JESMOND DENE (JOHN MASSON MEMORIAL) BIKE PARK
DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

City Project No. PPL25-0111

Prepared for:

City of Escondido
Planning Division
201 North Broadway
Escondido, CA 92025

Prepared by:

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

October 2025

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Planning Division
201 North Broadway
Escondido, CA 92025-2798
(760) 839-4671
www.escondido.org

DRAFT MITIGATED NEGATIVE DECLARATION

Jesmond Dene (John Masson Memorial) Bike Park Project

City Project No. PPL25-0111

An Environmental Initial Study Checklist 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 City of Escondido to assess this project as required by the California Environmental Quality Act (CEQA) and state CEQA Guidelines, as well as related City Ordinances and Regulations, including Escondido Municipal Code, Zoning Code Article 47.

This MND assesses the environmental effects of the proposed Jesmond Dene (John Masson Memorial) Bike Park Project (project) located at 2401 N. Broadway, Escondido, CA 92025 (Assessor's Parcel Numbers 187-310-09-00 and 187-310-11-00). The approximately 4.6-acre project site is located within the approximately 40-acre Jesmond Dene Park situated at the southwest corner of North Broadway and Jesmond Dene Road. The project proposes to create a progression-based bike park on an undeveloped portion of parkland that is informally used by the community for off-road recreational bike activities. The resulting bike park would be divided into three tracks, including a pump and jump track, a skill track, and a kids track. The bike park would also include viewing areas and an improved multi-use trail that connects to an existing trail around a portion of the project site. The facility would be available for daytime use only; no overhead or wayfinding lighting is proposed.

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 **October 23, 2025**, and end on **November 24, 2025**. Written comments on the Draft IS/MND should be submitted to the following address by 5 p.m., on **November 24, 2025**.

City of Escondido Planning Division
201 North Broadway
Escondido, CA 92025-2798

Contact: Oscar Romero, Principal Planner
Telephone: 760-839-4801
Email: Oscar.Romero@escondido.gov

All comments received will be considered with the Final IS/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 City of Escondido Planning Division at the address shown above, and also available on the City's website at https://www.escondido.gov/246/Active-Development-Projects. The City of Escondido General Plan Update (2012); Final Environmental Impact Report (2012); and Climate Action Plan (2021) are incorporated by reference in this document, pursuant to state CEQA Guidelines section 15150 and can be found on the City's website at https://www.escondido.gov/1106.

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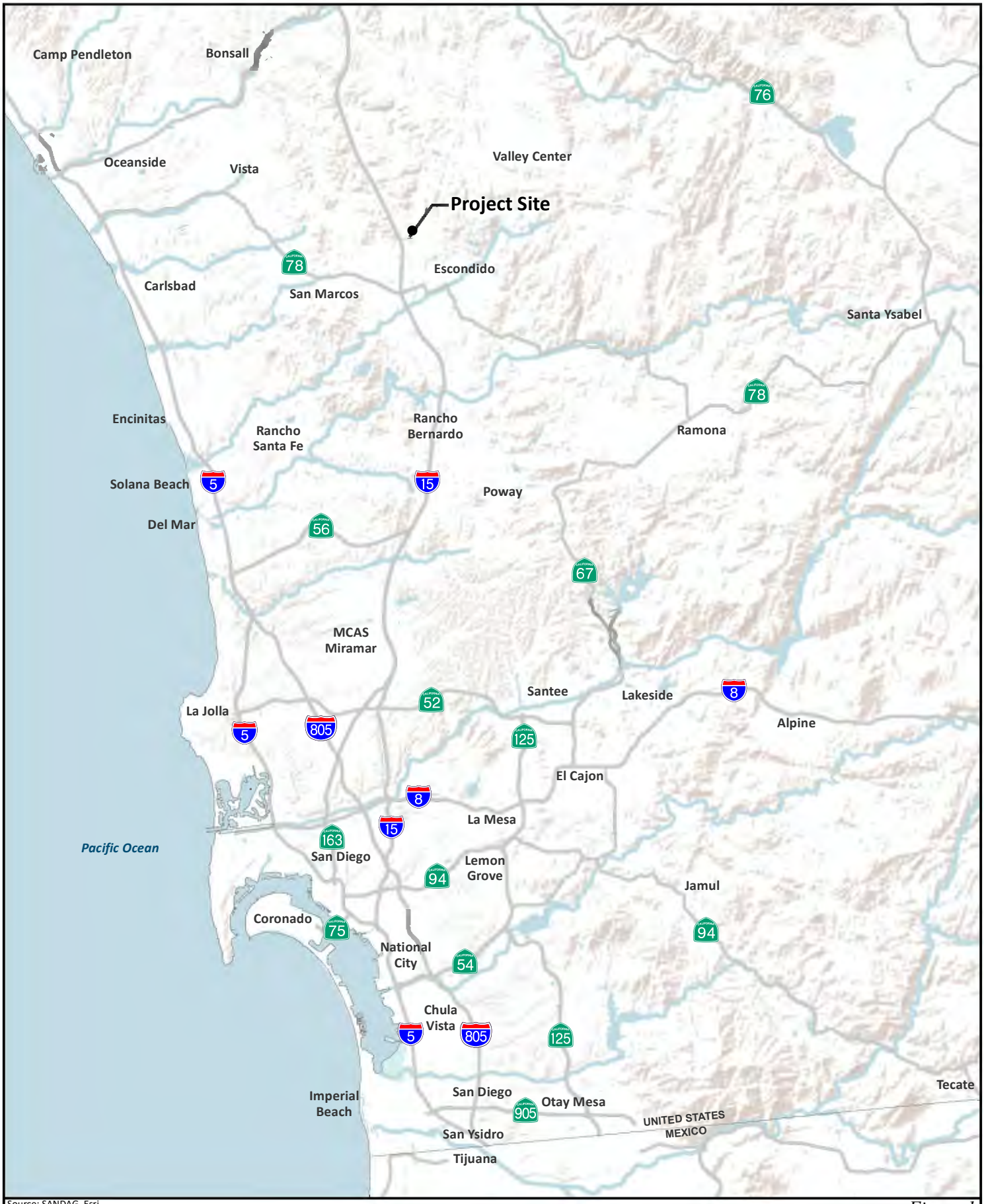
1. INTRODUCTION

1.1 Environmental Checklist Form

1. **Project Title:** Jesmond Dene (John Masson Memorial) Bike Park Project, City Project No. PPL25-0111
2. **Lead Agency Name and Address:** City of Escondido
   201 North Broadway, Escondido, CA 92025
3. **Contact Person and Phone Number:** Oscar Romero, Principal Planner
   760.839.4801 | Oscar.Romero@escondido.gov
4. **Project Location:** 2401 N. Broadway, Escondido, California 92025
5. **General Plan Designation:** Public Lands/Open Space
6. **Zoning:** Open Space/Parks (OS)
7. **Description of Project:**

The John Masson Bike Park project site is approximately 4.6 acres and located within the 40-acre Jesmond Dene Park situated at the southwest corner of North Broadway and Jesmond Dene Road (**Figure 1**, *Regional Location*, and **Figure 2**, *Aerial Photograph*). The project proposes to create a progression-based bike park on an undeveloped portion of parkland that is informally used by the community for off-road recreational bike activities (**Figure 3**, *Improvement Plan*). The resulting bike park would include a pump and jump track, a skill track, and a kids track. The bike park would also include viewing areas benches, and a multi-use trail around a portion of the bike park perimeter. The proposed bike park would provide a safe, designated place for users to practice and develop their bike skills. As the project site is currently used informally for off-road recreational bike activities, it is anticipated that informal users already using the park for these activities would utilize the bike park, along with a minor increase in users once the developed bike park is completed. These users may already be utilizing the park for other recreational purposes. Unique, new users would not constitute a large increase in park usage. The design for the proposed bike park is based on input from various community stakeholders, including City staff, park users, and local community. The bike park would be constructed with high-quality materials to minimize maintenance and ensure durability and longevity. The facility would be for daytime use only; no overhead or wayfinding lighting is proposed.

Project construction is anticipated to begin in Winter 2026 with site preparation. Construction of the project is expected to occur over a period of four months and is anticipated to be completed around Fall 2026. Construction activities include demolition, grading, paving and landscaping. Grading quantities consist of the import of 2,255 cubic yards of fill to construct jumps and berms. 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, dump trucks, equipment trucks, air compressors, hydraulic pumps, asphalt boom pump trucks, and asphalt/concrete delivery trucks.



