enclosed gazebo at the group camp site. Hiking trails exist throughout the campground, creating internal connections and linking the campground facilities to the nearby shoreline and other hiking trails in the project vicinity. An existing office building close to the campground entry point serves as an office for the campground staff.



Source: SANDAG, Esri

Figure 1

Regional Location

LAKE JENNINGS CAMPGROUND &
PUBLIC ACCESS RECREATION AMENITY IMPROVEMENTS

BARANEK Consulting Group

N

0 6 Miles



Aerial Photo: Nearmap 2024

BARANEK Consulting Group

N 0 320 Feet

Figure 2

Aerial Photograph

LAKE JENNINGS CAMPGROUND &
PUBLIC ACCESS RECREATION AMENITY IMPROVEMENTS

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The Lake Jennings campground operates year-round. The lake is open for fishing and boating every weekend Friday through Sunday and on holiday Mondays. Shoreline fishing is available from the campground daily. As a drinking water reservoir, swimming is prohibited by the County Health Department. Leashed pets are allowed at the campground but are not permitted by the water or on the lake loop trail. Campfires are only permitted within designated fire rings.

The 0.90-acre County recreational amenity site south of the campground is currently operated as a paved parking area along the southwestern shoreline of the lake (APN 395-152-10). In the vicinity of the project site, Bass Drive links the County recreational amenity site to the campground and crosses Chet Harritt Dam. A gated road connection between Bass Drive/Road and Lake Jennings Park Road is also located near the parking lot.

Campground Improvements

The campground portion of the project consists of a whole campground site redevelopment, including enhancements to existing facilities, as well as the installation of new campground sites and new recreational amenities. Proposed campground improvements include demolition of various site elements, such as camp sites, utility infrastructure, asphalt roads, curbs, concrete paving, retaining walls, fencing, lighting, railings, campsite markers, existing site furnishings, and existing vegetation. Existing campground sites would be improved with new utility hookups (i.e., electrical, water, sewer infrastructure), and site furnishings, and new campsites would be constructed to feature utility hookups, permeable paver plaza spaces, site furnishings, campsite markers, and campfire rings. In addition, four new cabin sites would be sited in the campground using prefabricated cabin units with associated access stair and ramp assemblies, ADA accessible walkways and concrete paver patios, site furnishings, fire rings, and campsite markers. A gravel turnaround and parking area would be installed near the cabins. Ultimately, the redeveloped campground would contain 107 sites, including 92 RV sites, 11 tent sites and four cabins (**Figure 3**, *Campground Improvement Plan*).

Several existing buildings at the campground would be renovated by the project, including the restrooms, office building garage and laundry room. The various building renovations would upgrade the existing fixtures/facilities, install ADA accessibility improvements, provide fresh paint and install new windows, where applicable. New recreational amenities would be added to the campground, including a splash pad/pool (water play) area featuring a concrete plaza and artificial turf space; a dog park surrounded by chain link fencing with an entry vestibule; and a multi-purpose pavilion area containing shade structures, barbeque facilities, picnic tables, fire ring and site furnishings .

Throughout the campground, new concrete and decomposed granite (DG) walkways and plaza areas with lighting at major road intersections and community use areas and buildings would be constructed. Keystone retaining walls would be installed along slopes, where necessary, to minimize grading. Chain link fencing, wood privacy fencing and lodgepole fencing would be placed throughout the site. Wi-fi antenna poles and wiring would be installed to provide wireless service. Wood and chain safety bollard assemblies would be installed to control access. Permanent below-grade irrigation systems would be installed in all new landscape areas. Stormwater drainage systems and infrastructure would be installed to capture and treat runoff from impervious services before discharge into the reservoir. New landscaping, consisting of trees, shrubs, groundcovers and hydroseed would be placed throughout the site, including adjacent to areas near the campsites. The project would also involve the spot repairs and resurfacing of Bass Road from its westernmost intersection with Harritt Road to the campground within its existing alignment. Minor utility

improvements to the sewer line that crosses the road are also a part of the project. Paved parking spaces and the resurfaced road would be restriped as part of the site improvements.

County Recreational Amenity

The County recreational amenity portion of the project would redevelop the existing paved parking lot with a playground featuring play equipment and wood fiber surfacing and a fenced dog park with a concrete walkway access. A DG-surface parking lot with an ADA parking stall and accessible walkway would be placed between the two amenities and a new concrete driveway connection to Bass Drive would be constructed. Bench seating, site furnishings, concrete and DG access trails and lodgepole fencing would be installed across the site. A biofiltration basin would be placed on site to collect runoff from the dog park and a new water line and backflow preventer would be installed to service two drinking fountains. **Figure 4**, *County Recreational Amenity*, illustrates the arrangement of uses on the site. The County recreational amenity would be open to lake users as well as the general public.

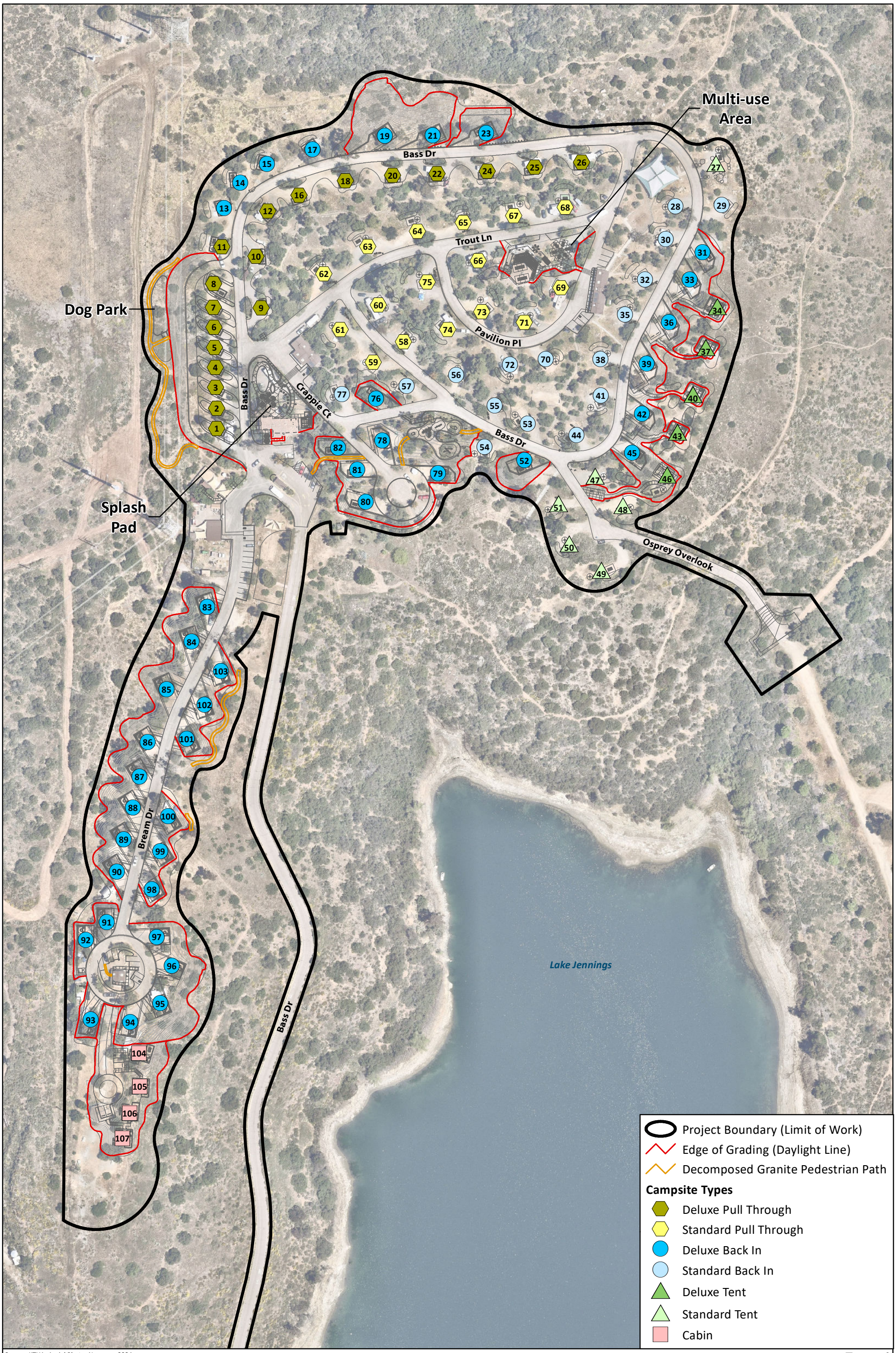
Project Construction

Project construction is anticipated to begin in June 2026 with site preparation. Construction of the project is expected to occur over a period of 12 months and is anticipated to be completed around summer 2027. Construction activities would occur on approximately 10.38 acres of the campground and the County recreational amenity site and would include demolition, grading, paving and landscaping. Grading would primarily consist of the importation of soil for fill and minor cuts. Grading quantities are estimated at approximately 16,000 cubic yards (cy) of import combined with approximately 3,800 cy of cut, resulting in approximately 19,800 cy of fill placement across both project site locations. Grading quantities would ultimately be determined during final engineering. No soil export is anticipated.

Construction equipment expected to be utilized during demolition and construction would be typical of similar construction activities and may include equipment such as a backhoe, front-loader, excavator, concrete breaker, dump trucks, equipment trucks, air compressors, hydraulic pumps, concrete boom pump trucks, concrete delivery trucks, and paving trucks. Generally, construction would occur between the hours of 8 a.m. and 5 p.m., Monday through Friday, excluding holidays.

8. Surrounding Land Uses and Setting *(briefly describe the project's surroundings)*:

The project is located along the shoreline of Lake Jennings in the northeastern portion of the unincorporated community of Lakeside within San Diego County (County); refer to Figure 2. Blossom Valley is a distinct neighborhood adjacent to Lake Jennings and I-8. The area is dominated by low density residential uses on lots primarily ranging from 2 to 4 acres. There are also some interspersed agricultural uses on larger lots, ranging from 4 to 20 acres. The lands surrounding the project area are primarily undeveloped. The open space and public parklands associated with Lake Jennings are surrounded by undeveloped lands. North and east of the campground is open park land and undeveloped land, followed by rural residential properties. The area surrounding the County recreational amenity site features the RM Levy Water Treatment Plant (WTP) and a residential mobile home community. A short section of paved road connects Bass Road and Lake Jennings Park Road, linking the reservoir property to the WTP west of the County recreational amenity site. The surface elevation of the lake resides at 700 feet above mean sea level (MSL). The high point of the campground project area is on the ridge that extends south from the main campground at 841 feet above MSL, and the low point is at 711 feet above MSL at the



Source: KTUA; Aerial Photo: Nearmap 2024

BARANEK Consulting Group

N 0 150 Feet

Figure 3

Campground Improvements Plan

LAKE JENNINGS CAMPGROUND & PUBLIC ACCESS RECREATION AMENITY IMPROVEMENTS

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Aerial Photo: Nearmap 2024

BARANEK Consulting Group

N

0 60 Feet

Figure 4

County Recreational Amenity

LAKE JENNINGS CAMPGROUND &
PUBLIC ACCESS RECREATION AMENITY IMPROVEMENTS

playground/dog park improvement area south of the dam. The steep hillsides surrounding the project site can reach up to 60 percent slope.

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

The project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction of Land Disturbance Activities (State Water Resources Control Board [SWRCB] Order No. 2009-0009-DWQ, NPDES No. CA2000002; Construction General Permit).

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

In accordance with the requirements of Assembly Bill (AB) 52, codified by Public Resources Code Section 21080.3.1 et seq., the District sent notification to Native American Tribes traditionally and culturally affiliated with the project area on April 4, 2025. See Section XVIII of the Initial Study Environmental Checklist for more detail on the responses that were received from local tribal representatives. Also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

1.2 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact", as indicated by the checklist on the following pages. It is concluded that the project would result in the following potentially significant adverse environmental impacts to the following resource areas:

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

1.3 Determination

On the basis of this initial evaluation *(select one)*:

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

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

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

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

☐ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Mitigated Negative Declaration pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR or Mitigated Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Nothing further is required.

This Initial Study Environmental Checklist was prepared by:

Debbie Lundy	*Senior Right of Way Agent/Environmental Analyst*
Name	Title
Debbie Lundy	08/18/2025
Signature	Date

2. EVALUATION OF ENVIRONMENTAL IMPACTS

Each of the responses in the following environmental checklist considers the whole action involved, including project-level, cumulative, on-site, off-site, indirect, construction, and operational impacts. A brief explanation is provided for all answers and supported by the information sources cited:

1. 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 would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. A “Less-than-Significant Impact” applies when the project would not result in a substantial and adverse change in the environment. This impact level does not require mitigation measures.
3. A “Less-than-Significant Impact 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 (mitigation measures from Section 2 below, "Earlier Analyses," may be cross-referenced). Measures incorporated as part of the Project Description that reduce impacts to a “Less than Significant” level shall be considered mitigation.
4. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect is significant. If there are one or more “Potentially Significant” entries when the determination is made, an EIR is required.

Lead agencies are encouraged to incorporate references to information sources for potential impacts into the checklist (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.

Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

The explanation of each issue should identify the significance of criteria or threshold, if any, used to evaluate each question, as well as the mitigation measure identified, if any, to reduce the impact to less than significant.

2.1 Environmental Initial Study Checklist

I. Aesthetics

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
I.	AESTHETICS. Except as provided in Public Resources Code section 21099, would the Project:				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	Substantially degrade the existing visual character or quality of public views of the site and its surroundings?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare that would adversely affect day or nighttime views of the area?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) The project site is located within the Lakeside Community Planning Area (CPA) of San Diego County. According to the San Diego County General Plan Update Final Environmental Impact Report (General Plan Update Final EIR; County of San Diego 2011), scenic vistas and visual resources within the County include Resource Conservation Areas, which are areas designated by the County for a variety of reasons, including areas of aesthetic quality. Within the Lakeside CPA, El Cajon Mountain/El Capitan Reservoir is the only area designated as a Resource Conservation Area for visual resources. The rocky peaks, especially on El Cajon Mountain, serve as a scenic backdrop for the El Cajon and Lakeside regions. El Cajon Mountain and El Capitan Reservoir are approximately 5 miles to the northeast of the project site. The proposed campground site redevelopment would occur at an existing campground. Due to the nature of the proposed improvements and the distance between the project site and the El Cajon Mountain/El Capitan Reservoir, the project would not adversely impact views from scenic vistas, and **no impact** would occur.

b) The nearest officially designated State Scenic Highways include a portion of State Route 52, located approximately 8 miles west of the project, and a portion of SR-125, located approximately 8 miles southwest of the project site (California Department of Transportation 2025). Interstate 8, located approximately 0.8 miles south of the County recreational amenity site, is an eligible State Scenic Highway, but is not officially designated. The project site is not visible from Interstate 8, nor is it visible from any designated State Scenic Highway. The project site consists of an existing campground and a surface parking lot. The proposed improvements would not substantially damage scenic resources within a State Scenic

Highway. Therefore, the project would have **no impact** to scenic resources within a state scenic highway.

c) The project consists of site redevelopment of an existing campground and nearby parking lot. The proposed improvements would increase the number of campsites and augment the existing recreational amenities available at the campground and near the lakeshore. Temporary visual changes would occur during project construction. Following construction, the campground would have an increased number of sites, new recreational amenities and updated landscaping. Additionally, the amenity site project would be visually changed, converting a surface parking lot to a playground, dog park, and a smaller surface parking lot with landscape treatments. Visual changes would occur at the project site, but the redeveloped recreational sites would be consistent with the aesthetics of the existing recreational uses of the site and the surrounding area. Therefore, the project would not substantially degrade the existing visual character or quality of the project site, and a **less-than-significant** impact would occur.

d) The campground contains minor amounts of lighting, including exterior building lighting. The project would result in demolition of various site elements, including lighting. Campground redevelopment would include placement of new exterior lighting at major road intersections, community use areas, and buildings (i.e., restrooms, office building, garage, laundry rooms, and new cabins). Construction of the project would occur during the day when no lighting would be needed. The use of lighting at the campground would not create substantial new sources of night lighting or glare from light sources. Any temporary lighting or new permanent lighting would be required to be shielded and oriented downward to minimize light spill. Therefore, the project would result in a **less-than-significant** impact associated with substantial new sources of light and glare.

SOURCES: California State Scenic Highway System Map (California Department of Transportation 2025); General Plan Update Final Environmental Impact Report (County of San Diego 2011).

II. Agriculture and Forestry Resources

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
II.	AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in Forest protocols adopted by the California Air Resource Board. Would the Project:				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forestland or conversion of forestland to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forestland to non-forest use?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a) According to the Farmland Mapping and Monitoring Program of the California Department of Conservation (2025), the campground site is mostly designated as "Urban Built-Up Land", but some portions are designated as "Non-Agricultural or Natural Vegetation." Additionally, the amenity site is designated as "Other Land." No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance occurs on or near the project area. No active agricultural operations currently exist on-site or in the vicinity of the project site. The project area is utilized as a campground and a parking lot. The project would not convert agricultural land to a non-agricultural use. **No impact** would occur.

b–c) The project site is zoned Open Space (S80) and is not zoned for agricultural use. The project site is not located within a Williamson Act Agricultural Preserve. **No impact** would occur.

d) The project site does not contain any forest or timberland as defined by Public Resource Code Section 4526 or Government Code Section 51104(g). **No impact** would occur.

e) The project site does not contain any forest or timberland as defined by Public Resource Code section 4526 or Government Code Section 51104(g). Therefore, the project would not result in the loss of forest land or conversion of forest land to non-forest use. **No impact** would occur.

f) The project would construct campground improvements at an existing campground. There are no agricultural uses or forest land uses on-site or in the vicinity of the project. Therefore, the project would not result in the significant conversion of farmland or forest land to a non-agriculture use. **No impact** would occur.

SOURCES: Farmland Mapping and Monitoring Program (California Department of Conservation 2025); Farmland; County of San Diego PDS – Zoning and Property Information (County of San Diego 2025). San Diego Country General Plan Update Final Environmental Impact Report (County of San Diego 2011).

III. Air Quality

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

Project Impacts and Mitigation Measures

a) The project site is located within the San Diego Air Basin (Basin). The California Air Resources Board coordinates and oversees both State and federal air pollution control programs in

California. The California State Implementation Plan (SIP) is the document that sets forth the State's strategies for attaining the National Ambient Air Quality Standards. The San Diego Air Pollution Control District (SDAPCD) is the agency responsible for preparing and implementing the portion of the California SIP applicable to the Basin. The SDAPCD has adopted air quality plans to improve air quality, protect public health, and protect the climate. The San Diego Regional Air Quality Strategy (RAQS) outlines SDAPCD's plans and control measures designed to attain and maintain the state standards, while San Diego's portions of the SIP are designed to attain and maintain federal standards. The RAQS are based on the growth projections of the San Diego Association of Governments (SANDAG) and land use plans developed by the cities and by the County. As such, projects that propose growth consistent with County's General Plan and the County's land use plans, and thus consistent with the growth anticipated by SANDAG, would be consistent with the RAQS and SIP.

The project site is designated for Public Agency Lands use in the County's General Plan. The proposed project is renovation and the addition of recreational amenities at an existing campground and recreation lake which would not conflict with zoning or be inconsistent with the anticipated use in the General Plan. Therefore, the project is consistent with its General Plan designation and would not change the General Plan growth assumptions in the RAQS and SIP. The project would not conflict with or obstruct implementation of the applicable air quality plan. **No impact** is identified.

b) Both the State and the Federal governments have established health-based ambient air quality standards for seven air pollutants. These pollutants include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter smaller than or equal to 10 microns in diameter (PM_{10}), particulate matter smaller than or equal to 2.5 microns in diameter ($PM_{2.5}$), and lead. In addition, California maintains ambient air quality standards for sulfates, hydrogen sulfide (H_2S), vinyl chloride, and visibility-reducing particles. These standards are designed to protect public health and welfare.

Project implementation would produce short-term, temporary pollutant emissions during construction and during long-term operations. Temporary emissions would be generated by vehicles transporting construction workers to and from the site, and diesel-powered equipment used for site preparation, grading, and paving phases of construction. Additionally, grading would disturb surface soils and cause a discharge of dust particulates into the air. Exhaust emissions from construction activities would vary daily as construction activity levels and types of change. Standard dust control during clearing and grading operations, including watering, surfactants, shrouding, limited vehicle speeds, surfacing haul roads and other technological measures, would be required in accordance with the SDAPCD Rule 55 and the regulations of the County Grading Ordinance to reduce construction-related particulate emissions. Construction dust control measures would be included on all project construction contracts, grading permits, improvement plans, and final maps. The project's construction emissions would be intermittent and temporary, short-term in nature as they would cease upon project operation. As shown in **Table 1**, *Estimated Project Construction Emissions (Daily)*, and **Table 2**, *Estimated Project Construction Emissions (Annual)*, project construction would not result in exceedances of SDAPCD's daily or annual emissions thresholds, and **less-than-significant** impacts would occur.

TABLE 1
ESTIMATED PROJECT CONSTRUCTION EMISSIONS (DAILY)

	Maximum Peak Daily Emissions (lb/day)					
	VOC	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
2026 Peak Day Construction Emissions	3.52	47.3	36.5	0.14	13.1	6.32
2027 Peak Day Construction Emissions	2.92	9.39	12.9	0.02	0.42	0.31
Significance Threshold	**75**	**250**	**550**	**250**	**100**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

SOURCE: Bluescape Environmental 2025

TABLE 2
ESTIMATED PROJECT CONSTRUCTION EMISSIONS (ANNUAL)

	Maximum Annual Emissions (tons/yr)					
	VOC	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
2026 Construction Emissions	0.13	1.26	1.33	<0.005	0.19	0.09
2027 Construction Emissions	0.08	0.44	0.61	<0.005	0.02	0.01
Significance Threshold	**13.7**	**40**	**100**	**40**	**15**	**10**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

SOURCE: Bluescape Environmental 2025

Operational air pollutant emissions would be primarily associated with mobile sources produced by any new campground and park users at Lake Jennings. Limited energy source emissions would be produced by the power required to run the new irrigation system. In addition, the provision of 10 new fire rings, barbeque facilities (BBQ) and emergency generator unit would provide new sources of operational emissions. The project's operational pollutant emissions would be minor and incremental given the minor increase in the number of campsites and the new recreational amenities. Expected daily and annual operational emissions are identified in **Table 3**, *Estimated Project Operational Emissions (Daily)*, and **Table 4**, *Estimated Project Operational Emissions (Annual)*. As shown in Table 3 and Table 4, the project would not generate daily or annual emissions in excess of thresholds. As such, long-term operational emissions associated with the project would not result in a cumulatively considerable net increase of any criteria pollutant and would be **less than significant**.

TABLE 3
ESTIMATED PROJECT OPERATIONAL EMISSIONS (DAILY)

	Maximum Peak Daily Emissions (lb/day)					
	VOC	**NOx**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Operational Emissions	55.4	1.16	62.9	0.10	8.75	8.43
BBQ Emissions	<0.005	0.04	0.02	<0.005	<0.005	<0.005
Total Emissions	***55.4***	***1.20***	***62.9***	***0.10***	***8.75***	***8.43***
Significance Threshold	**75**	**250**	**550**	**250**	**100**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

SOURCE: Bluescape Environmental 2025

TABLE 4
ESTIMATED PROJECT OPERATIONAL EMISSIONS (ANNUAL)

	Annual Emissions (tons/yr)					
	VOC	**NOx**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Operational Emissions	6.92	0.12	7.90	0.013	1.12	1.06
BBQ Emissions	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Total Emissions	***6.92***	***0.12***	***7.90***	***0.013***	***1.12***	***1.06***
Significance Threshold	**13.7**	**40**	**100**	**40**	**15**	**10**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

SOURCE: Bluescape Environmental 2025

c) Sensitive receptors include schools, hospitals, resident care facilities, day care centers, or other facilities that may house concentrations of individuals with health conditions that would be adversely impacted by changes in air quality. None of these types of sensitive receptors occur in or within 0.25 miles of the project area.

During project construction, toxic air contaminants (TACs) would be temporarily produced due to diesel particulate matter associated with heavy construction equipment usage. The SDAPCD Health Risk Assessment protocol recommends that sensitive receptors located within 0.25 miles of a proposed use that emits TACs be considered in an evaluation of TAC-related health impacts. Sensitive receptors located beyond the 0.25-mile distance are generally not required to be evaluated due to atmospheric mixing and dispersion of pollutants. No operational TACs would be produced by the project because of its recreational nature that could lead to unhealthful emissions. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and **less-than-significant** impacts would occur.

d) Construction phase odors would be produced as a result of using diesel-power equipment, primarily from equipment exhaust. However, all construction activity would be temporary in nature and would cease to be produced once construction is complete. No other sources of

objectionable odors would occur from construction or operation of the project. **Less-than-significant** impacts would occur.

SOURCES: SDAPCD Rules and Regulations (San Diego Air Pollution Control District 2020); San Diego Regional Air Quality Strategy (RAQS; San Diego Air Pollution Control District 2022); County of San Diego Grading Ordinance (County of San Diego 2003); Air Quality Technical Study Results for Lake Jennings Campground Improvement Project (Bluescape Environmental 2025).

IV. Biological Resources

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
IV.	BIOLOGICAL RESOURCES. Would the Project:				
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nesting sites?	☐	☒	☐	☐
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

Project Impacts and Mitigation Measures

a) **Direct Impacts.** No federally or state listed as endangered or threatened animals were detected on the project site or in the immediate vicinity during biological surveys conducted in 2021 and 2025 (Tierra Data 2025). The project would impact 0.42 acres of coastal sage scrub habitat that has the potential for the federally listed as threatened coastal California gnatcatcher. The project would also impact habitat that supports the sensitive coastal cactus wren, which are protected under California Fish and Game Code (CFG Code) as a sensitive species of concern and a native bird. Up to 0.13 acres of cactus wren-occupied cactus would be impacted by the project, affecting approximately 3 percent of the total occupied habitat in the project area, and 0.09 acres of unoccupied, but adjacent to, occupied maritime succulent scrub. Direct impacts to the coastal cactus wren may occur if clearing and grading occur in occupied habitat during the nesting season (February 15 to August 15). Non-listed sensitive animal species which have a moderate or high potential to occur within or immediately adjacent to the project area include Cooper's hawk, rufous-crowned sparrow, orange-throated whiptail, red diamond rattlesnake, western mastiff bat, and western yellow bat. Cooper's hawk, rufous-crowned sparrow, and orange-throated whiptails are watch-list species. If any red diamond rattlesnakes, western mastiff bats, or western yellow bats occur in the impacted area, direct impacts would be significant unless mitigated. All actively nesting birds and their nests, with a few exceptions, are protected under the Migratory Bird Treaty Act (MBTA) and CFG Code. Direct impacts may occur to birds nesting in the vegetation on site if clearing occurs during the bird breeding season (January 1 through September 15). Impacts to nesting birds would be a violation of the MBTA and CFG Code and would be significant unless avoided. Crotch's bumble bee, a candidate species for listing under the California Endangered Species Act (CEQA) has a low potential to occur within the campground or immediate periphery where the project occurs (which is already developed or frequented by campers and their dogs). Although the potential for Crotch's bumble bee is considered low and no impacts are expected, the presence of scrub habitat and appropriate nectar sources within habitat adjacent to the project site could result in potentially significant impacts, if the species is listed under the CESA before project construction is initiated.