Source: SANDAG, Esri

Figure 1

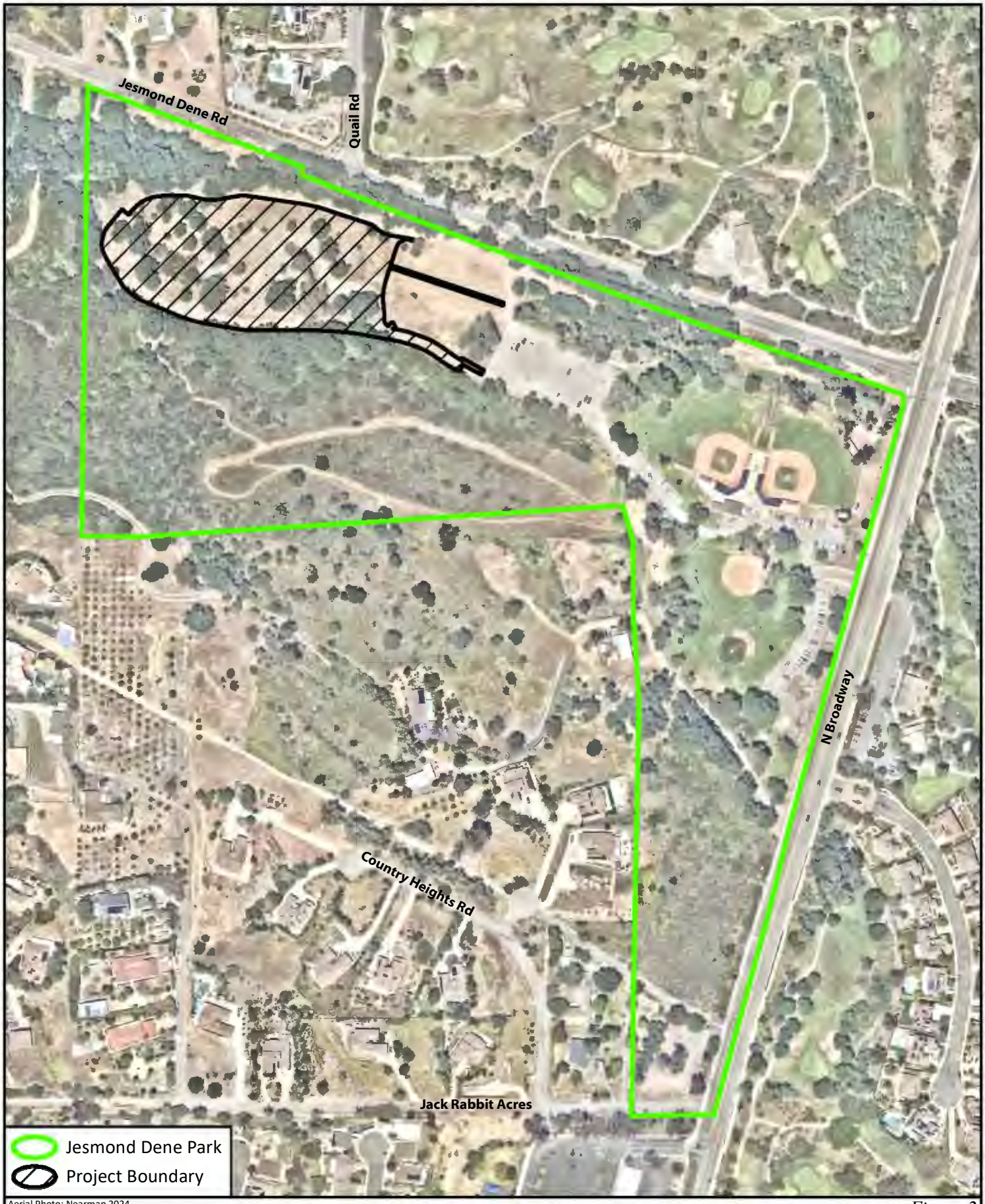
Regional Location

JESMOND DENE (JOHN MASSON MEMORIAL) BIKE PARK

BARANEK Consulting Group

N

0 6 Miles



Aerial Photo: Nearmap 2024

Figure 2

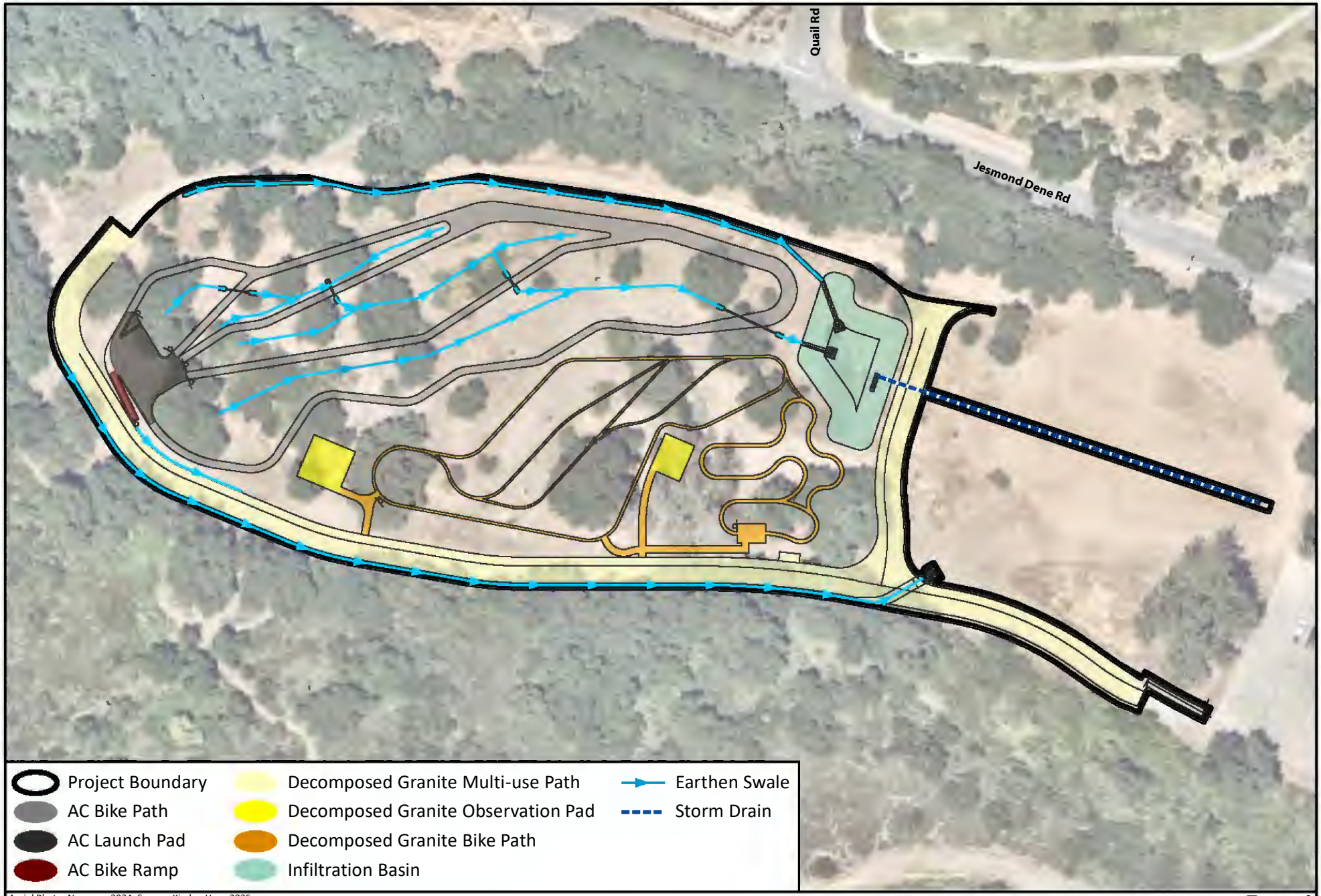
Aerial Photograph

JESMOND DENE (JOHN MASSON MEMORIAL) BIKE PARK

BARANEK Consulting Group

N

0 300 Feet



Aerial Photo: Nearmap 2024; Source: Kimley-Horn 2025

BARANEK Consulting Group

N

0 100 Feet

Figure 3

Improvement Plan

JESMOND DENE (JOHN MASSON MEMORIAL) BIKE PARK

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

The 4.6-acre project site is located within the approximately 40-acre Jesmond Dene Park in the northern portion of the City of Escondido within San Diego County (County). Jesmond Dene Park is situated at the southwest corner of North Broadway and Jesmond Dene Road (see Figure 2). Regional access to the park is provided by I-15, which runs in a north–south direction approximately 0.75 miles west of the project area.

Approximately 16 acres of the 40-acre Jesmond Dene Park is developed for active recreational use, including three ballfields with MUSCO LED lights; a tot lot/playground; concession stand; restrooms; picnic/BBQ area; and parking lots. The balance of the park is undeveloped and/or features open space with hiking trails. The portion of the park proposed for bike park improvements is currently heavily disturbed by human activity but undeveloped. The area immediately surrounding the project site contains undeveloped open space and hiking/biking trails. Six vegetation communities were mapped within the project site including Diegan coastal sage scrub, coast live oak woodland, disturbed southern sycamore-alder riparian woodland, disturbed coast live oak woodland, disturbed northern coyote brush scrub, and disturbed land. Adjacent to the project site, within the 100-foot buffer around the project site, additional vegetation communities, including developed land and southern cottonwood willow riparian forest are present. Approximately 2.7 acres of the 4-acre project site consists of disturbed land. A stormwater conveyance channel is situated immediately north of the project site parallel and adjacent to Jesmond Dene Road. The elevation in the project area ranges from approximately 640 to 650 feet above mean sea level (AMSL). Reidy Creek is located approximately 0.3 miles to the east of the project area and Escondido Creek is located approximately 3 miles to the south. The project site is situated within the 7.5-minute U.S. Geological Survey (USGS) Escondido quadrangle.