No federally or state listed as endangered or threatened plant species were documented on the project site. As such, no significant impacts on federally or state-listed endangered or threatened plant species are anticipated with project implementation. One California Rare Plant Rank (CRPR) list 4B.3 species, San Diego County viguiera, was detected on the project site and would be impacted by the project. This species is present on site within the maritime succulent scrub, a sensitive habitat of which it is a component (refer to Item IV.b below for a discussion of impacts to maritime succulent scrub). No other sensitive plant species are expected at the project site, as rare plant surveys were performed at suitable times of the year and no additional species were detected. Impacts to San Diego County viguiera would be potentially significant and would be mitigated to below a level of significance through implementation of mitigation for impacts to maritime succulent scrub (discussed in Item IV.b).

To avoid significant, direct impacts on special-status resources, including nesting birds **Mitigation Measures BIO-1** through **BIO-4** shall be implemented, which would reduce direct impacts to **less than significant with mitigation incorporated**.

Indirect Impacts. Indirect impacts to sensitive animal species noted above can occur from errant grading, construction or operational noise, changes in drainage patterns after grading that modify habitats, degraded surface water quality from runoff during construction, lighting onto habitat areas, introduction of invasive plant species, and brush management that leads to habitat degradation.

Impacts beyond the limits of work can occur for numerous inadvertent reasons and could potentially impact sensitive habitat and plants outside the proposed project footprint. Errant grading beyond the limits of work may impact sensitive habitat, resulting in a potentially significant impact, requiring mitigation.

Noise from machinery during grubbing, earthwork, and construction activities would be a temporary impact to local wildlife. When construction noise exceeds 60 dBA L_{eq}, noise-related impacts would be considered potentially significant if listed species, including cactus wren, raptors and sensitive bird species that are breeding in the habitats in and around the project site could be displaced and/or fail to breed. Other sensitive species observed on site, such as the orange-throated whiptail, are not sensitive to construction noise. Noise impacts to listed bird species, including the cactus wren, raptors, and other sensitive bird species would be considered potentially significant, requiring mitigation.

Stormwater drainage requirements ensure the amount of water leaving a site is not changed by installation of a project. Most newly graded and hardscape areas have been designed to drain to the existing Lake Jennings reservoir via sheet flow or the storm drain system. Compliance with stormwater regulations would ensure no impacts to adjacent sensitive habitats would occur from uncontrolled drainage.

Surface water can be contaminated by sediment during grubbing, grading, and construction, from fuels, oils, and lubricants from construction vehicles, and post-construction by run off from rooftops, hardscaping and landscaping. Decreased water quality may adversely affect native vegetation, aquatic animals, and terrestrial wildlife that depend upon these resources. Best Management Practices (BMPs) as stipulated in the project Stormwater Pollution Prevention Plan (SWPPP) would be used to control erosion, sedimentation, and pollution that could impact surface water quality during construction. Post-construction runoff from landscaping and hardscaping would flow into the Lake Jennings reservoir, where it would be treated at the water filtration plant and prevent runoff of pollutants into surrounding areas. Based on compliance with a SWPPP and all stormwater regulations and applications, the project's effects on surface water quality would be less than significant.

Exterior night lighting has the potential to illuminate native habitats off site, which could interfere with wildlife movement and could unbalance predator/prey relationships and provide nocturnal predators with an added advantage over their prey. This could adversely affect native wildlife, especially if listed species would be affected. Any outdoor lighting around the buildings and in the parking lots would be shielded to prevent light from illuminating habitat around the proposed project where required by lighting overspill using fixtures that physically direct light away from the outer edges of the property or fences, or other barriers on the edge of development to prevent light overspill. Final building plans for the campground improvements would identify the shielded light fixtures and/or fencing/barriers, in accordance with County outdoor lighting regulations.

In summary, potentially significant indirect impacts to special-status species may occur from errant grading, construction noise, and outdoor lighting, resulting in a significant impact. Implementation of **Mitigation Measure BIO-1** would reduce the impact to a less-than-significant level. Therefore, impacts would be **less than significant with mitigation incorporated**.

b) The project site contains 3.84 acres of maritime succulent scrub, 12.41 acres of coastal sage scrub, 0.26 acres of disturbed coastal sage scrub, 2.04 acres of non-native grassland, 0.60 acres of eucalyptus woodland, 1.44 acres of disturbed habitat, and 24.40 acres of developed areas. The project would result in impacts to 0.22 acres of maritime succulent scrub and 0.42 acres of coastal sage scrub, both of which are considered sensitive communities. The project would also impact 9.29 acres of developed land, 0.35 acres of disturbed habitat, and 0.01 acre of eucalyptus woodland. None of these three communities are considered sensitive. Impacts to coastal sage scrub and non-native grassland are not considered significant as they would occur in existing fire clearance zones and be subject to mowing or thinning as part of on-going operations. In addition, the coastal sage scrub shrub east of the new dog park at the County recreational amenity site have grown through or over an existing chain link fence and any trimming back to the fence as part of the project would not be considered a significant impact. Direct impacts to maritime succulent scrub and coastal sage scrub from site grading would be significant. Implementation of **Mitigation Measure BIO-2** would be required to reduce impacts to a less than significant level. Therefore, impacts related to sensitive vegetation communities would be **less than significant with mitigation incorporated**.

c) Lake Jennings is a jurisdictional water, but the edge of the lake is distinct, and no other potential waters of the United States of the State occur within the project area. The project limits do not extend to Lake Jennings. **No impact** to jurisdictional waters would occur.

d) The Lake Jennings area is bordered by development on three sides. The El Monte Valley immediately to the north of Lake Jennings is a major corridor that connects El Capitan Reservoir and the mountains to the east with San Vicente Reservoir and Iron Mountain to the north and the San Diego River Valley to the west. Development of the project would not have any effect on this important corridor.

Lake Jennings is part of a significant spur of native habitat south of the El Monte Valley of the San Diego River habitat corridor. The lake is an important foraging and wintering area for water birds. It is also the largest component of the Lake Jennings genetic group of coastal cactus wren, which is a centrally located population connecting the Sweetwater/Encanto and Otay populations with those to the north. Of the five territories of coastal cactus wren close to the campground, three of the territories occur partly within the project site and cactus would be impacted by the proposed project. For all three of these territories, a relatively small amount of the cacti in the territory (i.e., less than 3 percent or 0.13 acres) would be impacted, but the impacts would approach or cover areas with known nests in 2025. Impacts to cacti would be mitigated through implementation of **Mitigation Measure BIO-1** and **BIO--2**. Therefore, impacts would be **less than significant with mitigation incorporated**.

e) The Helix Water District has adopted local guidelines for implementing CEQA, which have been complied with as part of the project's CEQA process. Beyond the local CEQA guidelines, Helix Water District does not have specific policies that protect biological resources. The project site is not subject to local regulations or ordinances protecting biological resources; however, compliance with the standards of the County's MSCP Subarea Plan is proposed, as discussed under Item IV.f. The project would not conflict with polices or ordinances protecting biological resources. **No impact** would occur.

f) The project sites are not included in any local Habitat Conservation Plans or Natural Community Conservation Plans. With mitigation for impacts to habitats and covered sensitive species (**Mitigation Measures BIO-1** through **BIO-4**) to County MSCP Subarea Plan standards, the project would be in compliance with the County MSCP Subarea Plan and would not conflict with the provisions of the MSCP. As such, the project would not conflict with any local, regional, or state habitat conservation plans. Impacts would be l**ess than significant with mitigation incorporated**.

Mitigation Measures

BIO-1: **Sensitive Species.** To avoid significant impacts to special-status species and inadvertent disturbance to areas outside the limits of the proposed project activities, the following monitoring requirements and BMPs shall be implemented under the oversight of a qualified biologist:

Cactus Wren

1. Direct removal of prickly pear cactus identified as occupied nesting habitat for the coastal cactus wren shall be avoided between February 15 through August 15.
2. All impacts to occupied cactus wren habitat shall be avoided, to the maximum extent possible, during implementation.
3. Direct impacts to cactus wren shall be mitigated through either:
    a. The salvage and propagation of prickly pear cactus and establishment of a 0.66-acre area of prickly pear cactus mitigation area on the west side of Lake Jennings Campground shall be implemented to offset project impacts to 0.22 acres of occupied prickly pear cactus contained in maritime succulent scrub (i.e., 3:1 ratio). A Mitigation Plan (Plan) shall be prepared by the Helix Water District and approved by California Department of Fish and Wildlife (CDFW) prior to the initiation of cactus salvage and propagation. The Mitigation Plan shall identify the mitigation location; site preparation; installation procedures; species to be planted; maintenance, monitoring and reporting requirements; protection mechanisms, and responsible parties, in compliance with Item 3.d.

    or

    b. Recordation of a Conservation Easement over at least 0.66 acres (to mitigate for impacts to 0.22 acres of maritime succulent scrub) of cactus wren-occupied and adjacent maritime succulent scrub habitat (**Table 5**, *Vegetation Communities – Impacts and Mitigation*). Cactus wren-occupation has been identified on a portion (approximately 1.9 acres) of an 8.85-acre parcel

(Assessor's Parcel Number 395-130-38-00), which is nearby and owned by the Helix Water District. The Helix Water District shall utilize cactus-wren occupied habitat within the recorded Conservation Easement. The Conservation Easement shall be recorded 30 days prior to initiating project impacts to cactus wren occupied habitat (i.e., maritime succulent scrub).

TABLE 5
VEGETATION COMMUNITIES – IMPACTS AND MITIGATION

Vegetation Community (Holland Code)	Totals	Impacts	Mitigation Ratio	Acreage of Mitigation
High Sensitivity				
Maritime Succulent Scrub (32400)	3.84	**0.22**	**3:1**	**0.66**
Medium Sensitivity				
Coastal Sage Scrub (32500)	12.41	**0.42**[a]	**2:1**	**0.84**
Coastal Sage Scrub – Disturbed (32500)	0.26	0[b]	2:1	0
Low Sensitivity				
Non-Native Grassland (42200)	2.04	0[b]	1:1	0
Not Sensitive				
Disturbed Habitat (11000)	1.44	0.35	NA	0
Eucalyptus Woodland (79100)	0.60	0.01	NA	0
Water	0.57	0	NA	0
Developed (12000)	24.40	9.29	NA	0
Total Acres	***45.56***	***10.29***	***NA***	***1.50***

a. Excludes trimming of coastal sage scrub shrub branches at the County recreational amenity site that have grown through or over the chain link fence that identifies the perimeter of the existing parking lot.
b. Non-native grassland (0.48 acre) and coastal sage scrub-disturbed (0.11 acre) in the project area are within an existing fire clearance zone and are maintained as cleared or thinned and impacts are not considered significant. Thus, they are excluded from the total acreage.

c. Indirect impacts to cactus wren from detrimental edge effects and construction noise shall be mitigated by:

   i. Avoidance of clearing, grading and construction adjacent to occupied habitat during the breeding season February 15 through August 15 shall be implemented. If such activities cannot be scheduled outside the breeding season, a pre-construction survey shall be conducted no more than 7 days prior to construction within the project site and a 300-foot buffer to confirm that the cactus wren are absent from the project construction zone. If the pre-construction survey is negative, no further actions are required. If the species are present, the Mitigation Plan

outlined in item 3d shall address project-specific edge effects and noise reduction measures.

ii. Avoidance of illuminating maritime succulent scrub with lighting within the campground;

iii. Enforcing the rules about pets (area restrictions and leashes) within and around the campground; and,

iv. Providing cactus wren education pamphlet to campground users at entry to campground outlining the sensitivity of the cactus wren and its cactus habitat.

d. The cactus wren habitat mitigation and indirect mitigation measures to avoid detrimental edge effects and noise outlined herein shall be developed in a Mitigation Plan that shall be submitted by the Helix Water District for review and approval by CDFW at least 30 days prior to initiating project impacts. The Mitigation Plan shall identify and provide direction for habitat creation or habitat conservation, and the prevention of indirect effects as identified in this mitigation measure.

Coastal California Gnatcatcher

4. Impacts to the coastal California gnatcatcher, if present, shall be avoided through the placement of a 300-foot no-clearing, grubbing, or grading buffer around any active breeding territories prior to construction as determined through protocol coastal California gnatcatcher breeding season surveys conducted the spring before work begins.

5. If direct impacts to nesting coastal California gnatcatchers cannot be avoided during the breeding season (February 15 to August 15), Helix Water District shall consult with USFWS and CDFW regarding the need to obtain an Incidental Take Permit. Any measures determined to be necessary through the Incidental Take Permit process to offset impacts to coastal California gnatcatcher may supersede measures provided in these coastal California gnatcatcher mitigation measures.

Other Sensitive Species

6. Potential direct impacts to other species shall be mitigated through the preservation of sensitive habitats that are suitable for these species (refer to Mitigation Measure BIO-2).

Bats

7. Surveys for bats shall be conducted prior to initiating project impacts that removes suitable daytime roosting areas. If sensitive bats occur, their roosts shall not be disturbed by project work until such time when a qualified biologist determines they are no longer in use.

Crotch's Bumble Bee

8. If the species is CESA-listed before project construction is initiated, a survey for Crotch's bumble bee shall occur within the April to August period prior to the start of construction. If Crotch's bumble bee are found to use an area, there shall

be a 60-foot buffer placed around that area until the season in which Crotch's bumble bee does not nest (September-March).