The areas surrounding the park are primarily developed with residential, recreational and institutional uses. Adjacent land uses include residential development to the south, west, north and northeast; the Reidy Creek golf course to the north and east; Reidy Creek Elementary School to the north and North Broadway School to the south along North Broadway. The Vista Flume, which distributes treated water from Escondido-Vista Water Treatment Plant, runs generally from the west to east through residential neighborhoods south of the park and distributes treated potable water to the service areas in Vista and Escondido.

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 Storm Water 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). No other permits from other public agencies are required to implement the project.

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, the City sent notification to Native American Tribes traditionally and culturally affiliated with the project area on November 21, 2024. See Section XVIII of the Initial Study Environmental Checklist for more detail on the four responses that were received from local tribal representatives and action taken per consultation. 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:

Oscar Romero	Principal Planner
Name	Title
Oscar Romero	10/22/25
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.

Earlier Analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

a. Earlier Analysis Used. Identify and state where it is available for review.
b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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 would construct a bike park amenity at an existing City park. The project site is in a topographic level area of the park and surrounded by mature trees, hillside open space and recreational facilities. The project site would not affect a ridgeline or hillside. Site improvements would occur in a disturbed and undeveloped portion of the park and be directly visible from trails within the Jesmond Dene Park open space and other park use areas. The bike park improvements would augment the existing recreational amenities visible from the trails and not degrade the quality of views afforded from the park open space. The project site would be indirectly visible through mature trees that parallel the travel lanes of Jesmond Dene Road. Because of project site's location beyond the line-of-sight and intervening recreational facilities and mature landscaping, the site would not be visible from the travel lanes of North Broadway. Neither road in the project area is designated a scenic corridor in the City General Plan. According to Visual Resources Policy 3.6 in the Resource Conservation Element of the City's General Plan, the closest scenic corridor to the site is I-15, which is over 0.75 miles west of the park. Therefore, the project would not adversely impact views from scenic vistas in the City of Escondido, and **no impact** would occur.

b) The only officially designated State Scenic Highway within its boundaries is Interstate 15 (I-15) (City of Escondido 2012). The Resource Conservation Element of the General Plan states that I-15 scenic corridor is defined as the area within 1,750 feet of the freeway. The park site is situated 0.75 miles east of I-15 and beyond the scenic corridor defined for the highway. The project is a heavily disturbed site that does not contain regionally significant trees, rock outcroppings, and historic buildings that would be affected by the project or visible from the scenic portion of the highway. Therefore, the project would have **no impact** to scenic resources along the designated portion of the highway.

c) The project consists of adding a recreational amenity to an existing park located in a developed area of the City. Applicable policies governing scenic quality in the City's General Plan protect existing views of scenic resources, such as hillsides, ridgelines, hilltops, rock outcroppings, creeks, lakes, natural open space areas and floodways. The project site is in a topographically level area of the park and surrounded by mature trees, hillside open space and recreational facilities. The project site would not affect a ridgeline or hillside or other scenic resources recognized in the General Plan policies. The bike park improvements would augment the existing recreational amenities visible from the trails and not degrade the quality of views afforded from the park open space. Although one tree would be relocated, the majority of existing mature trees would be retained on site with the bike park amenities construction around and beneath the tree canopies, in accordance with the Escondido Municipal Code Grading and Erosion Control Ordinance (Chapter 33, Article 55, Sections 33-1068 and 33-1069), which places restrictions on the removal of vegetation and includes vegetation and replacement standards for impacts to mature and/or protected trees. Native hydroseeding would be used to stabilize the site. The existing surrounding trees and open space that limit views toward the bike park would be retained in place. Therefore, the project would not conflict with applicable policies protecting scenic quality and a **less-than-significant** impact would occur.

d) The project does not propose any security, wayfinding or entry monumentation lighting. Construction of the project would occur during the day when no lighting would be needed. Should it be determined that temporary construction lighting is needed, lighting would comply with the Escondido Outdoor Lighting Ordinance (Escondido Municipal Code Chapter 33, Article 35), which is intended to minimize glare, light, and artificial sky glow for the benefit of the community, as well as astronomical research at Palomar Observatory. Temporary lighting would be required to be shielded and oriented downward to minimize light spill. Therefore, the bike park improvements would not create new sources of night lighting or glare from light sources, and **no impact** would occur.

SOURCES: Escondido General Plan Resource Conservation Element (City of Escondido 2012a); Escondido Municipal Code (City of Escondido 2024a).

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 complied 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 Resources Agency (2024), the project site and its immediate surroundings are designated as "Urban Built-Up 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 planned for and used as a park. The project would not convert agricultural land to a non-agricultural use. **No impact** would occur.

b–c) The project site is not located within a Williamson Act Agricultural Preserve, nor is it zoned for agricultural use. **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 a recreational amenity in a developed park that is planned for recreational use. There are no agricultural uses or forest land uses on-site or within the near 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: Land Use Map of the Escondido General Plan (City of Escondido 2012a); Farmland Mapping and Monitoring Program (California Department of Conservation 2024).

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 Associated of Governments (SANDAG) and land use plans developed by the cities and by the County. As such, projects that propose growth consistent with City 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 Land/Open Space use in the General Plan. The proposed project is a recreational amenity proposed at an existing park 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. Impacts would be **less than significant**.

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 (PM10), particulate matter smaller than or equal to 2.5 microns in diameter (PM2.5), 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 pollutant short-term, temporary emissions during construction and during long-term operations. The project does not propose habitable structures and is consistent with the site's General Plan land use designation. Temporary emissions would be generated by construction equipment used for site preparation, grading, paving and landscaping activities. 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 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 rules of the SDAPCD and the regulations of the Escondido Municipal Code Grading and Erosion Control Ordinance (Chapter 33, Article 55, Sections 33-1068 and 33-1069) 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. The minor construction activities associated with constructing the bike park would not be expected to exceed SDAPCD thresholds or Escondido Municipal Code Chapter 33, Article 47, referred to as the Environmental Quality Regulations (EQR), and **less-than-significant** impacts would occur.

Operational air pollutant emissions would be primarily associated with mobile sources produced by any new park users accessing the bike park. Limited energy source emissions would be produced by the power required to run the new irrigation system. The project's operational pollutant emissions would be minor and incremental given that existing park

users may use the bike park amenity and the amount of new bike park users would be limited by the existing parking supply at the park. Long-term operational emissions associated with the project would be **less than significant**.

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 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. Although some of the construction equipment would emit diesel emissions, much of the construction work would be completed by hand, thus minimizing the temporary construction-phase emissions. All construction emissions would cease once the 4-month construction phase is complete. No operational TACs would be produced by the project because of its recreational nature and lack of new permanent stationary sources that could lead to unhealthful emissions. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations during construction or operations, 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 residential development 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); Escondido Municipal Code (City of Escondido 2024a).

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?	☐	☒	☐	☐

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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) A Biological Technical Report (BTR; Appendix A) was prepared for the project by Rocks Biological Consulting (2025). The following discussion is based on the project's BTR; additional details are contained in Appendix A.

Listed Plant Species. No federally or state listed as endangered or threatened plant species were observed on the project site during the general biological survey or focused rare plant surveys, and none have moderate to high potential to occur based on a lack of suitable habitat. Four special-status plant species that have a moderate potential to occur on the project site, including California adolphia, decumbent goldenbush, delicate clarkia, and summer holly, were not observed on site during focused rare plant surveys conducted in April, May, and June 2025. No significant direct impacts on federally or state-listed endangered or threatened plant species are anticipated with project implementation. To avoid potentially significant indirect impacts related to inadvertent disturbance to areas outside the limits of the proposed project activities, the construction best management practices (BMPs) outlined in **Mitigation Measure BIO-1** would be implemented to reduce potentially significant impacts to special-status plants to **less than significant with mitigation incorporated**.

Listed Wildlife Species. No federally or state threatened or endangered wildlife species were observed on the project site. However, the project site occurs within USFWS critical habitat for coastal California gnatcatcher, a federally listed threatened species and a state species of special concern, which has been recorded within the vicinity of the project site. Isolated patches of California sagebrush (purple sage) scrub and disturbed coyote brush scrub are

present on the project site and have a moderate-to-high potential to support coastal California gnatcatcher. A United States Fish and Wildlife Service (USFWS) protocol presence/absence survey for coastal California gnatcatcher was conducted at the project site, consisting of six visits between May 17 and June 25 (HELIX 2024; refer to BTR Appendix E, which is attached to Appendix A to this document). The coastal California gnatcatcher was not detected on site or within a 300-foot radius of the site during the 2024 survey effort and is presumed to be absent. Implementation of **Mitigation Measure BIO-2**, which requires pre-construction surveys and biological monitoring (if construction is proposed during the breeding season February to August) to verify absence of the coastal California gnatcatcher in adjacent habitat, would reduce potentially significant impacts to a less-than-significant level. Should coastal California gnatcatcher be observed within 300 feet of the construction site during pre-construction surveys, **Mitigation Measure BIO-2** also contains noise monitoring and noise attenuation steps to be taken to mitigate indirect impacts to a **less-than-significant level with mitigation incorporated**.