BIO-2: **Sensitive Habitats.** Prior to initiating project impacts to sensitive habitats, the Helix Water District shall mitigate impacts to 0.22 acres of maritime succulent scrub at a 3:1 mitigation ratio with a minimum of 0.66 acres of maritime succulent scrub by either creation on the west side of the Lake Jennings Campground or preservation off site in a parcel near the Lake Jennings Campground per Mitigation Measure BIO-1. Impacts to 0.42 acres of coastal sage scrub shall be mitigated at a 2:1 mitigation ratio with preservation of 0.84 acres of coastal sage scrub or maritime succulent scrub within the District lands at Lake Jennings; preservation at the off-site parcel south of Lake Jennings Road; creation of 0.84 acres of coastal sage scrub in addition to the 0.66 acres of maritime succulent scrub described in Mitigation Measure BIO-1 (and protected with a Conservation Easement); or purchase of mitigation credits from an approved Mitigation Bank.

BIO-3: **Nesting Birds.** All shrub trimming, thinning, or removal shall be performed prior to or after the bird-breeding season, January 1 through September 15 (i.e., only between September 16 and December 31). If clearing is planned to occur during the bird-breeding season, pre-construction nest surveys shall be conducted within 72 hours (three days) prior to any clearing. Surveys for active nests must be conducted by a qualified biologist to determine the presence/absence, location, and status of any active nests on or adjacent to the project site. Work may proceed if no active bird nests are detected. If active nests are discovered on site, a suitable buffer determined by the qualified biologist (e.g., 30 to 100 feet for passerines) should be established around such active nests. For raptors, the no-disturbance buffer shall be expanded to 500 feet. No ground-disturbing activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Limits of construction to avoid a nest site shall be established in the field by a qualified biologist with flagging and stakes or construction fencing. Construction personnel shall be instructed regarding the ecological sensitivity of the marked area. The results of the survey shall be documented and filed with the District. By avoiding clearing during the bird-breeding season or performing surveys to ensure no active nests are present prior to clearing, the proposed project would ensure compliance with the MBTA and pertinent sections of the CFG Code.

BIO-4: **Best Management Practices.** To avoid significant impacts on special-status resources and inadvertent disturbance to areas outside the limits of the proposed project activities, the following BMPs shall be implemented under the oversight of a qualified biologist:

a. To prevent inadvertent disturbance to areas outside the limits of work, the construction limits shall be clearly demarcated (e.g., installation of flagging or temporary visibility construction fence) prior to ground-disturbance activities, and all construction activities, including equipment staging and maintenance, shall be conducted within the marked disturbance limits. The work limit delineation shall be maintained throughout project construction.

b. Construction activities shall occur during daytime hours. The construction contractor shall place staging areas as far as feasible from sensitive habitats.

c. If trash and debris need to be stored on site overnight, fully covered trash receptacles that are animal-proof and weather-proof shall be used by the construction personnel to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Alternatively, standard trash receptacles may be used during the day but must be removed each night.

d. At the end of each workday during construction, the applicant, or its contractors, shall cover all excavated, steep-sided holes or trenches more than eight inches deep and that have sidewalls steeper than 1:1 (45-degree) slope with plywood or similar materials, or provide a minimum of one escape ramp per 100 feet of trenching (with slopes no greater than 3:1) constructed of earth fill or wooden planks. The project biologist shall thoroughly inspect holes and trenches for trapped animals during biological monitoring.

e. The applicant, or its contractors, shall screen, cover, or elevate at least 1 foot above ground, all construction pipe, culverts, or similar structures with a diameter of three inches or greater that are stored on site overnight. These pipes, culverts, and similar structures shall be inspected by the project biologist for wildlife before such material is moved, buried, or capped.

f. All artificial light sources permanently installed as part of the project shall be directed downward at the impact area, away from adjacent habitat. Light sources shall be anti-glare and shielded.

g. If landscaping is required, non-native plants shall be avoided; a palette of native, local species will be used for on-site revegetation/hydroseeding, if necessary.

h. All construction equipment shall be inspected for non-native seeds to avoid the spread of noxious invasives within and around the project site.

i. Any project landscaping shall not include species identified as an invasive non-native plant species as identified by the California Invasive Plant Council at http://www.cal-ipc.org/paf/.

SOURCES: Biology Report for the Lake Jennings Campground Improvements Project (Tierra Data 2025); San Diego Cactus Wren Results (Tierra Data 2025).

V. Cultural Resources

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
V.	CULTURAL RESOURCES. Would the Project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to in section 15064.5?	☐	☐	☐	☒
b)	Cause a substantial adverse change in the significance of an archaeological resource as defined in Public Resources Code sections 21083.2 and 21084.1, and CEQA Guidelines section 15064.5, respectively?	☐	☒	☐	☐
c)	Disturb any Native American tribal cultural resources or human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Project Impacts and Mitigation Measures

a) A built environment resource or historic resource is any building, structure, object, or district. Resources that are listed in or eligible for the National Register of Historic Places (NRHP) or the California Register of Historic Resources (CRHR), are considered historic resources for the purposes of CEQA. Historic resources are, or may be, significant architecturally or culturally in local, state, or national history. Historic resources on a project site may fall into three broad categories: individually eligible buildings, structures, and objects; historic districts; and historic landscapes. Lake Jennings, its dam, and the campground were constructed by the HWD in 1962 and first appear on the 1964 aerial photographs (ASM Affiliates 2025). The project site is currently developed with a campground, parking lot and internal loop road. None of the structures that occur on site were identified during the archival research (ASM Affiliates 2025). The only historic resource identified during the archaeological survey of the project site is Chet Harritt Dam, an earthen fill dam approximately 1,167 feet long, 975 feet wide, and 202 feet tall, with a paved road (i.e., Bass Road) running along the top of the dam. This resource is not associated with significant historical events or trends in local history and is not eligible for listing under Criterion 1. Although this dam was named for Chet Harritt (a former manager of the HWD), it is not associated with him, nor with any other historically significant persons, and as such is ineligible for listing under Criterion 2 (McCausland 2019). The dam does not embody unique or distinctive characteristics, nor is it the work of a master craftsman, and should not be considered significant under Criterion 3. Finally, there is no evidence for potential further information which can be gained through further investigation into this resource and is not recommended eligible under Criterion 4. Although the resource intersects with the project area, the project improvements are limited to repair and resurfacing the road and would not have the potential to impact the resource. Therefore, the potential for pre-historic or historic resources to be encountered during project construction is considered low. Implementation

of the project would not create a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines section 15064.5, and **no impact** would occur.

b) An Archaeological Survey of the project site was conducted by ASM Affiliates (2025). A records search was conducted for the project area and a 0.5-mile radius at the South Coastal Information Center (SCIC). A total of 21 cultural resources has been previously recorded within 0.5 miles of the project area; however, no sites have been recorded within the project site, with the exception of the historic Chet Harritt Dam, discussed above under Item V.a. The Native American Heritage Commission (NAHC) was contacted for a Sacred Lands File search. The response noted that a search was completed for the project area with positive results. Further coordination was recommended with the Barona Group of the Capitan Grande, Ewiiaapaayp Band of Kumeyaay Indians, the Kwaaymii Laguna Band of Mission Indians, the Sycuan Band of the Kumeyaay Nation, and the Viejas Band of Kumeyaay Indians; however, no further communication was received. Due to prior communications from the Viejas Band of Kumeyaay Indians requesting a Native American monitor be present for ground disturbing work on a prior project in the area, a representative of the Tribe was invited to participate on the survey conducted for this project. ASM completed a field investigation including an intensive pedestrian survey of the study area by an archaeologist and a Native American monitor. Visibility ranges from excellent to poor to fair during the survey. The ground visibility was impacted by dense vegetation, including both native and exotic species. The survey did not result in the identification of any cultural resources within the project site. Based on the results of the current study, no cultural resources would be directly affected by the development of the project. However, due to the cultural sensitivity of the project region coupled with the positive NAHC response and requests from tribal representative for monitoring on other projects at Lake Jennings, it is recommended that an archaeological and Native American monitoring program be implemented for ground disturbing activities. Therefore, the project would have the potential to cause a substantial adverse change in the significance of an unknown buried cultural resource. To address this impact, the project would implement **Mitigation Measure CUL-1**. Therefore, impacts related to the disturbance of unknown cultural resources, would be **less than significant with mitigation incorporated**.

c) Due to the fact that the project involves ground disturbance, construction activities may have the potential to disturb human remains, including those located outside of formal cemeteries. If human remains are encountered during grading or excavation, the project is required to comply with existing laws related to human remains, including California Health and Safety Code (CHSC) section 7050.5 and CEQA Guidelines section 15064.5(e). Section 7050.5 of the CHSC outlines protocol for the inadvertent discovery of human remains, while sections 7051 and 7052 identify the legal repercussions of removing remains from internment and their improper treatment. Section 7054 exempts the reburial of Native American remains pursuant to section 5097.94 from the definition of a misdemeanor. Section 7050.5(b) specifies protocol when human remains are discovered. CEQA Guidelines section 15064.5(e) requires that excavation activities be stopped whenever human remains are uncovered and that a coroner be called in to assess the remains. Compliance with these regulations in accordance with **Mitigation Measure CUL-2** would ensure a **less-than-significant-with-mitigation-incorporated** impact to human remains would occur.

Mitigation Measures

CUL-1: **Unknown Buried Cultural Resources.** The following procedures shall be undertaken during ground-disturbing activities:

The HWD or their representative shall implement an archaeological and Native American monitoring program and potential data recovery program. The archaeological and Native American monitoring program shall be described in a Monitoring and Discovery Plan submitted for approval to HWD and shall include the following requirements:

Preconstruction Contracting and Meeting

- Contract with a Qualified Archaeologist to serve as the Project Archaeologist and perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities, including but not limited to trenching for utilities and installation of BMPs and fencing. The Project Archaeologist shall subcontract with participating Tribes to conduct Native American monitoring for the Project. The Project Archaeologist and Native American monitor shall perform the monitoring duties before, during and after construction.
- Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor to explain the monitoring requirements. Participating Tribes shall be invited to pre-construction meeting(s). Any Kumeyaay Native American will be an approved representative of the participating Tribes.

Construction Monitoring and Reporting

- **Monitoring.** Both the Project Archaeologist and Kumeyaay Native American monitor are to be onsite during initial earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with a Kumeyaay Native American monitor. Both the Project Archaeologist and Kumeyaay Native American monitor shall evaluate fill soils to ensure that they are negative for cultural resources. If multiple Kumeyaay Tribes are interested in participating in the monitoring effort, a daily/weekly rotation shall be developed to allow equal time for observation. If cultural resources are identified during construction monitoring:
  - Both the Project Archaeologist and Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
  - The Project Archaeologist shall contact the HWD staff at the time of discovery.
  - The Project Archaeologist in consultation with the HWD staff and Kumeyaay Native American shall determine the significance of discovered resources.
  - The Project Archaeologist shall notify the Viejas Band of Kumeyaay Indians of the unanticipated discovery.

  - Should a potential Tribal Cultural Resource (TCR) be identified, the Project Archaeologist shall consult with consulting tribes for a final determination.
  - Construction activities will be allowed to resume after the HWD staff has concurred with the significance evaluation.
  - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a curation facility, onsite reinterment (if appropriate), or repatriation program.
  - If cultural resources discovered during construction are determined to be significant, a new or modified Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by HWD. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance). If data recovery and collection are required, after avoidance and re-design are attempted, an appropriate on-site location or curation facility shall be determined in consultation with the participating Tribes.

- **Weekly Reporting.** Weekly summaries of activities and results will be shared with participating Tribes. If grading activities exceed one month, the Project Archaeologist shall submit monthly status reports to the County Director of General Services and participating Tribes starting from the date of the notice to proceed to termination of implementation of the grading monitoring program. The reports shall briefly summarize all activities during the period and the status of progress on overall plan implementation.
- **Final Monitoring Report.** Upon completion of earth-disturbing activities (e.g., grading, trenching, etc.), the Project Archaeologist shall prepare a monitoring report identifying whether resources were encountered.
  - *No Resources Encountered.* If no archaeological resources are encountered during earth-disturbing activities, then a final Negative Monitoring Report substantiating that earth-disturbing activities are completed and no cultural resources were encountered shall be submitted. Archaeological monitoring logs showing the date and time that the monitor was on site and any comments from the Native American Monitor shall be included in the Negative Monitoring Report.
  - *Resources Encountered.* If archaeological resources were encountered during the earth disturbing activities, the Project Archaeologist shall provide an Archaeological Monitoring Report stating that the field monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during

monitoring and the anticipated time schedule for completion of the curation and/or repatriation phase of the monitoring.

- A copy of the monitoring report shall be provided to the Director of General Services, South Coastal Information Center, and any culturally affiliated tribe who requests a copy.
- The Final Monitoring Report shall include the following:
  - Department of Parks and Recreation Primary and Archaeological Site forms
  - Daily Monitoring Logs
  - Evidence that all cultural materials have been conveyed as follows:
    - Evidence that all pre-contact materials collected during the archaeological monitoring program have been submitted to a San Diego or Imperial County curation facility or a culturally affiliated Native American Tribal curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego or Imperial County curation facility or culturally affiliated Native American Tribal 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 pre-contact archaeological materials have been received and that all fees have been paid.

      or

      Evidence that all pre-contact materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. 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.

    - Historic materials shall be curated at a San Diego or Imperial County 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 or Imperial County 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.

CUL-2: **Human Remains.** The following procedures shall be described in a Monitoring and Discovery Plan submitted for approval to HWD and undertaken during ground-disturbing activities, if human remains are identified:

- The HWD or their representative shall contact the County Medical Examiner or representative when possible human remains are identified. The Project Archaeologist shall simultaneously inform the participating Tribes of the find.
- Upon identification of possible human remains, no further disturbance shall occur in the area of the find until the County Medical Examiner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by a participating Kumeyaay Native American monitor.
- If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
- The Project Archaeologist shall notify the Viejas Band of Kumeyaay Indians of the identification of human remains.
- 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.
- 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.

SOURCE: Archaeological Survey for the Lake Jennings Campground Improvement Project (ASM Affiliates 2025).

VI. Energy

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

Project Impacts and Mitigation Measures

a) Project construction would result in temporary energy consumption and one-time, non-recoverable energy associated with construction of the campground and recreational amenity improvements. Energy consumption as a result of construction of the proposed project would primarily consist of the consumption of fossil fuels (i.e., diesel and gasoline) as a result of the use of off-road construction equipment, movement of soil, delivery of materials, and use of on-road vehicles for worker commuting and vendors. The temporary demand for energy associated with construction would cease upon completion of the project construction activities. The petroleum consumed during project construction would be typical of similar construction projects and would not require the use of new petroleum resources beyond what are typically consumed in California. Based on these considerations, construction of the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources.

The proposed campsite improvements include adding utility hookups. The amount of energy usage associated with campground utility hookups is minimal. The provision of utility hookups for campground sites and cabins would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Additionally, a certain amount of additional fossil fuel resources demand would be produced when campground users travel to/from the park to use the redeveloped campground sites and associated recreational facilities. The proposed project would increase the total number of campground sites from 97 up to 107. While this would potentially increase users at the site, the increase would not result in an operational energy impact due to wasteful, inefficient, or unnecessary consumption of energy resources. **Less-than-significant** impacts would occur.

b) The project would be built in accordance with all applicable regulations governing energy usage and efficiency. State plans for renewable energy and energy efficiency include CARB's 2022 Scoping Plan for Achieving Carbon Neutrality, the 2021 Integrated Energy Policy Report, and the California Renewables Portfolio Standard Program. These state plans do not include regulations that would apply to a campground site redevelopment project; therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Accordingly, the project would not conflict with existing energy standards or regulations, and impacts would be **less than significant**.

SOURCE: 2022 Scoping Plan for Achieving Carbon Neutrality, Final 2021 Integrated Energy Policy Report, and California Renewables Portfolio Standard Program (California Public Utilities Commission 2025).

VII. Geology and Soils

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
VII.	GEOLOGY AND SOILS. Would the Project:				
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of injury, damage or death involving?				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Map issued by the State Geologist for the area or based upon on other substantial evidence of a known fault?	☐	☐	☒	☐
	ii) Strong seismic ground shaking?	☐	☐	☒	☐
	iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	iv) Landslides?	☐	☐	☒	☐
b)	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) The project would not directly or indirectly cause potential substantial adverse effects, including the risk of injury, damage or death as follows:

i) Similar to the majority of southern California, the site is located in a seismically active area and the potential for strong ground motion is considered significant. Major known active faults in the region consist generally of in echelon, northwest striking, right-lateral,

strike-slip faults. The active Rose Canyon fault zone is located approximately 20 miles west/northwest of the proposed project site. Other active fault zones in the region that could possibly affect the project site include the Coronado Bank, San Diego Trough, and San Clemente Fault Zones to the west, the Palos Verdes and Newport Inglewood Fault Zones to the northwest, and the Elsinore, Earthquake Valley, San Jacinto, and San Andreas Fault Zones to the northeast. The Elsinore fault zone is located approximately 33 miles northeast of the proposed project area. The San Jacinto fault zone is located approximately 50 miles northeast of the proposed project area. The site is not included in any Alquist-Priolo Act Earthquake Fault Zones and there are no known major or active faults on or in the immediate vicinity of the site. For this reason, the potential for surface rupture at the site is considered low. The proposed campground site redevelopment and recreational amenities would be designed in accordance with the minimum seismic design parameters of the California Building Code (CBC; latest edition) and applicable ASTM International specifications upon which the CBC standards are based. Accordingly, the potential for ground rupture is very low and impacts related to the exposure of people or structures to geologic hazards associated with rupture of a known earthquake fault would be **less than significant**.

ii) The project site, like the rest of southern California, is located within a seismically active region as a result of being located near the active margin between the North American and Pacific tectonic plates. Ground shaking as a result of movement along an active fault in the vicinity of the project area has the potential to affect the proposed campground site development. Construction of the project would incorporate measures to accommodate projected seismic loading, pursuant to existing guidelines such as the International Building Code (IBC; International Code Council 2015), CBC (CCR Title 24, Part 2), County of San Diego requirements, and geotechnical recommendations. The project includes the installation of four prefabricated cabins. These structures and the graded pads they are placed on would be constructed to appropriate geotechnical standards to minimize risk associated with ground shaking. The remainder of the proposed improvements do not include structures intended for habitation. Compliance with standard building requirements would ensure that project impacts associated with ground shaking would be **less than significant**.

iii) Liquefaction potential is based on soil strength and the presence of a shallow water table. The project site is not designated as a potential liquefaction area (County of San Diego 2011, Figure 2.6-3; County of San Diego 2025). Campground site redevelopment would incorporate measures to accommodate the potential for liquefaction hazards during a seismic event, in accordance with the IBC, CBC and County of San Diego requirements. A geotechnical engineer would perform an inspection to approve any excavations or fills prior to construction. Inspection findings would be submitted by the geotechnical engineer to the County. Soils removal, backfilling, and recompaction would be performed per any soils report recommendations under the supervision of the geotechnical engineer's supervision and inspection. Therefore, the project would result in **less-than-significant** impacts due to liquefaction.

iv) Landslide activity generally occurs in areas where slopes are steep (typically 30 percent or more) and lack vegetation. The project site is designated as generally susceptible to landslides (County of San Diego 2025). The campground site is located on top of a hill.

The amenity site to the south of the campground consists of an asphalt paved area with a small hillside to the east that borders Lake Jennings. A vegetated area bordering the asphalt paving to the south slopes towards the lake at grades varying between 1 and 6 percent. The slope within Bass Drive varies between 1 and 15 percent grade and steep hillsides surrounding the project site can reach up to 60 percent slope (Nasland Engineering 2025). Grading for site development would provide campsite pads and graded pads for the recreational amenities. These pads would be graded in accordance with IBC, CBC, County of San Diego, and geotechnical requirements identified by a geotechnical engineer. As discussed above, a geotechnical engineer would perform an inspection to approve any excavations or fills prior to construction. Inspection findings would be submitted by the geotechnical engineer to the County. Soils removal, backfilling, and recompaction would be performed per any soils report recommendations under the supervision of the geotechnical engineer's supervision and inspection. Compliance with existing requirements and geotechnical recommendations would ensure impacts associated with landslides are **less than significant**.

b) Construction activities associated with grading or other ground disturbance has the potential to result in temporary erosion or sedimentation during construction. Potential short-term erosion and sedimentation impacts would be addressed through compliance with applicable regulations as specified by the RWQCB. As discussed in Section X, below, to address potential water quality impacts, the project would comply with NPDES Municipal Separate Storm Sewer Systems (MS4) permit requirements and implement the project's Stormwater Quality Management Program (SWQMP), which would outline BMPs to be implemented, pursuant to the County of San Diego BMP Design Manual. Specifically, this would entail implementing appropriate measures to comply with requirements of the following regulations: (1) County of San Diego Watershed Protection Ordinance (Sections 67.801 et seq.); and (2) the NPDES Construction General Permit (NPDES No. CAS000002, SWRCB Order 2009-0009-DWQ, as amended). Construction stormwater BMPs are required to be shown on the project grading plan and would be provided in the SWPPP for the project. Typical erosion and sediment control measures that may be required in the project's SWPPP include the following: (1) seasonal grading restrictions during the rainy season (October 1 to April 30) for applicable areas; (2) preparation and implementation of a Construction Site Monitoring Program (CSMP), and, if applicable, a Rain Event Action Plan (REAP) to provide enhanced erosion and sediment control measures prior to predicted storm events; (3) use of erosion control/stabilizing measures such as geotextiles, mats, fiber rolls, or soil binders; (4) use of sediment controls to protect the site perimeter and prevent off-site sediment transport, including measures such as silt fencing, fiber rolls, gravel bags, temporary sediment basins, street sweeping, stabilized construction access points and sediment stockpiles, and use of properly fitted covers for sediment transport vehicles; (5) compliance with local dust control measures, and (6) implementation of additional BMPs as necessary to ensure adequate erosion/sediment control and regulatory conformance.

Additionally, erosion control measures would be implemented on exposed soil utilizing BMPs. These BMPs include installing fiber blankets and bonded fiber matrix, installing new vegetation, and/or maintaining existing vegetation. Eroded areas would be immediately repaired and stabilized, while inactive slopes would be protected and stabilized. All exposed soils including active and inactive slopes would be protected prior to rain events. As described in Section X(a), below, construction and operational BMPs would be implemented

in compliance with applicable stormwater regulations to reduce potential water quality impacts, including those associated with increased erosion and siltation.

Based on implementation of appropriate erosion and sediment control BMPs as part of, and in conformance with, the project SWPPP and related County and NPDES requirements, associated potential topsoil erosion impacts would be **less than significant**.

c) As discussed above in Section VII(a)iv, the project site is not designated as a potential liquefaction area but is categorized as being generally susceptible to landslides. To avoid potential impacts resulting from seismic-related ground failure or other possible geologic impacts, a geotechnical engineer would perform an inspection to approve the excavations or fills prior to construction. Inspection findings would be submitted by the geotechnical engineer to the County. The project would implement all necessary recommendations contained in the soils report. Potentially unstable materials present within the project area (fill and surficial alluvium) would be addressed through the required inclusion of geotechnical recommendations and conformance with applicable regulatory requirements. Such measures would include provisions related to the removal of unsuitable materials; composition and placement methodology (e.g., compaction) of materials used as backfill; and appropriate seismic, drainage, structure, foundation, and pavement design, pursuant to standards from regulatory/industry sources including the County and CBC. Conformance with the described geotechnical recommendations and regulatory/industry standards as a matter of project design would effectively avoid or reduce potential effects from unstable soils. Impacts would be **less than significant**.

d) Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, perched groundwater, drought, or other factors and may result in unacceptable settlement or heave of structures or pavements supported on grade. Expansive soils have not been identified on the project site (County of San Diego 2025). The geotechnical engineer would perform an evaluation of on-site soils and submit the findings to the County. The project would implement all necessary recommendations contained in the soils report. Therefore, a **less-than-significant** impact would occur.

e) The project would not involve the use of septic tanks or alternative wastewater disposal systems. **No impact** would result from implementation of the project.

f) Impacts to paleontological resources generally occur from the physical destruction of fossil remains by excavation operations that cut into geologic formations. The potential for significant impacts to paleontological resources to occur is based on the extent that a geologic formation would be disturbed and the potential for those geologic formations to contain fossils. The site is underlain by Upper Jurassic and Lower Cretaceous Marine and Nonmarine formations, which have marginal potential for fossil resources (County of San Diego 2025). According to the General Plan Update Final EIR (County of San Diego 2011), marginal sensitivity is assigned to geologic formations that are composed either of volcaniclastic or metasedimentary rocks, but that nevertheless have a limited probability for producing fossils from certain formations at localized outcrops. Project grading has the potential to reveal paleontological resources when disturbed by construction. However, it is anticipated that grading, in particular cut, would be limited to approximately 3,800 cy, with a

maximum depth of 8.3 feet below ground surface (limited deeper trenches may be required for utilities), and would not extend to depths that would impact paleontological resources. At shallow depths, project grading would not likely yield intact fossil resources. Therefore, project impacts to paleontological resources would be **less than significant**.

Unique geological features generally are defined to include geologic structures, formations, or other features that exhibit unusual or important characteristics in the context of scientific information (e.g., rare geologic/mineral assemblages or structural features), economic considerations (e.g., economically valuable mineral deposits), or cultural perception (e.g., prominent, unusual, and/or aesthetically pleasing rock outcrops or exposures). Because the project area does not encompass any distinct or unique geologic characteristics, information or features as described, **no impact** would occur.

SOURCES: County of San Diego PDS – Zoning and Property Information (County of San Diego 2025). San Diego Country General Plan Update Final Environmental Impact Report (County of San Diego 2011).

VIII. Greenhouse Gas Emissions

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) GHGs are emitted by natural processes and human activities primarily associated with (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and (4) solid waste decomposition. Emissions of GHGs in excess of natural ambient concentrations are thought to be responsible for the enhancement of the greenhouse effect and contributing to what is termed "global warming," the trend of warming of the Earth's climate from anthropogenic activities. Global climate change impacts are by nature cumulative; direct impacts cannot be evaluated because the impacts themselves are global rather than localized impacts.

The County's Final 2024 Climate Action Plan (CAP) was adopted in September 2024 (County of San Diego 2024). A lead agency may conclude that a project's GHG impact is not cumulatively significant if the project demonstrates consistency with the CAP, which is a

qualified GHG reduction plan under CEQA (CEQA Guidelines Section 15183.5[h][3]). The CAP sets GHG reduction targets and proposes achievable, locally based strategies to reduce GHG emissions. The state's GHG reduction targets established in Senate Bill (SB) 32 set a goal to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. Utilizing a 2019 County GHG emissions inventory and following the state's GHG reduction targets, estimated equivalent reductions at the local level would need to reduce emissions to 43.6 percent below 2019 levels by 2030 and 85.4 percent below 2019 levels by 2045.