Crotch's bumble bee is currently a candidate for listing under the California Endangered Species Act (CESA) based on a 2018 listing petition. Crotch's bumble bee has been recorded within seven miles of the project site near the Double Peak Regional Park in 2020 and within eight miles of the project site near the San Dieguito River in 2020 (CDFW 2025). Due to the presence of scrub habitat and nectar sources appropriate for Crotch's bumble bee within habitat adjacent to the project site, focused surveys were conducted between April 30 and June 26, 2025. (refer to BTR Appendix F, which is attached to Appendix A to this document) No Crotch's bumble bee individuals were documented within the project site or a 50-foot buffer during focused surveys. Therefore, impacts to the species would be **less than significant**.

Least Bell's vireo, a federally and state-listed as endangered species, was not observed during the general biological survey conducted in September 2023; however, the species has been documented within 1 mile of the project site. Suitable nesting and foraging habitat do not occur on site but occurs 70 feet west of the project site within Goodding's willow-red willow riparian woodland and forest mapped within the survey area. Therefore, there is a low to moderate potential for the species to occur in the project area. As such, direct impacts on least Bell's vireo would not occur with project implementation. Indirect impacts on nesting least Bell's vireo, if present in the off-site habitat, could occur through harassment in the form of noise disturbance should construction occur during the species' breeding season. Such impacts are potentially significant; however, with the implementation of **Mitigation Measure BIO-3**, which requires pre-construction surveys (if construction is proposed during the breeding season) or assumed presence of the species, sound monitoring, and/or noise attenuation measures, impacts would be reduced to a **less-than-significant level with mitigation incorporated**.

Non-listed Special-Status Species. Three non-listed special-status species, coastal whiptail, oak titmouse and wrentit, were observed or heard calling within the project study area during general biological surveys. Seven additional species have a high, moderate-to-high, moderate, or low-to-moderate potential to occur on the project site but were not observed during general biological surveys, including big free-tailed bat, coast horned lizard, Cooper's hawk, orange-throated whiptail, red diamond rattlesnake, Southern California legless lizard, and western yellow bat.

Reptile Species. Direct impacts on coastal whiptail, orange-throated whiptail, coast horned lizard, red-diamond rattlesnake, and Southern California legless lizard (collectively addressed as non-listed special-status reptiles herein) could occur during project construction through harassment, injury, and/or death. These reptiles use camouflage as their primary defense, seek refuge in burrows or beneath leaf litter, and may not flush when startled, making them more likely to be crushed by construction vehicles than other species. With the implementation of **Mitigation Measures BIO-1 and BIO-4**, which require worker environmental awareness training; monitoring and pre-construction sweeps; and relocation, project impacts to non-listed special-status reptiles would be **less than significant with mitigation incorporated**.

Bat Species. Big free-tailed bat was not observed on-site but has a low-to-moderate potential to occur on the project site based on the presence of coast live oak woodland and forest, disturbed California sycamore-coast live oak riparian woodlands, and disturbed coast live oak woodland and forest. Western yellow bat has a moderate potential to occur on the project site based on the Goodding's willow-red willow riparian woodland west of the project site and on-site California sycamore-coast live oak riparian woodlands. Big free-tailed bat prefers to roost in rocky crevices but may occasionally roost in trees whereas western yellow bat is an obligate tree rooster. Woodland and forest vegetation communities on and near the project site would not be impacted and roosting sites would not be removed. However, construction noise or vibrations and other human activity may lead to roost abandonment, resulting in a potentially significant impact. Impacts would be reduced to a less-than-significant level through implementation of **Mitigation Measure BIO-5**, which requires a pre-construction bat survey (and a construction buffer if a maternal roost is located). Impacts to non-listed special-status bat species would be **less than significant with mitigation incorporated**.

Avian Species. Cooper's hawk has high potential to occur on the project site due to the presence of highly suitable foraging and moderately suitable nesting habitat in coast live oak woodland and forests, disturbed California sycamore-coast live oak riparian woodlands, and disturbed coast live oak woodlands on and adjacent to the project site. The project would not result in the permanent destruction of on-site woodlands; therefore, Cooper's hawk foraging habitat would not be impacted with project implementation. Oak titmouse and wrentit were observed within the survey area during biological surveys; however, the project site has low suitability to support these species, and the project would not result in the destruction of suitable habitat for oak titmouse and wrentit. Significant direct impacts on adult Cooper's hawk, oak titmouse, and wrentit are unlikely, as adult avian species would likely flush from the project site at the onset of construction activities, if present. Project construction activities (i.e., vegetation trimming) could result in direct impacts on Cooper's hawk in the form of harassment, injury, death, destruction and/or damage if active nests are present within the project site during those activities. Indirect impacts on Cooper's hawk, oak titmouse, and/or wrentit may occur in the form of elevated construction noise levels. Excessive noise levels generated during construction activities could elevate stress levels of nesting birds and impair normal vocal communication between the mated pair and their young, which can result in reduced parental care, increased risk of nest abandonment, and decreased perception of alarm calls that signal the presence of predators. Indirect impacts on nesting Cooper's hawk, oak titmouse, wrentit and general avian species, would be considered potentially significant, if present on site. Implementation of **Mitigation Measure**

BIO-6 requires construction activities to occur outside of the typical avian breeding season and pre-construction surveys for nesting birds be conducted prior to construction. If active nests are documented, **Mitigation Measure BIO-6** also requires the establishment of non-disturbance buffers to be maintained around each nest until fledglings are no longer dependent on the nest and disperse from the area or a biologist verifies through non-invasive methods that the nest is no longer active. Impacts to avian species would be **less than significant with mitigation incorporated**.

Nesting Birds. The project has the potential to impact active bird nests if vegetation is removed or ground disturbing activities are initiated during the nesting season. Coast live oak woodland and forests, disturbed California sycamore-coast live oak riparian woodlands, disturbed coast live oak woodlands, California sagebrush (purple sage) scrub, and disturbed coyote bush scrub vegetation communities and disturbed land on the project site have the potential to support avian nests and impacts on nesting birds are prohibited by the Migratory Bird Treaty Act (MBTA) and/or California Fish and Game Code (CFGC) Sections 3503 and 3513. Implementation of **Mitigation Measure BIO-6**, which requires construction to occur outside of the bird nesting season and requires pre-construction surveys for nesting birds within three days prior to any site disturbance, would reduce potential impacts nesting birds to a less-than-significant level. Therefore, impacts on nesting birds would be **less than significant with mitigation incorporated**.

b) The project site contains 1.65 acres of disturbed native habitats (i.e., 0.51 acres of disturbed southern sycamore-alder riparian woodland, 0.86 acres of disturbed coast live oak woodland, and 0.28 acres of disturbed northern coyote brush scrub), 0.10 acre of undisturbed native habitat, and 2.63 acres of disturbed land. Woodland vegetation communities on the project site (i.e., coast live oak woodland and forests, disturbed California sycamore-coast live oak riparian woodlands, and disturbed coast live oak woodlands) would not be directly impacted by the project. Less than 0.28 acres of disturbed coyote bush scrub would be directly impacted by project implementation; however, this vegetation community is not considered sensitive by CDFW. The project would not result in direct impacts on sensitive vegetation communities. However, sensitive vegetation communities exist in the project area and could be impacted indirectly if project work limits were not maintained or construction activities were to enter leading to inadvertent disturbance. The construction BMPS outlined in **Mitigation Measure BIO-1** would be implemented to reduce potentially significant impacts to sensitive vegetation communities outside the limits of work to **less than significant with mitigation incorporated**.

c) The project site does not contain jurisdictional aquatic resources (refer to BTR Figure 5). One potentially jurisdictional aquatic resource associated with an off-site stormwater conveyance channel is present north of the project impact footprint and would be avoided. Therefore, no modification or fill to the jurisdictional aquatic resources is proposed. **Mitigation Measure BIO-1** requires a project biologist to monitor construction activities and prevent inadvertent disturbance to areas outside of the limits of work, including demarcation of project disturbance limits. In addition, **Mitigation Measure BIO-7** requires the installation of flagging and/or fencing to clearly mark the project limits/boundaries; hauling away of vegetation; and storage of construction equipment outside the potential jurisdictional areas. Implementation of these measures would ensure that potential indirect effects to jurisdictional areas would be avoided and considered **less than significant with mitigation incorporated**.

d) The project site does not function as part of a regional or local wildlife corridor; the site is isolated from large blocks of natural habitat and is relatively disturbed by surrounding anthropogenic land uses. The CDFW categorizes the project site as Rank 1, "Limited Connectivity Opportunity," which is the lowest rank within the Terrestrial Connectivity, Area of Conservation Emphasis dataset (CDFW 2024b). Thus, the project site does not serve as a regional or local wildlife corridor, and the project would result in **no impact** on wildlife movement and corridors.

e) Given that the City of Escondido does not have any agency-specific biological regulations, the project site is not subject to local regulations or ordinances protecting biological resources; therefore, the project would not conflict with polices or ordinances protecting biological resources. **No impact** would occur.

f) The City of Escondido is not actively participating in the local Habitat Conservation Plans or Natural Community Conservation Plans but does have a draft Subarea Plan. As such, the project would not conflict with any local, regional, or state habitat conservation plans and would obtain any necessary approvals for project impacts on sensitive species, as described under response IV.a. **No impact** would occur.