The proposed project is not a new development project but rather redevelopment of an existing campground site and construction of new recreational amenities at an existing recreational site. There are no land use or zoning designation changes proposed. A CAP Consistency Review Checklist was prepared for the project (Baranek Consulting Group 2025). Based on the nature of the project and the non-applicability of many of the CAP measures identified in the Checklist, it was determined that the project would not generate an excessive amount of GHG emissions, and a **less-than-significant** impact would occur.

b) The project is the redevelopment of an existing campground and addition of a recreational amenity being added to an existing park and would not generate growth in population or employment or require the alteration of an existing land use designation through amendment(s) to the County's General Plan or changes to zoning. Long-term operation of the campground and recreational amenities would not result in a substantial increase in GHG emissions from maintenance activities or traffic trips, compared to the existing condition. As demonstrated in the project's CAP Consistency Review Checklist, many of the CAP measures identified in the Checklist do not apply to the project. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, including the County's 2024 CAP. The impact would be **less than significant**.

SOURCES: Final 2024 Climate Action Plan (County of San Diego 2024); CAP Consistency Review Checklist (Baranek Consulting Group 2025).

IX. Hazards and Hazardous Materials

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
IX.	HAZARDS AND HAZARDOUS MATERIALS. Would the Project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, emission or disposal of hazardous materials?	☐	☐	☒	☐
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e)	For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) The project would not require the routine transport, use, or disposal of large quantities of hazardous materials. During construction activities, small amounts of hazardous materials may be present on site (such as fuels, lubricants, solvents, etc.); however, these materials would be present in small quantities and typical of those used in construction activities. Long-term project operations would potentially involve the use of small amounts of hazardous materials, such as cleaning products, paints, and chemical pesticides in certain instances (e.g., landscape maintenance). These materials would be similar to those already in use at the campground for typical cleaning and maintenance activities. Any such materials would be stored, handled, used, and disposed of in accordance with applicable regulations and requirements related to hazardous materials, and would not create a significant hazard to the public or environment. **Less-than-significant** impacts would occur.

b) As discussed above, the project does not include uses that would result in the introduction of new hazardous materials or substances within the project area. Construction would involve typical construction equipment and on-site use and storage of hazardous materials. The construction contractor would be required to use standard construction controls and safety procedures to avoid or minimize the potential for accidental release of such substances into the environment. Applicable regulatory requirements associated with the possible release of hazardous materials during construction- and demolition-related

activities would be met through implementation of a SWPPP and related BMPs as described below in Section X to this IS/MND. Additionally, small quantities of hazardous materials typical of cleaning and maintenance activities may be present during operation of the project. The level of risk associated with the accidental release of hazardous substances would not be considered significant, due to the small volume and low concentration of hazardous materials anticipated to be present on site. Therefore, impacts would be **less than significant**.

c) The nearest school to the project site is Foothills Christian Elementary School located approximately 0.75 miles west of the project site. Redevelopment of the campground site does not include components that would emit hazardous materials. Similar to the existing campground operations, only small amounts of hazardous materials associated with cleaning and maintenance would be present at the project site during long-term operation. The level of risk associated with the potential accidental release of other hazardous substances during construction and operational maintenance activities is not considered significant, as described above under Item IX.b. There are no schools within 0.25 miles of the project site. A **less-than-significant** impact would occur.

d) Pursuant to Government Code Section 65962.5 (Cortese List) requirements, the State Water Resource Control Board (SWRCB) GeoTracker database (SWRCB 2025), and the California Department of Toxic Substances Control (DTSC) EnviroStor database (DTSC 2025) were searched for hazardous materials sites within 0.25 miles of the project area. Based on a review of these databases, there are no hazardous materials sites located within the project area. Therefore, the project would not cause a significant hazard to the public or the environment related to a hazardous materials site, and **no impact** would occur.

e) The project is not located within an airport influence area or within 2 miles of a public or public use airport and is not subject to the requirements of any airport land use compatibility plan. Therefore, the project would not result in a noise or safety hazard for people residing or working in the project area. **No impact** would occur.

f) Pertinent information regarding emergency response in the project area vicinity is provided in the County of San Diego General Plan and related documents. The County General Plan includes information on emergency evacuation in the Mobility and Safety elements, with reference to the Office of Emergency Services Unified San Diego County Emergency Services Organization Operational Area Emergency Plan (County of San Diego 2022). Specifically, Annex Q (Evacuation) of the plan notes that: "Primary evacuation routes consist of major interstates, highways and prime arterials within San Diego County …," with Interstate 8 and State Route 67 identified in the project vicinity. The County plan also notes that "Local jurisdictions will work with … applicable agencies/departments to identify evacuation points and transportation routes." Both sites for the project are accessible from Bass Road, the internal access road that parallels the lake's shoreline and connects with Lake Jennings Park Road via Harritt Road. The project includes repaving or resurfacing and restriping Bass Road from its westernmost intersection with Harritt Road to the campground. A new concrete driveway connection to Bass Road from the southern site would be constructed as part of the project. Roadway improvements associated with the project would involve temporary lane closures along Bass Road and Bass Drive that would be managed through a traffic control plan to ensure no impacts to emergency response or evacuation plans would occur.

Additionally, Harritt Road and Bass Road would remain accessible on the south side of Lake Jennings, to the east of the amenity site, ensuring access to the loop road around Lake Jennings is available while temporary closures occur during roadway and driveway connection access construction. In addition, the District is in the process of having the adjacent loop road connection between the campground and the existing access road along the northern shoreline paved to facilitate emergency access. Access and road improvements would not alter access on area roadways outside of the campground area and would not affect emergency access in the surrounding area. During operation of the project, there would be no access restrictions on area roadways. Therefore, while temporary access restrictions would occur during roadway and driveway access work, the campground would be unoccupied during construction activities. All access would be restored prior to campground occupation. Impacts associated with emergency response or evacuation plans would be **less than significant**.

g) The project site is located within a Very High Fire Hazard Severity Zone (CALFIRE 2025). The construction phase of the project could potentially increase the risk of fires on a short-term basis, if, for example, equipment-related fires were accidentally started at the site. The probability for such fires to occur is low, however, and construction equipment would be outfitted with spark arrestors and other fire protection features such as on-board fire extinguishers. Campfires are only permitted within designated fire rings in the existing condition and the same restrictions would apply following construction of the campground site redevelopment. The proposed project would not involve the placement of new structures intended for long-term occupation but rather campsites (which already exist at the site) and new cabins intended for short-term stays. Structures would be constructed consistent with requirements governing fire safety, including the 2022 California Fire Code and County of San Diego 2023 Consolidated Fire Code, and fuel management and brush clearing would continue to be conducted around the campground to minimize risk. As a result, potential impacts associated with short- and long-term fire hazards from project construction would be **less than significant**.

SOURCES: GeoTracker database (SWRCB 2025); EnviroStor database (DTSC 2025); Fire Hazard Severity Zone Viewer (CALFIRE 2025); Office of Emergency Services Unified San Diego County Emergency Services Organization Operational Area Emergency Plan (County of San Diego 2022); County of San Diego General Plan Safety Element (County of San Diego 2011); County of San Diego 2023 Consolidated Fire Code (County of San Diego 2023).

X. Hydrology and Water Quality

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
X.	HYDROLOGY AND WATER QUALITY. Would the Project:				
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course or a stream or river or through the addition of impervious surfaces, in a manner that would:				
	i) Result in substantial erosion or siltation on or off site;	☐	☐	☒	☐
	ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☒	☐
	iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
	iv) impede or redirect flood flows?	☐	☐	☐	☒
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) The project site is within the jurisdiction of the San Diego RWQCB, which is tasked with protecting the region's water quality objectives that meet the standards set forth in the Section 303 of the federal Clean Water Act as well as the state's Porter-Cologne Water Quality Act. The RWQCB designates beneficial uses of surface water and groundwater, sets qualitative and quantitative water quality objectives that must be met to protect designated beneficial uses, and develops implementation programs to protect the regional water resources through its Water Quality Control Plan for the San Diego Basin (the Basin Plan).

Potential project-related water quality impacts would be associated with short-term construction activities. Construction of the project could potentially result in the release of sediments, nutrients, trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses, pesticides, and heavy metals into runoff from the project area. The short- and long-term discharge of pollutants from the project area could potentially result in

significant water quality impacts to downstream receiving waters. Stormwater flows from the project site enter Lake Jennings.

To address potential water quality impacts, the project would comply with NPDES Municipal Separate Storm Sewer Systems (MS4) permit requirements to develop a SWQMP which would outline construction and permanent BMPs to be implemented, pursuant to the County of San Diego BMP Design Manual. Construction stormwater BMPs would be implemented for erosion and sediment control, energy dissipation, materials management, and waste management. Specific BMPs would be identified during preparation of the Project's final SWQMP. Construction stormwater BMPs are required to be shown on the project grading plan and would be provided in the SWPPP for the project.

The project would result in a reduction of impervious areas at the project site through the removal of concrete/asphalt surfaces and the installation of decomposed granite walkways, plaza areas, playground areas, dog park amenities, and new landscaping throughout the campground and County recreational amenity site. Additionally, an on-site drainage system would be installed to direct runoff to Lake Jennings. Due to runoff entering Lake Jennings, treatment of stormwater is not required for the project at the campground site. Self-mitigating areas would be incorporated throughout the project site to provide stormwater treatment for pollutants, where practical, and an onsite biofiltration basin would be constructed at the south end of the dog park at the County recreational amenity site. Implementation of project BMPs, along with regulatory compliance, would preclude violations of applicable standards and discharge regulations. Project impacts related to water quality would be **less than significant**.

b) The project does not propose the use of local groundwater supplies or the construction of groundwater wells. Impervious surfaces at the project site cover 196,053 SF in the existing condition. Following construction of the project, there would be 168,271 SF of impervious surfaces, resulting in a reduction of 27,782 SF of impervious surfaces at the project site. The project includes placement of pervious surfaces with decomposed granite walkways and plaza areas and new landscaping throughout the campground, plus the removal of pavement at the County recreational amenity site to install a playground and dog park. Infiltration of runoff through those pervious surfaces and ultimate drainage of impervious areas directly into Lake Jennings ensures that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be **less than significant**.

c) In the existing condition, drainage at the campground consists of two drainage basins, split apart by a ridge running through the middle of the site. The ridge splits the flow, with one half draining towards Lake Jennings and one half draining inland (Nasland Engineering 2025). At the County recreational amenity site, a ridge line runs across the middle of the existing asphalt parking lot, splitting runoff flows between Bass Drive and Lake Jennings. The existing high point on Bass Drive directs flow north and south, dividing the County recreational amenity site into three drainage basins, with all stormwater outletting into Lake Jennings. Drainage for the project has been designed to maintain existing drainage patterns, to the maximum extent possible; however, the proposed drainage has been designed to redirect stormwater that would be flowing away from the lake into systems that would outlet

towards Lake Jennings. The project includes a drainage system to accommodate all non-self-mitigating drainage areas to convey runoff to outlet into Lake Jennings.

i) As described in Item X.a, the project would implement BMPs during and after construction to prevent substantial erosion or siltation on- or off-site. **Less-than-significant** impacts would occur.

ii) Based on the project-specific Hydrology Report (Nasland Engineering 2025), under pre-project conditions, the site produces 23.63 cubic feet per second (cfs) of runoff (i.e., Q_{100}) to Lake Jennings, 23.49 cfs that runs off site away from the lake, and 5.88 cfs from the amenity site. The project improvements would result in a 100-year peak flow of approximately 39.9 cfs that enters Lake Jennings, 10.67 cfs that runs off site away from the lake, and 3.87 cfs at the amenity site. The project improvements would result in an overall increase of 69.9 percent in runoff towards Lake Jennings, an overall decrease of 54.8 percent in runoff away from Lake Jennings, and an overall decrease of 34.2 percent in runoff from the County recreational amenity site. These increases and decreases are due to a larger area within the project site being routed to Lake Jennings, as well as the decrease in impervious area at the County recreational amenity site. This drainage system includes a curb inlet, storm drain line, and concrete energy dissipater all of which are properly sized through hydraulic analysis. Drainage patterns for the proposed condition would be altered as compared to the existing condition to route more runoff to Lake Jennings. However, drainage has been sized to ensure the amount of surface runoff associated with the project would not result in flooding on- or offsite. **Less-than-significant** impacts would occur.

iii) The project would implement BMPs during and after construction prior to discharging runoff. The proposed on-site drainage and water quality improvements integrated into the project and described in Items X.a and X.b.ii, would be sized to ensure that the project would not create or contribute runoff water at rates and amounts which would exceed the capacity of existing or planned stormwater drainage systems. Due to runoff entering Lake Jennings, treatment of stormwater at the project site is not necessary. At the amenity site, a biofiltration basin at the south end of the dog park has been properly sized to treat any stormwater and debris from stormwater runoff. **Less-than-significant** impacts would occur.

iv) The project is not located in a floodplain (County of San Diego 2025). A small portion in the northwest corner of the campground site parcel and in the eastern portion of the campground site parcel (both areas are outside of the project limits of construction) is within a dam inundation zone. Additionally, a small portion of the parcel for the County recreational amenity site is within a dam inundation zone, but this area is also outside of construction work limits. All runoff produced in the post-construction condition would be directed to Lake Jennings. Therefore, the project would not impede or redirect flood flows, and **no impact** is identified.

d) The project area is not within a 100-year floodplain, as described above in Item X.c.iv, and would implement BMPs during construction to reduce potential effects related to release of pollutants during flooding. Tsunamis are caused by displacement of the ocean floor causing large waves and are typically generated by seismic activity. Because the project is located approximately 22 miles from the Pacific Ocean, a tsunami hazard is not present. The project

site would not be subject to flood hazards associated with a 100-year floodplain or tsunamis and, therefore, would not release pollutants from such events. A seiche is a standing wave in an enclosed or partly enclosed body of water and is normally caused by earthquake activity. The nearest body of water is the adjacent Lake Jennings; however, due to the elevated nature of the campground redevelopment project site in relation to Lake Jennings, flooding from a seiche is not expected to be a hazard at the campground redevelopment site. The County recreational amenity site is located at a lower elevation than the campground redevelopment site, with a reduced elevational difference between the County recreational amenity site and Lake Jennings. The low point of the County recreational amenity site is approximately 711 feet above MSL. The surface water at Lake Jennings is approximately 695 feet above MSL, approximately 16 feet lower than portions of the adjacent County recreational amenity site (Nasland Engineering 2025d). Depending on the severity and scale of a seiche, the County recreational amenity site may be subject to flood hazards associated with a seiche. The proposed uses of the County recreational amenity site are limited to a playground, dog park, DG-surface parking lot, and accessible walkway. Inundation of the County recreational amenity site from a seiche may result in a minor release of pollutants such as oil and grease from the parking lot, animal waste from the dog park, and sediment from DG; however, this risk of pollutants, in the event a seiche occurs and inundates the County recreational amenity site, would not be a substantial release of pollutants and would likely be similar to that which would occur during a storm event. A biofiltration basin would be placed to collect runoff from the dog park would help to filter some pollutants, but if the site is inundated, the basin would be overwhelmed, and pollutants would be released into Lake Jennings. However, due to the remote possibility of a seiche at the site, and the proposed uses and associated pollutants that would be present at the County recreational amenity site, impacts associated with the risk of pollutants due to inundation from a seiche would be **less than significant**.

e) Refer to Items X.a through X.d. The project would comply with all stormwater quality standards during construction and operation, and appropriate BMPs would be implemented to address potential water quality impacts. Impacts would be **less than significant**.

SOURCES: Hydrology Study for Lake Jennings Campground Improvements (Nasland Engineering 2025a); Priority Development Project SWQMP (Nasland Engineering 2025b); County of San Diego PDS – Zoning and Property Information (County of San Diego 2025); Grading and Drainage Plan (Nasland Engineering 2025d).

XI. Land Use and Planning

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XI.	LAND USE AND PLANNING. Would the Project:				
a)	Physically divide an established community?	☐	☐	☐	☒
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) The project proposes campground site redevelopment, including the construction of recreational amenities. The proposed redevelopment and new amenities would occur within the existing Lake Jennings campground and parking area. Development of the project would not remove any uses or physically divide an established community. **No impact** would occur.

b) The Lakeside Land Use Map of the General Plan designates the site Public Agency Lands (Figure LU-A-10; Lakeside Land Use Map) and the site is zoned Open Space. The proposed campground site redevelopment is consistent with the land use and zoning designations for the property and the County has agreed to allow the campground improvements under the campground's current zoning designation (Open Space). The Helix Water District is not a participating entity of any adopted habitat conservation plans for the region, such as the MSCP; however, as discussed in Response IV.f, the District follows the provisions of the South County MSCP where applicable. With the implementation of mitigation for impacts to habitats and covered sensitive species (Mitigation Measures BIO-1 through BIO-4) to County MSCP Subarea Plan standards, the project would be in compliance with the County MSCP Subarea Plan and would not conflict with the MSCP. Therefore, the project would not cause a significant environmental impact due to a conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be **less than significant**.

SOURCES: County of San Diego PDS – Zoning and Property Information (County of San Diego 2025); County of San Diego General Plan (County of San Diego 2011).

XII. Mineral Resources

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

Project Impacts and Mitigation Measures

a) The Surface Mining and Reclamation Act of 1975 required the classification of land into mineral resource zones (MRZ), according to known or inferred mineral resource potential. The process was based solely on geology, without regard to existing land use or land ownership. The project is located in an area designated as MRZ-3, which includes areas where mineral resource significance is undetermined (County of San Diego 2011). The project site is currently utilized as a campground and parking lot at Lake Jennings and is not used for mineral extraction purposes. Therefore, **no impact** related to the loss of a known mineral resource or locally important mineral resource recovery site would occur.

b) There are no mineral resource recovery sites or mineral extraction activities occurring at the project site, as it is currently utilized as a campground and parking lot. Therefore, implementation of the project would not result in the loss of availability of a locally important mineral resource recovery site. **No impact** would occur.

SOURCE: San Diego Country General Plan Update Final EIR (County of San Diego 2011).

XIII. Noise

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XIII.	NOISE. Would the Project:				
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b)	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c)	For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within 2 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?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a) Project construction would generate temporary noise from the operation of construction equipment and construction activities at the project site. Construction would be limited to daytime hours and noise generated would be required to comply with County noise standards. Construction noise in the County is regulated by the County of San Diego Noise Ordinance (San Diego County Code of Regulatory Ordinances Title 3, Division 6, Chapter 4, Section 36.401). The Noise Ordinance establishes hours of operation for construction equipment, restricting operation of construction equipment between 7 p.m. and 7 a.m. and on Sundays or holidays; establishes sound level limitations of construction equipment; and sound level limitations on impulsive noise, among other things. The operation of construction equipment is not allowed between 7 p.m. and 7 a.m., except for emergency work. Section 36.409 also prohibits operation of construction equipment or combinations of construction equipment that generate noise levels in excess of 75 decibels (dB) for an eight-hour period between 7 a.m. and 7 p.m. at the nearest property line.

Short-term noise impacts could occur during the construction of the project. Construction personnel and construction equipment and materials deliveries to the site would incrementally increase noise levels on local roads leading to the site. Noise would also be generated during excavation, grading, and installation of project components on the project site. Construction of the project would be completed in phases, each of which would have its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. A standard

condition requires contractor compliance with the County Noise Ordinance with regard to construction activity hours and noise levels. Therefore, **less-than-significant** construction noise impacts would occur.

After construction of the project is complete, operational activities and related noise that occurred under the pre-project conditions would resume. These activities include occasional maintenance and recreational use of the project area. The project would result in an increase in camp sites and new recreational amenities, which may result in an increase in site usage; however, noise associated with recreational uses at the site are anticipated to be similar to those occurring in the existing condition. Any increase in noise associated with increased usage (including vehicle trips and user-generated noise) is not expected to result in perceptible changes to traffic noise or campground noise in the project area. As a result, operational noise would not conflict with local policies, and impacts would be **less than significant**.

b) Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernible but without the effects associated with the shaking of a building there is less adverse reaction. Vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in ground distance. The County of San Diego Guidelines for Determining Significance for Noise (County of San Diego 2009) identifies land use categories that may be affected by groundborne vibration, including: buildings where low ambient vibration is essential for interior operations, such as research and manufacturing facilities with special vibration constraints (Category 1); residences and buildings where people normally sleep such as hotels and hospitals (Category 2); and institutional land uses with primarily daytime use such as schools, churches, libraries, etc. (Category 3). Nearby land uses are low density and rural in nature, but residential land uses are located as near as 260 feet from project construction boundaries. No vibration-sensitive buildings, such as medical offices or research facilities, or known structurally sensitive buildings are located in close proximity to the project area. The nearest residence to the project area are residences in Lake Jennings Park Estates, a mobile home community to the south of the amenity site, approximately 260 feet to the south of the amenity site. Per Federal Transit Administration vibration criteria provided in the County of San Diego Guidelines for Determining Significance for Noise (County of San Diego 2009), an impact would occur if construction would generate vibration levels greater than 0.0040 in/sec for frequent events (70 or more vibration events per day), or 0.010 in/sec for occasional or infrequent events (less than 70 vibration events per day). According to Table 2.11-15 in the General Plan Update Final EIR, bulldozers and other heavy tracked construction equipment generate vibration levels of 30–100 vibration decibels and 0.003–0.01 in/sec at 50 feet from the source. The maximum of 0.01/sec identified for heavy tracked construction equipment vibration at 50 feet is the groundborne vibration impact levels identified in the County's threshold. Since construction activities would occur no closer than 260 feet from the nearest residential uses, and groundborne vibration would be reduced below 0.01 in/sec at distances greater than 50 feet, project construction would not generate vibration in excess of the identified impact levels. Groundborne vibration levels at other nearby residential uses at distances beyond 260 feet would also be below the daytime threshold. Therefore, vibration as a result of construction of the proposed project would be below the County's thresholds. No operational sources of vibration are proposed by the project. Impacts would be **less than significant**.

c) The project is not located within an airport influence area or within 2 miles of a public or public use airport and is not subject to the requirements of any airport land use compatibility plan. Aircraft noise would not adversely impact the project site and **no impact** is identified.

SOURCES: County of San Diego Noise Ordinance (County of San Diego 2008); County of San Diego Guidelines for Determining Significance (County of San Diego 2009).

XIV. Population and Housing

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

Project Impacts and Mitigation Measures

a) The project is proposed at an existing campground that is zoned Open Space. The proposed campground site redevelopment and new amenities would not require the extension of new public roads and the utility infrastructure (i.e., electric, potable water and irrigation lines) would be sized to meet the needs of the project. As improvements to an existing campground, no population growth would occur, and the project would not induce substantial unplanned population growth in the area. **No impact** would occur.

b) The project site currently operates as an existing campground. Campground site redevelopment and new amenities would not result in the displacement of residents from existing housing or necessitate the construction of replacement housing elsewhere. **No impact** would occur.

SOURCE: County of San Diego PDS – Zoning and Property Information (County of San Diego 2025).

XV. Public Services

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XV.	PUBLIC SERVICES. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
a)	Fire protection?	☐	☐	☒	☐
b)	Police protection?	☐	☐	☒	☐
c)	Schools?	☐	☐	☐	☒
d)	Parks?	☐	☐	☒	☐
e)	Other public facilities?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a) Fire protection services to the project site would be provided by the Lakeside Fire Protection District (LFPD). The closest fire station to the project site is Fire Station #3, located approximately 0.75 miles southeast of the County recreational amenity site, at 14008 Highway 8 Business in El Cajon. Operation of the project would be consistent with existing recreational use of the campground but would introduce new recreational amenities at the campground with a small increase in the number of campground sites, including new cabins. The incremental demand for fire protection services associated with the increase in campground sites and new recreational amenities would not place a substantial demand on the LFPD that would increase emergency response times. Therefore, there would be no need for new or altered fire protection facilities or related infrastructure that could result in significant adverse physical impacts. **Less-than-significant** impacts would occur.

b) Police protection services in the project area are provided by the San Diego County Sheriff's Office. The Lakeside Sheriff's Substation is located at 12354 Parkside Street in Lakeside, approximately 1.7 miles west of the project site. The Lakeside Sheriff's Substation was opened in May 2015 to better serve the unincorporated community of Lakeside, portions of unincorporated El Cajon, the Barona Indian Reservation, and both campuses of the Grossmont-Cuyamaca Community College District (San Diego County Sheriff's Office 2025). Operation of the project would be consistent with existing recreational uses of the site, although an increase in campground sites and new recreational amenities would likely result in additional users present at the project site. The incremental demand for police protection services associated with the increase in campground sites and new recreational amenities would not place a substantial demand on the Sheriff's Department that would increase emergency response times or require new facilities. Therefore, there would be no need for

new or altered police protection facilities or related infrastructure that could result in significant adverse physical impacts. Impacts would be **less than significant**.

c) Operation of the campground would be consistent with existing recreational uses of the site but would introduce new recreational amenities and slightly increase the number of campground sites available. The project would not introduce a new permanent population to the area or include any residential uses. Therefore, there would not be a need for new school facilities, nor would there be an increase in demand on existing school facilities. **No impact** would occur.

d) The project would not increase the demand for park space but would potentially result in increased usage at the campground, due to a minor increase in the number of campground sites and the addition of several recreational amenities. Use of the project area would temporarily be restricted during construction. Once construction has been completed, the area would be accessible to the public, improving upon the existing recreational options available at Lake Jennings. The project would provide new recreational facilities at an existing recreational site but would not result in the need for new or altered facilities to accommodate users. Impacts related to parks would be **less than significant**.

e) Given the transient nature of campground stays, the project would not increase the population of the area, nor would it cause increased demand on other public facilities. The project would not require the construction of new or expanded public facilities, and **no impact** would occur.

SOURCE: Lakeside Fire Protection District website (LFPD 2025); San Diego County Sheriff's Office website (SDCSO 2025).

XVI. Recreation

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

Project Impacts and Mitigation Measures

a) Helix Water District owns and operates Lake Jennings reservoir, which includes 350 acres of recreational land for camping, fishing, boating, hiking and other recreational activities. The project involves the redevelopment of an existing campground and would add several new campground sites and recreational amenities, among other site improvements. The proposed improvements may incrementally increase park usage, but usage would be limited by campground site availability. The project does not include population-generating uses. Therefore, the increase in demand would be minor and would not lead to the substantial deterioration of existing neighborhood or regional parks. **Less-than-significant** impacts are identified.

b) The physical environmental impacts of constructing the proposed campground site redevelopment are discussed throughout this document and would be less than significant with mitigation incorporated. The project would not trigger the need for the construction or expansion of other recreational facilities. Thus, the project would not have a substantial adverse physical effect on the environment. Impacts would be **less than significant**.

SOURCE: N/A

XVII. Transportation

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XVII.TRANSPORTATION. Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curve or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) The project would be consistent with the County General Plan and zoning and would add several campsites and new recreational amenities to an existing lake park in the County. Based on the trip generation estimate conducted by LOS Engineering (2025), the project would generate 74 average daily trips (ADT), consisting of 56 ADT generated by the 14 additional campsites and 18 ADT associated with the County recreational amenity park.