Mitigation Measures

BIO-1: Best Management Practices. To avoid significant impacts to special-status species and inadvertent disturbance to areas outside the limits of work established for the project, the following monitoring requirements and BMPs shall be implemented under the oversight of a qualified biologist:

1. 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.
2. Construction activities shall occur during daytime hours.
3. 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.
4. At the end of each workday during construction, all excavated, steep-sided holes or trenches more than eight inches deep and that have sidewalls steeper than 1:1 (45-degree) slope shall be covered 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 qualified biologist shall thoroughly inspect holes and trenches for trapped animals during biological monitoring.
5. All construction pipe, culverts, or similar structures with a diameter of 3 inches or greater that are stored on site overnight shall be screened, covered, or elevated at least 1 foot

above ground. These pipes, culverts, and similar structures shall be inspected by the qualified biologist for wildlife before such material is moved, buried, or capped.

6. 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.
7. 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.
8. All construction equipment shall be inspected for non-native seeds to avoid the spread of noxious invasives within and around the project site.

BIO-2: Coastal California Gnatcatcher. To reduce potentially significant impacts to this species to less than significant, the following avoidance and minimization measures are required:

1. *Pre-construction Surveys for Construction Activities Initiated by June 25, 2026 (i.e., less than two years since protocol surveys* [USFWS 1997]*):* A single pre-construction survey shall be conducted by a 10(a)(1)(A) permitted biologist within the project site and a 500-foot buffer to confirm that the coastal California gnatcatcher is absent. The survey shall be conducted no more seven (7) days prior to the start of project activities. If the pre-construction survey is negative, no further actions are required. If the survey is positive, measures 2a through 2d below shall apply.

2. *Pre-construction Surveys for Construction Activities Initiated after June 25, 2026:* A protocol survey in accordance *Coastal California Gnatcatcher Presence/Absence Survey Protocol* (USFWS 1997) shall be conducted on the project site and within a 500-foot buffer. If the protocol surveys are negative, no further actions are required. If surveys are positive, the following measures shall apply.

    a. If the pre-construction or protocol survey is positive for coastal California gnatcatcher on the project site, the City shall consult with the USFWS to obtain permits and/or clearances for the project impacts on habitat occupied by coastal California gnatcatcher. The City shall comply with all permit requirements, including compensatory mitigation through on-site mitigation, off-site mitigation, mitigation bank credit purchase, or a combination of these options, to offset permanent and temporary impacts on coastal California gnatcatcher occupied habitat.

    b. If the pre-construction or protocol survey is positive for coastal California gnatcatcher outside the project site but in appropriate habitat located within 500 feet of the site AND project construction activities are to be conducted outside the nesting season (i.e., September 1–February 14), no further actions are required.

    c. If the pre-construction or protocol survey is negative for the coastal California gnatcatcher on the project site but positive within 500 feet of the project site AND any project construction activities are to be conducted within the nesting season (February 14–August 31), the following measures shall be followed:

        i. *Biological Monitoring:* A qualified biological monitor shall be retained to oversee the implementation of coastal California gnatcatcher avoidance and minimization measures outlined herein. The biological monitor shall also present

an environmental awareness training program to all project personnel prior to their work on site. The training program shall inform project personnel about the life history of coastal California gnatcatcher and all avoidance and minimization measures. In addition, the biological monitor shall prepare written documentation of all monitoring activities, which shall be submitted to USFWS at the completion of construction activities.

ii. *Coastal California Gnatcatcher Noise Compliance:* Construction noise levels shall not exceed 60 A-weighted decibels (dB[A]) hourly, or an hourly average increase of 3 dB(A) if existing ambient noise levels exceed 60 dB(A), measured at the edge of occupied habitat from February 14–August 31. The following measures shall be implemented to ensure compliance with this noise limit:

- A qualified acoustician shall assess the anticipated construction noise levels and shall coordinate with the qualified biologist to identify noise attenuation measures should activities be anticipated to exceed 60 dB(A) hourly average, or an average increase of 3 dB(A) if existing ambient noise levels exceed 60 dB(A).
- If deemed necessary, noise attenuation measures (e.g., berms, walls) shall be implemented prior to the start of construction activities.
- Concurrent with the commencement of construction activities, noise monitoring shall be conducted at the edge of occupied coastal California gnatcatcher habitat to ensure that noise levels do not exceed 60 dB(A) hourly average, or an average increase of 3 dB(A) if existing ambient noise levels exceed 60 dB(A). Noise monitoring shall be conducted at least twice weekly on varying days, or more frequently depending on the construction activity.
- If the noise attenuation techniques are determined to be inadequate by the qualified acoustician or biologist, then construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of nesting season (August 31).
- If deemed necessary for noise attenuation, the construction contractor shall require functional mufflers on all construction equipment (stationery or mobile) to reduce construction equipment noise. Stationary equipment shall be situated so that noise generated from the equipment is not directed towards any occupied coastal California gnatcatcher habitat.
- The construction contractor shall place staging areas as far as feasible from any suitable coastal California gnatcatcher habitat.

BIO-3: **Least Bell's Vireo Noise Compliance.** No construction activities shall result in noise levels exceeding 60 dB(A) hourly average from March 15 through August 15 within occupied least Bell's vireo habitat (as determined by a qualified avian biologist based on USFWS protocol surveys). An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with Endangered Species Act [ESA]-listed animal species at least two weeks prior to commencement of construction activities.

Prior to the commencement of construction activities during the least Bell's vireo breeding season (March 15–August 15), areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist.

OR

At least two weeks prior to the commencement of construction activities that occur between March 15–August 15, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that construction noise levels will not exceed 60 dB(A) hourly average at the edge of potentially occupied least Bell's vireo habitat (as determined by a USFWS-permitted biologist based on USFWS protocol surveys). Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of suitable least Bell's vireo habitat to ensure that noise levels do not exceed 60 dB(A) hourly average. If the noise attenuation techniques are determined to be inadequate by the qualified acoustician or biologist, then construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of breeding season (August 16). Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of suitable habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the wildlife agencies, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

BIO-4: **Non-Listed Special-Status Reptiles.** All construction personnel working on the project shall attend a worker environmental awareness training that covers basic non-listed special-status reptile identification and required avoidance and minimization measures.

Qualified biological monitors with knowledge of reptile identification and behavior shall be retained to oversee and assist in the implementation of project avoidance and minimization measures and would have the authority to halt work if non-listed special-status reptile is discovered on site or if the project is not in compliance with avoidance and minimization measures.

Non-listed special-status reptiles found within the project footprint during construction shall be relocated by an authorized biological monitor. Relocated species shall be placed in the shade of a large shrub within suitable habitat adjacent to the project site.

BIO-5: **Non-Listed Special-Status Bats.** Construction activities shall be limited to outside of typical bat roosting season, which extends from approximately March to September. Within 60 days prior to ground disturbance or vegetation removal, a qualified biologist shall perform a pre-construction survey of all potential roosting habitat on the project site and within a 300-foot buffer, if construction is to occur during the

roosting season (March–September). If a maternal roost is located, a Bat Mitigation and Avoidance Plan shall be developed by a qualified biologist for CDFW's approval. The Bat Mitigation and Avoidance Plan shall require a 300-foot buffer be established around the roost location. No construction shall occur within this 300-foot buffer until the roosting season concludes, and a qualified biologist determines roost inactivity.

BIO-6: **Nesting Birds.** To ensure compliance with CFGC sections 3503, 3503.5, and 3513 and to avoid potential significant impacts on nesting birds, vegetation clearing, and ground disturbing activities shall be conducted outside of the bird nesting season, which is generally February through July. Regardless of the time of year, a qualified biologist shall conduct a pre-construction nesting bird survey within three (3) days prior to any disturbance of the site, including but not limited to vegetation clearing, disking, demolition activities, and grading.

If active nests are identified during the pre-construction survey, the qualified biologist shall establish species-specific buffers around the nests and the buffer areas shall be avoided until the nests are no longer occupied, and the juvenile birds can survive independently from the nests. Prior to construction, a letter report or mitigation plan in conformance with applicable state and federal law (i.e., appropriate follow-up surveys, monitoring schedules, construction, and noise barriers/buffers, etc.) which includes proposed measures to ensure that take of birds or eggs or disturbance of breeding activities is avoided shall be prepared and implemented by the qualified biologist. The qualified biologist shall verify that all protective measures are in place prior to and/or during construction. During construction activities, biological monitoring shall continue at a frequency recommended by the qualified biologist using their best professional judgement. If nesting birds are detected, avoidance and minimization measures may be adjusted, and construction activities stopped or redirected by the qualified biologist using their best professional judgement to avoid take of nesting birds.

BIO-7: **Jurisdictional Aquatic Features.** Construction activities shall not extend into the potentially jurisdictional aquatic features adjacent to the project's work limits. Flagging and/or fencing shall be installed to clearly mark the project limits/boundaries. The following additional BMPs shall be implemented during and after construction to avoid impacts on any off-site aquatic features:

1. Cut vegetation must be hauled away from potentially jurisdictional features and stored, if necessary, where it cannot be washed by rainfall or runoff into the features.
2. Temporary structures and storage of construction materials shall not be located in potentially jurisdictional waters located off site.
3. When construction is complete, any excess construction materials or debris shall be removed from the project site.

SOURCES: Biological Technical Report (Rocks Biological Consulting 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 the project site may fall into three broad categories: individually eligible buildings, structures, and objects; historic districts; and historic landscapes. The project site is vacant but heavily disturbed. No structures occur on the portion of the parkland proposed for bike park development and none were identified during the archival research conducted by HELIX (2024). No buildings appear in the project area on the 1893 Escondido topographic map, but two roads are recorded to the south and east of the approximate location of Jesmond Dene Park. 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) A Cultural Resources Survey of the project site was conducted by HELIX Environmental Planning (HELIX 2025). A records search was conducted for the project area and a one-mile radius at the South Coastal Information Center (SCIC). A total of 32 cultural resources has been previously recorded within 1 mile of the project area; however, no sites have been recorded within the project site. 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. The Rincon Band of Luiseño Indians, San Luis Rey Band of Mission Indians, San Pasqual Band of Mission Indians, and Viejas Band of Kumeyaay Indians responded to letters sent to the Native American representatives and interested parties identified by the NAHC. The responses indicated that the project area is considered

sensitive to the tribe(s) and requested that a tribal monitor be present for ground disturbing activities related to the project. HELIX then completed a field investigation including an intensive pedestrian survey of the study area by an archaeologist and a Native American monitor. Visibility was good during the survey. 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 affected by the development of the project. However, due to the cultural sensitivity of the project region and requests from tribal representative for monitoring, 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 Measures CUL-1** and **CUL-2**. 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 Measures CUL-1** and **CUL-2** would ensure a **less-than-significant-with-mitigation-incorporated** impact to human remains would occur.

Mitigation Measures

CUL-1 **Archaeological and Native American Monitoring.** An archaeological monitor meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (48 Federal Register 44738) and a Native American monitor representing one of the consulting tribes shall be present during ground-disturbing activities for Project construction, including, but not limited to, site clearing, grubbing, demolition, boring, trenching, grading, and excavation, for the duration of the aforementioned activities or until the archaeological monitor, in agreement with the Native American monitor, determines monitoring is no longer necessary (e.g., initial ground disturbance is complete, soils are sterile for cultural resources).

The archaeological and Native American monitor shall log all monitoring activity and provide such documentation to the City on a bi-weekly basis during the active construction phase. If a discovery is made during ground-disturbing activities, the archaeological monitor shall notify the City of the finding within 24 hours by email and/or phone.

A final compiled monitoring report shall be submitted to the City that documents monitoring activities conducted by the archaeological and Native American monitor within 60 days of completion of monitoring. The report shall document impacts to any known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; and, in a confidential appendix, include the monitoring logs. The final monitoring report shall be submitted to the City, the South Coast Information Center, and any consulting tribes.

CUL-2 **Unanticipated Discoveries.** If a potentially significant archaeological resource is unearthed during excavation activities, work shall stop immediately within 100 feet of the find and the discovery shall be evaluated by a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (48 Federal Register 44738), pursuant to the procedures set forth at California Environmental Quality Act Guidelines section 15064.5. If the resource is determined not significant, no further work is needed. If the find is deemed to be potentially significant, the City shall make a determination of significance on the basis of the recommendations of the qualified archaeologist and submit this determination of significance to the consulting tribe(s) for review and comment. The consulting tribe(s) shall be notified within 24 hours of the discovery via email and phone. The consulting tribe(s) shall be allowed access to the discovery, in order to assist with the significance evaluation. Depending on the nature of the find, the determination of significance may require additional excavation, potentially including the preparation and execution of a Phase II archaeological testing plan and excavation.

SOURCE: Cultural Resources Survey (HELIX 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) Construction of the proposed project would result in temporary energy consumption and one-time, non-recoverable energy associated with construction of the bike park amenities and water connections. 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 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 long-term operation of the bike park would not create a demand for new energy resources as the proposed improvements would not include new lighting. A certain amount of additional fossil fuel resources demand would be produced when bike park users travel to/from the park to use the new facilities. However, the amount of new park users attributable to the bike park amenity would not be substantial given that no new parking is proposed at Jesmond Dene Park; therefore, the project 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 Climate Change Scoping Plan Update, the 2021 California Energy Efficiency Action Plan, and the California Renewables Portfolio Standard Program. These state plans do not include regulations that would apply to a bike park project; therefore, the project would not conflict with or obstruct a state plan for renewable energy or energy efficiency.

The Escondido Municipal Code contains provisions for energy efficiency, primarily focused on energy-efficient lighting, water-efficient landscaping, etc. Construction activities associated with the project would be required to comply with applicable regulations, including applicable requirements for diversion of construction and demolition debris. Accordingly, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant. Once operational, the new bike park would not place a substantial demand on energy resources as energy would only be consumed to access the park, provide drinking and irrigation water, and maintain the new park facility. Therefore, the project would not require new sources of energy to operate. Accordingly, the project would not conflict with existing energy standards or regulations, and impacts would be **less than significant**.

SOURCE: Escondido Municipal Code (City of Escondido 2024a).

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. Specifically, the project area is located in the foothills subprovince of the Peninsular Ranges Geomorphic Province, a region typified by northwest-southeast trending structural blocks separated by major regional fault zones. The project area lies west of the major regional fault and mountain ranges of the Peninsular Ranges Province in an area transitional between the coastal plain to the west and the granitic highlands to the east. Three active faults, including the San Jacinto Fault, Elsinore Fault and Rose Canyon Fault, have the potential to result in seismic ground shaking within the proposed project area. The Rose Canyon fault zone is located approximately 15 miles southwest of the proposed project area. The Elsinore fault zone is located approximately 20 miles northeast of the proposed project area. The San Jacinto fault zone is located approximately 40 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. In addition, all earthwork would be conducted in accordance with the City's Grading and Erosion Control Ordinance. The proposed bike park 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 City, 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 integrity of the bike park components. 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) and CBC (CCR Title 24, Part 2). The CBC is based on the IBC, with appropriate amendments and modifications to reflect site-specific conditions in California. No structures are proposed that would expose people to injury or damage. In addition, the project would comply with the City's Grading Ordinance in the Escondido Municipal Code to ensure that impacts 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 underlain by sandy loams and has been mapped as a liquefaction hazard area in the Community Protection Chapter (VI) of the Escondido General Plan as located within an area of potential Liquefaction Hazard (City of Escondido 2012a). Although no building structures are proposed, the proposed bike park improvements would incorporate measures to accommodate the potential for liquefaction hazards during a seismic event, in accordance with the IIB, CBC and Escondido Municipal Code. 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 City. 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. No potential for landslides has been identified on the project site due to the presence of level topography with no naturally steep slopes or hillsides over 25 percent. Additionally, evidence of landslides and slope instabilities were not mapped within Figure VI-9 of the Community Protection Chapter (VI) of the Escondido General Plan (City of Escondido 2012a). The potential for landslides or slope instabilities to occur within the project area is considered low, and **no impact** would occur.

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 construction and permanent BMPs to be implemented, pursuant to the Escondido Storm Water Design Manual (Kimley-Horn and Associates 2024). Specifically, this would entail implementing appropriate measures to comply with requirements of the following regulations: (1) Section 33 of Article 55 (Grading and Erosion Control) of the Escondido Municipal Code; (2) the City Jurisdictional Urban Runoff Management Plan (JURMP) and related storm water standards; and (3) the NPDES Construction General Permit (NPDES No. CAS000002, SWRCB Order 2009-0009-DWQ, as amended). As described in the project's SWQMP, on-site runoff would be captured and stored in a bio-retention/infiltration basin proposed in the eastern section of the site and off-site runoff would be captured within a proposed earthen v-ditch running along the perimeter of the site and routed to the existing desilting basin to the northwest of the property. Construction stormwater BMPs are required to be shown on the project grading plan and would be provided in the Storm Water Pollution Prevention Plan (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 City and NPDES requirements, associated potential topsoil erosion impacts would be **less than significant**.

c) As discussed above in Section VII(a)iv, the project would not be subject to landslide-related risks, as the site is topographically level, and no potential for landslide hazards has been identified in the Community Protection Chapter (VI) of the Escondido General Plan (City of Escondido 2012a). The site is, however, susceptible to liquefaction events, as discussed in Section VII(a)iii. 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 City. 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 City 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 in Figure 4.6-5 of the Escondido General Plan Final EIR (City of Escondido 2012b). The geotechnical engineer would perform an evaluation of on-site soils and submit the findings to the City. 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 bike park 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 Old Alluvial Valley Deposits, late to middle Pleistocene materials, which have moderate potential for fossil resources according to the General Plan Update Final EIR (2012b). Moderately sensitive geologic formations are judged to have a strong, but often unproven, potential for producing unique fossil remains. Project grading has the potential to reveal paleontological resources when disturbed by construction.