Construction traffic associated with the project would be minimal and temporary, lasting approximately 12 months. Roadway improvements associated with the project would involve temporary lane closures along Bass Road and Bass Drive that would be managed through a traffic control plan. Once constructed, the project would result in a minor increase in daily trips that would not conflict with the County's General Plan Mobility Element. In addition, the project would not cause any changes to major roads, pedestrian linkages or bicycle facilities in the area as it would be constructed on private land owned by Helix Water District at the existing Lake Jennings campground and surrounding park lands. Therefore, the project would not conflict with any adopted programs, plans or policies related to the local circulation system, including those in the Mobility Element of the General Plan. **No impact** would occur.

b) Senate Bill 743 (SB 743) was signed into law on September 27, 2013 and changed the way that public agencies evaluate transportation impacts under CEQA. A key element of this law is the elimination of using auto delay, or level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The legislative intent of SB 743 was to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions." According to the law, "traffic congestion shall not be considered a significant impact on the environment" within a CEQA transportation analysis.

In response to SB 743, the Governor's Office of Planning and Research (OPR) updated the CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. Based on input from the public, public agencies, and various organizations, OPR recommended that Vehicle Miles Traveled (VMT) be the primary metric for evaluating transportation impacts under CEQA. VMT measures the number of vehicle trips generated and the length or distance of those trips.

Thus, CEQA Guidelines Section 15064.3, subdivision (b) provides criteria to evaluate a project's potential impact on transportation and traffic depending on the type of project. Section 15064.3(b) establishes VMT as the appropriate measure for transportation impacts and eliminates automobile delay (i.e., level of service) as appropriate for the determination of potentially significant transportation and traffic impacts. For projects that reduce or have no impact on VMT (meaning there is no increase in demand for additional trips to be generated), CEQA Guidelines Section 15064.3 suggests that these projects be concluded to cause a less than significant impact. Additionally, the Governor's Office of Land Use and Climate Innovation (previously OPR) technical advisory regarding transportation impacts indicates that small projects generating fewer than 110 trips per day can be assumed to cause a less than significant transportation impact (OPR 2018).

Helix Water District does not currently have adopted guidelines that govern the implementation of SB 743 and analysis of projects using a VMT metric. As CEQA Lead Agency, Helix Water District has chosen to adopt the state's technical advisory for the purposes of assessing the project's transportation impacts under CEQA. The proposed project would be consistent with the County General Plan designation of "Public Agency Lands" and "Open Space" zoning and the traffic attributable to the project would amount to the addition of 74 ADT (i.e., less than the small projects screening threshold). Therefore, the

project would not exceed the 110-daily trip threshold for small projects and is presumed to have a less-than-significant VMT traffic impact. The project would not result in a conflict with CEQA Guidelines Section 15064.3 subdivision (b). Impacts would be **less than significant**.

c) The campground portion of the project would be constructed within the existing campground property and would not require any modifications to access points or changes to off-site streets. The County recreational amenity site would relocate the existing driveway connection along Bass Road to a location slightly to the north along Bass Drive. The driveway design would comply with County road design standards. The project would not include incompatible uses of the site or surrounding areas. Therefore, no increase in hazards from project design features would occur, and **no impact** is identified.

d) See Item IX.f. From the above information and the proposed project design, potential impacts to emergency response or evacuation plans would be less than significant, based on the following considerations: (1) as described above, project traffic would not result in significant impacts to local roadways or intersections, with no associated effects to emergency response or evacuation plans; (2) project construction would involve temporary lane closures along Bass Road and Bass Drive that would be managed through a traffic control plan that would ensure no impacts to emergency response or evacuation plans; (3) no closures to regional and local roadways (including I-8 and Lake Jennings Park Road) from project-related traffic would occur; and (4) primary access to all major roadways from local properties would be maintained during construction and operation activities. Accordingly, impacts associated with emergency access would be **less than significant**.

SOURCES: Trip Generation and VMT Screening Assessment (LOS Engineering 2025); Office of Planning and Research Technical Advisory (OPR 2018).

XVIII. Tribal Cultural Resources

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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 section 5020.1(k), or	☐	☒	☐	☐
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) to Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Project Impacts and Mitigation Measures

a) No cultural resource sites were identified within the project area during the archaeological survey. A record search of the NAHC Sacred Lands File (SLF) was completed for the project by Spindrift Archaeological Consulting (ASM Affiliates 2025). The results were positive and indicated that the project area is within the ancestral territory and tribes should be contacted: the Barona Group of the Capitan Grande, the Ewiiaapaayp Band of Kumeyaay Indians, the Kwaaymii Laguna Band of Mission Indians, the Sycuan Band of the Kumeyaay Nation, and the Viejas Band of Kumeyaay Indians for more information (in addition to 15 other Tribal contacts). Although no tribal cultural resources have been identified within the project area, there is potential for unrecognized resources to be discovered during grading and utility trenching activities. **Mitigation Measure CUL-1** identified in Item V, above, would be implemented to ensure that potential impacts to tribal cultural resources would be **less than significant with mitigation incorporated**.

b) On April 4, 2025, in compliance with California Public Resources Code section 21080.3.1 (AB 52), the Helix Water District, as Lead Agency, sent a letter to the local tribes notifying them of the proposed project. During the AB 52 consultation period, ASM was contacted by the Tribal Historic Preservation Officer for the Manzanita Band of the Kumeyaay Nation. They expressed concerns that there may be subsurface cultural deposits that could be impacted by the proposed improvements and requested monitoring of all ground disturbing activities on the project and has requested Manzanita Band be involved in the monitoring

process. Therefore, it is assumed that project impacts to TCRs could occur. Construction monitoring by an archaeologist and Native American tribal representative would be implemented during project grading, in accordance with **Mitigation Measure CUL-1**, to address the inadvertent discovery of unknown buried archaeological resources or TCRs. **Less-than-significant impacts would occur with mitigation incorporated**. Refer to Item V.b for additional discussion.

SOURCES: Archaeological Survey for the Lake Jennings Campground Improvement Project (ASM Affiliates 2025).

XIX. Utilities and Service Systems

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

Project Impacts and Mitigation Measures

a) New utility hookups would connect to existing utility infrastructure at the project site, including water, sewer, electricity, and stormwater drainage. New connections for potable water service would connect to an existing 8-inch water line that is present in Bass Road and other 8-inch water lines that traverse the project site. The project also includes the

placement of permanent below-grade landscaping irrigation. New sewer hookups would connect to existing sewer infrastructure at the project site that is present along Bass Drive and connects to other areas of the campground. Project work on Bass Road would include removing a short segment of the existing 8-inch cast-iron sewer line present in Bass Road and replacing it with a new 8-inch polyvinyl chloride (PVC) pipeline. Electrical improvements include providing new pad mounted electrical pedestals at all existing, new, and reconfigured campsites; new site electrical distribution equipment; and new underground electrical distribution consisting of conduit and handhole infrastructure. Additionally, existing panelboards at campground restrooms, pavilion, office, laundry, and shop facilities would be re-fed from new electrical distribution equipment. Stormwater drainage systems and infrastructure would be installed to capture runoff from impervious services before discharge into the reservoir. Construction of the new utility connections would occur within the limits of work analyzed for the project. No additional significant environmental effects would occur, and **less-than-significant** impacts are identified.

b) Water service is provided to the project site by the Helix Water District. The project would result in an increased number of utility hookups at the project site, new irrigation, a new splash pad/pool (water play area), and drinking fountains. These new features would result in increased water usage at the project site during project operation. Additionally, a short-term increase in demand for water during construction would occur as a result of construction BMPs, such as watering the site to reduce fugitive dust. The temporary nature of the water required during construction and the relatively minor amount required during construction and operation would not create a considerable demand for water or new water services. Therefore, sufficient water supply would be available to construct and operate the project. Impacts would be **less than significant**.

c) Wastewater services are provided to the project site by San Diego County Sanitation District. The project includes the construction of new sewer connections, which would result in an increase in wastewater generation at the project site. However, the increase in wastewater generated by new utility hookups at a campground would not be expected to generate enough wastewater to impact wastewater service capacities or wastewater treatment system. Therefore, impacts would be **less than significant**.

d) During construction, the project would temporarily generate solid waste that would be collected and disposed of at a regional landfill. Demolition of camp sites, utility infrastructure, asphalt roads, curbs, concrete paving, retaining walls, fencing, lighting, railings, campsite markers, existing site furnishings, and existing vegetation would occur during the construction period, resulting in demolition debris. Construction debris would be sorted and disposed or recycled in accordance with federal, state, and local statutes related to solid waste. Operation of the project campground and recreational amenities would produce small amounts of solid waste by campground and other recreational users. Generation of waste at the project site already occurs at the existing campground; however, the project would result in a minor increase in campsites and recreational users due to new amenities. Collection bins would be sited on the project site to ensure all waste is properly disposed of. The project's incremental demand for waste disposal would not contribute to a substantial increase in waste disposal beyond the existing permitted regional landfill capacity. As discussed below in Item XIX.d, construction activities and operations associated with the project would be required to comply with state and local standards related to solid

waste, including applicable requirements for diversion of construction and demolition debris to reduce waste deposited at the landfill, the California Integrated Waste Management Act, and the County's solid waste reduction programs. As such, impacts would be **less than significant**.

e) The project would continue to implement the County's solid waste reduction programs, which are designed to comply with federal, state, and local statutes and regulations related to solid waste. These statues and regulations include the California Integrated Waste Management Act and the County's solid waste disposal policies and practices. Associated impacts would be **less than significant**.

SOURCE: Water and Sewer Utility Plan (Nasland Engineering 2025c) Grading and Drainage Plan (Nasland Engineering 2025d); Overall Electrical Site Plan (Randall Lamb 2025).

XX. Wildfire

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

Project Impacts and Mitigation Measures

a) Refer to Item IX.f. There would be **less-than-significant** impacts to emergency response or evacuation plans.

b) The project site is located within a Very High Fire Hazard Severity Zone (CALFIRE 2025). Campfires are only permitted within designated fire rings in the existing condition and the

same restrictions would apply following construction of the campground site redevelopment. The proposed project would not involve the placement of new structures intended for long-term occupation but rather campsites (which already exist at the site) and new cabins intended for short-term stays. Structures would be constructed consistent with requirements governing fire safety, including the 2022 California Fire Code and County of San Diego 2023 Consolidated Fire Code. HWD would continue to implement brush clearance to reduce the fuel load surrounding the campground. In addition, the District is in the process of having the adjacent loop road connection between the campground and the existing access road along the northern shoreline paved to facilitate emergency access. Conformance with current fire codes would ensure that wildfire risks within the project area would not be exacerbated as a result of the project. Accordingly, there are no factors that would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be **less than significant**.

c) The project involves the construction and operation of campground site upgrades at an existing campground and the addition of recreational amenities. While the project includes the provision of new utilities hookups to existing and new campsites, electricity is already provided at the campground. Electricity would be extended to individual campsites where none currently exists and to the new campsites. All new electrical hookups would be installed underground from existing connections within the campground.; no new overhead lines are proposed. Additionally, wi-fi antenna poles and wiring would be installed to provide wireless service. The proposed project would not install electrical infrastructure that may exacerbate fire risk. A **less-than-significant** impact would occur.

d) The majority of the project site is situated atop a ridgeline with slopes that trend steeply downward away from the campground area. The County recreational amenity site is located at a lower grade than adjacent open space and residential uses to the south, and upslope from the nearby Lake Jennings Park Road and the WTP to the west. Stormwater drainage systems and infrastructure would be installed to capture runoff from impervious services before discharge into the reservoir. Compliance with drainage and erosion control requirements, as discussed in Item VII.b and X.c would ensure proper drainage and flood control under post-fire conditions. The risk to people and structures from downslope or downstream flooding or landslides resulting from runoff, post-fire slope instability, or drainage changes would be negligible. Impacts would be **less than significant**.

SOURCES: Fire Hazard Severity Zone Viewer (CALFIRE 2025); County of San Diego 2023 Consolidated Fire Code (County of San Diego 2023).

XXI. Mandatory Findings of Significance

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion

The following are Mandatory Findings of Significance in accordance with CEQA Guidelines section 15065.

a) Potentially significant impacts to the environment resulting from the project have been identified for the areas of biological resources and cultural resources (including tribal cultural resources). With the incorporation of Mitigation Measures BIO-1 through BIO-4, the project would reduce potential impacts to biological resources to below a level of significance.

The project is not expected to impact resources related to major periods of California history or prehistory. Based on the presence of cultural resources in the vicinity of the project area, however, the project would have the potential to impact unknown subsurface cultural resources during ground-disturbing construction activities. With implementation of Mitigation Measures CUL-1 and CUL-2, impacts to unknown subsurface cultural resources and human remains would be reduced to below a level of significance.

With implementation of the mitigation measures identified for biological and cultural resources described in this Initial Study Environmental Checklist, the project would not have the potential to degrade the quality of the environment for sensitive or special-status plant or animal communities, 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. Impacts would be **less than significant with mitigation incorporated**.

b) As documented in this Initial Study Environmental Checklist, the project would result in **less-than-significant impacts with mitigation incorporated** for biological resources, cultural resources (including tribal cultural resources) and land use. All other impacts would be either less than significant or no impact. Mitigation would be required to reduce the project's impacts to less than significant, which would also ensure the project would not contribute to cumulative impacts. As such, the project would not contribute to potentially significant cumulatively considerable impact on the environment

c) As discussed in this Initial Study Environmental Checklist, no hazardous conditions exist on the project site or in the surrounding area. It is not anticipated that construction activities would create conditions that would significantly directly or indirectly impact human beings. Any hazardous materials used at the site or removed from the site as part of the construction process would be handled in accordance with applicable regulations for the transport, use, storage, and disposal of such materials, ensuring that no substantial adverse effect on human beings would occur. As described in this Initial Study Environmental Checklist, the project would not result in significant long-term impacts associated with air quality, geology, hazards or hazardous materials, hydrology/water quality, or noise, and as such, would not result in an adverse effect on human beings, either directly or indirectly. Impacts would be **less than significant**.

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4. PREPARERS

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