However, it is anticipated that grading, in particular cut, for the bike park would be limited and would not extend to depths that would impact paleontological resources. The project would primarily entail the import of fill to construct the bike park improvements. At shallow depths, project grading would not unlikely 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: Escondido General Plan Final EIR (City of Escondido 2012b); Escondido Municipal Code (City of Escondido 2024a); Priority Development Plan (PDP) SWQMP (Kimley-Horn and Associates 2024a).

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 City's 2021 Climate Action Plan (CAP) was adopted on March 10, 2021 (City of Escondido 2021). The 2021 CAP provides an update to the inventories, projections, and GHG reduction measures identified in the 2013 CAP (City of Escondido 2013b). 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 from both municipal and community activities. 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 the previous citywide GHG emissions inventory from 2012 and following the state's GHG reduction targets, estimated equivalent reductions at the local level would need to reduce emissions to 42 percent below 2012 levels by 2030 and 52 percent below 2012 levels by 2035.

The City has established a GHG screening threshold (set at 500 metric tons carbon dioxide equivalent [MT CO_2e] per year) for new development projects to determine if a project would need to demonstrate consistency with the CAP through the preparation of a CAP Consistency Review Checklist. The proposed project is not a new development project but rather a new recreational amenity being constructed and operated at an existing City park. The project would not be expected to generate more than 500 $MTCO_2e$ annually. Therefore, a CAP Consistency Checklist would not be required to determine that the GHG emissions associated with the bike park amenity would be consistent with the General Plan. The project would be consistent with the citywide GHG emissions projections in the CAP, and **less-than-significant** impacts would occur.

b) The project is 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 City's General Plan or changes to zoning. Long-term operation of the bike park would not result in changes to substantial GHG emissions from maintenance activities, compared to the existing condition. 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 City's 2021 CAP. The impact would be **less than significant**.

SOURCES: General Plan (City of Escondido 2012a); Climate Action Plan (City of Escondido 2021).

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?	☐	☐	☒	☐
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 consists of new recreational amenity at an existing City park. 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 chemical pesticides in certain instances (e.g., landscape maintenance). 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 would not 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. Operation of the bike park would entail a minimal amount of additional park usage and maintenance activities. The level of risk associated with the accidental release of other 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 Reidy Creek Elementary School located approximately 895 feet to the north, along North Broadway. North Broadway School is to the south approximately 1,500 feet from the project site. The project would be a new recreational amenity at an existing City park and would not emit hazardous materials and would only handle a small volume and low concentration of hazardous materials required for maintenance. 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 response IX.b. 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 2024), and the California Department of Toxic Substances Control (DTSC) EnviroStor database (DTSC 2024) 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 Multi-Jurisdictional Hazard Mitigation Plan and related documents, and in the General Plan Community Protection Element. The Multi-Jurisdictional Hazard Mitigation Plan is a countywide plan that identifies risks and ways to minimize damage by natural and human-caused disasters. The plan is a comprehensive resource document that serves many purposes such as enhancing public awareness, creating a decision tool for management, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, and providing inter-jurisdictional coordination. Developed with input from a number of County organizations, local cities and other entities,

the Board of Supervisors for the County adopted the revised 2023 Multi-Jurisdictional Hazard Mitigation Base Plan on February 7, 2023 (County of San Diego 2023). 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 I-15 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." All project construction and site improvements would occur within the confines of the existing park and would not affect any existing ingress or egress to the park. Emergency access to and from the site would continue to occur through the existing park driveways accessible from North Broadway. Therefore, primary access to all major roadways from local properties would be maintained during construction and operational activities and the project would not affect emergency access in the project area. **No impact** would occur.

g) Jesmond Dene Park is located in a semi-urbanized/rural area in northern Escondido, surrounded primarily by low and moderate density residential development interspersed with open space and golf course development surrounding riparian areas for Reidy Creek. According to Figure VI-6 in the General Plan Community Protection Element, the project area and vicinity is located in a high fire hazard zone. 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. Additionally, in accordance with Escondido Municipal Code Chapter 18, Article 5, Section 142, the City's Public Works director has "control of all planting, removal, trimming, pruning of trees, shrubs, ornamental plants, lawns and other growth in recreational areas, parkways and streets within the city …" Routine maintenance of vegetation conducted by the City serves to provide abatement and clearance of vegetation to remove and reduce potential fire hazards. For these reasons, potential impacts associated with short-term fire hazards from project construction would be **less than significant**.

The proposed project would not involve the placement of new structures, nor would it be inconsistent with policies and regulations governing fire safety, including the Escondido Fire Code (found in Escondido Municipal Code Chapter 11, Article 2, Division 1), 2022 California Fire Code, and County of San Diego 2023 Consolidated Fire Code. Conformance with current fire codes would ensure that long-term operational fire hazards would be **less than significant**.

SOURCES: Escondido General Plan Community Protection Element (City of Escondido 2012a);Multi-Jurisdictional Hazard Mitigation Base Plan (County of San Diego 2023); 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 2020); Hazardous Waste and Substances Site List – Site Cleanup (DTSC 2024); GeoTracker database (SWRCB 2024); EnviroStor database (DTSC 2024); Escondido Municipal Code (City of Escondido 2024a).

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?	☐	☐	☒	☐
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) Escondido is within the jurisdiction of the San Diego Regional Water Quality Control Board (SDRWQCB), which is tasked with protecting the region's water quality objectives that meet the standards set forth in the federal Clean Water Act Section 303 as well as the state's Porter-Cologne Water Quality Act. The SDRWQCB 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 Jesmond Dene Park enter Reidy Creek which flows to Escondido Creek.

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 Escondido Storm Water Design Manual (City of Escondido 2016). As described in the project's SWQMP, on-site runoff would be captured and stored in a bio-retention/infiltration basin proposed in the eastern section of the site and off-site runoff would be captured within a proposed earthen v-ditch running along the perimeter of the site and routed to the existing desilting basin to the northwest of the property. The project would also employ source control, low-impact development (LID), and treatment control BMPs. Source control BMPs are site planning practices or structures that aim to prevent urban runoff pollution by reducing the potential for contamination at the source. All development projects within the city must implement source control BMPs 4.2.1 through 4.2.6 of the Escondido Storm Water Design Manual, where applicable and feasible. Source control BMPs would be designed to prevent illicit discharges and potential sources of runoff pollutants and would include posting storm water information and signage for construction personnel and protecting outdoor materials and trash storage areas from rainfall, runoff, and wind dispersal. 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 site is entirely pervious; there is no existing hardscape on the project site. Construction of the project would result in a minor increase in impervious surfaces at the site, with approximately 0.4 acres of impervious surfaces installed at the project site. LID BMPs are storm water management and land development strategies that emphasize conservation, and the use of on-site natural features integrated with engineered, small-scale hydrologic controls to more closely reflect pre-development hydrologic conditions. LID BMPs include optimizing the site layout, minimizing the impervious footprint, dispersing runoff to adjacent landscaping, and draining impervious surfaces to bioretention facilities, planter boxes, cisterns, or dry wells. Structural treatment BMPs are designed to infiltrate, filter, and/or treat runoff from the project footprint. The project would incorporate self-mitigating areas throughout the project to provide stormwater treatment for pollutants, where practical, and an onsite infiltration basin in the northeast portion of the site to accomplish pollutant treatment and hydromodification flow control BMPs. 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. According to the Escondido General Plan Final EIR Figure 4.17-1, the project would rely on water service from the Valley Center Municipal Water District for potable and irrigation water and not ground water supplies. Construction of the bike park would increase impervious surfaces by 0.4 acres, leaving approximately 4.2 acres to be covered with pervious surfaces, such as landscape areas, water quality basins and park area (Kimley Horn 2024a). Infiltration of runoff through those pervious surfaces and biofiltration BMPs would continue upon development of the project site. Therefore, 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, the project site overland flows from the northwest corner and the southwest corner towards the east, into an existing desilting basin within Jesmond Dene Park. Following project construction, runoff generated from the site would be collected by onsite inlets, conveyed through a swale system, and would discharge into an onsite infiltration basin for treatment and detention. The project proposes to sheet flow stormwater to a bioretention basin located at the east side of the site for water quality control and to meet hydromodification and 100-year peak flow retention. The project site would be graded to allow stormwater runoff to be routed to the proposed infiltration basin located in the eastern portion of the site via a series of swales. On-site runoff would be captured and stored in the proposed infiltration basin. The project would discharge all flows through a point in the southeastern corner of the project by making a connection to the existing City-operated desilting basin within Jesmond Dene Park. Offsite runoff would be captured within a proposed earthen v-ditch running along the perimeter of the site and routed to the same existing desilting basin to the northwest of the property.

   i. As described in response 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 Drainage Report, there is one drainage basin on the project site (Kimley-Horn 2024b). Under pre-project conditions, the site produces 17.51 cubic feet per second (cfs) of runoff (i.e., Q_{100}), while under the post-project conditions the site would generate a Q_{100} runoff of 19.40 cfs. According to the Drainage Report, the on-site drainage basin would experience a slight increase in post-project runoff. On-site BMPs and storm drain infrastructure, as described above under responses X.a and X.c, would be installed on site to collect, detain and treat the project's runoff before its discharge to the local storm drain system. The BMPs would be sized to accommodate 100-year flows (Q_{100}) with inlets directing on-site flows to an on-site infiltration basin for treatment and detention. Flows would then be conveyed to the local storm drain system that surrounds the project site, ultimately discharging into the Escondido Creek. Drainage patterns for the proposed condition would remain similar to drainage patterns in the pre-project condition. The proposed drainage system would control runoff volumes and velocities within the site prior to their discharge off site. Therefore, detention of project runoff on site prior to its release would ensure that minor increase in the rate and 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 to the off-site storm drain system. The proposed on-site drainage and water quality improvements integrated into the project and described in responses 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 that would exceed the capacity of existing or planned stormwater drainage systems. In addition, the on-site infiltration basin would treat all runoff before it would be discharged to prevent substantial new sources of polluted runoff. **Less-than-significant** impacts would occur.

iv. According to Figure VI-7 of the General Plan Community Protection Element, the project is not located in a floodplain. All runoff produced in the post-construction condition would be detained and treated before being directed to the local storm drain system. No changes to existing drainage patterns or flood hazards would occur. 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 Section X(c)(iv), and would implement BMPs during construction to reduce potential effects related to release of pollutants during flooding. Tsunamis are usually caused by displacement of the ocean floor causing large waves and are typically generated by seismic activity. Since the project is located approximately 15 miles from the Pacific Ocean, a tsunami hazard is not present. 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, Lake Dixon, is approximately 3 miles away, which is too far to present flood hazards to the project site from a seiche event. The project site would not be subject to flood hazards, tsunamis, or seiches and therefore would not release pollutants due to project inundations. **No impact** would occur.

e) Refer to responses 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: Escondido General Plan Community Protection Element (2012a); Priority Development Project SWQMP (Kimley-Horn and Associates 2024a); Drainage Report for John Masson Bike Park (Kimley-Horn and Associates 2024b).

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 the construction and operation of a bike park as a new recreational amenity at Jesmond Dene Park. The bike park site is an undeveloped but heavily disturbed area with non-motorized activities within the park where no existing structures occur. Development of the project would not remove any uses or physically divide an established community. **No impact** would occur.

b) The Land Use and Community Form Element of the General Plan designates the site for Public Land/Open Space (Figure II-1, General Plan Land Use Map) and the site is zoned Open Space/Parks (OS). The project would construct a 4.6-acre bike park within an existing 40-acre City park, consistent with the land use designation for the property. The project area is located within the boundaries of the Draft Multiple Habitat Conservation Program (MHCP) Subarea Plan; however, the City of Escondido is not a participant in any local Habitat Conservation Plans or Natural Community Conservation Plans. The project area occurs entirely within a public park. Impacts to sensitive biological resources would be avoided as part of the project or mitigated, if avoidance is not feasible, as discussed in responses IV.a through IV.f. Although this project would have potentially significant impacts to biological resources, mitigation measures outlined in this Initial Study Environmental Checklist, including any required approvals from resource agencies would ensure the project would not conflict with applicable regulations protecting sensitive biological resources, in accordance with regional planning efforts. Implementation of 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: Escondido General Plan Land Use and Community Form Element (City of Escondido 2012a); Draft MHCP Subarea Plan (City of Escondido 2001).

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-1 and MRZ-3, which includes areas where there are no significant mineral deposits present or likely to be present, as well as areas where mineral resource significance is undetermined, respectively (City of Escondido 2012b). According to Figure 4.11-1 of the General Plan FEIR, no existing or past mineral extraction facilities are located within the project area (City of Escondido 2012b). The site has not been associated with mineral mining or excavation and is located in a semi-urbanized area of the City where mineral extraction is not feasible. 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 known mineral resources as designated by a local general plan within the project area. As described in Section XII(a), no existing or planned mining operations occur within the project area or immediate vicinity. 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: Escondido General Plan Final EIR (City of Escondido 2012b).

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) Construction noise in the city is regulated by Escondido Municipal Code section 17-234. For grading activities specifically, Escondido Municipal Code section 17-238 applies. The code prohibits construction on Sundays and holidays and allows construction between 7 a.m. and 6 p.m. on weekdays and between 9 a.m. and 5 p.m. on Saturdays. Grading activities are specifically restricted to the listed weekday hours, unless otherwise allowed by the City Manager. Section 17-234 also prohibits operation of construction equipment or combinations of construction equipment that generate noise levels in excess of 75 decibels (dB) 1-hour average sound level (LEQ [1 hour]). For grading activities, a sound level of 75 dB LEQ is not to be exceeded at the property line of a residential property.

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 bike park installation on the project site. Construction of the project site 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 Escondido Municipal Code with regard to construction activity hours and noise levels. Therefore, **less-than-significant** construction noise impacts would occur.

The City's General Plan Community Protection Element is the guiding document for land use and noise compatibility. The General Plan identifies noise sources that impact the community with the intent of minimizing exposure to excessive noise levels through the application of policies and programs. Regarding operational noise for the project, following completion of construction, operational activities and related noise that occurred under the pre-project conditions would resume. These activities include occasional park maintenance and recreational use of the project area. Occasional vehicle trips associated with park maintenance would not result in perceptible changes to traffic noise in the project area. Operational noise sources would be limited to new recreational users of the bike park and non-motorized bike operations. Any increase in operational noise is anticipated to be minor due to absence of stationary noise sources in the project design, such as motorized equipment, and limited amount of additional vehicular trips along local roads (as discussed under response XVII.b). 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. Per Federal Transit Administration vibration criteria provided in the General Plan Final EIR, an impact would occur if construction would generate vibration levels greater than 65 vibration decibels (VdB) at a vibration-sensitive land use, 80 VdB at the nearest residence or building where people sleep, or 83 VdB at the nearest institutional land use with primarily daytime uses (City of Escondido 2012b). The thresholds further indicate structural damage to buildings could occur if peak particle velocity (PPV) between 0.2 and 0.5 inches per second (in/sec) would occur at a structure. 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 is approximately 250 feet to the north along Jesmond Dene Road. Reidy Creek Elementary School is situated 895 feet north of the project site along North Broadway

   Of the anticipated, typical construction equipment, loaded dump trucks are anticipated to generate the highest vibration levels. According to Table 4.12-9 of the General Plan FEIR, a loaded dump truck could generate 68 VdB and 0.01 in/sec PPV at a distance of 100 feet. At a distance of 250 feet from the project site, the loaded dump truck would not generate vibration in excess of the levels cited in the General Plan FEIR. The levels of vibration at the school located 895 feet to the north would also be below the daytime threshold due to distances. Therefore, vibration as a result of construction of the proposed project would be below the City'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: Escondido Municipal Code (City of Escondido 2024a); Escondido General Plan Final EIR (City of Escondido 2012b).

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 on City parkland that is zoned Open Space/parks (OS) and surrounded by residential development. The proposed bike park would not require the extension of new public roads, and the utility infrastructure (i.e., potable water and irrigation lines) would be sized to meet the needs of the project. As a new recreational amenity at an existing park, 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 is proposed on a vacant portion of an existing City park and would not result in the displacement of residents from the existing on-site housing or necessitate the construction of replacement housing elsewhere. **No impact** would occur.

SOURCE: Escondido General Plan Land Use and Community Form Element (City of Escondido 2012a).

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 Escondido Fire Department (EFD). The EFD maintains the standard emergency response time of 7.5 minutes 90 percent of the time for all structure fires and emergency Paramedic Assessment Units (City of Escondido 2012a). The closest fire station to the project Area is Station #3, located approximately 2 miles southwest of the project area on Nutmeg Street north of El Norte Parkway. Operation of the project would be consistent with existing recreational use of Jesmond Dene Park but would introduce a new recreational amenity at the park with no habitable structures. The incremental demand for fire protection services associated with operating the bike park would not place a substantial demand on the EFD 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) The project would be served by the Escondido Police Department (EPD). The EPD maintains the standard initial response times of less than 5 minutes for Priority 1 calls and less than 6.5 minutes for Priority 2 calls (City of Escondido 2012a). The closest police station to the project area is approximately 3 miles south of the project area on Centre City Parkway. Operation of the project would be consistent with existing recreational use of Jesmond Dene Park but would introduce a new recreational amenity at the park with no habitable structures. The incremental demand for police protection services associated with operating the bike park would not place a substantial demand on the EPD that would increase emergency response times. Therefore, there would be no need for new or altered police protection facilities or related infrastructure that could result in significant adverse physical impacts. No impact would occur. Impacts would be **less than significant**.

c) Operation of the bike park would be consistent with existing recreational use of Jesmond Dene Park but would introduce a new recreational amenity at the park. Additionally, the project would not introduce a new 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 the existing facilities. **No impact** would occur.

d) The project would not increase the demand for park space but would result in a minor increase usage at Jesmond Dene Park. According to the Community Health and Services Element of the City's General Plan, Escondido has 32 parks comprising 6,556.3 acres in the city, including the 40-acre Jesmond Dene Park within which the project is located (City of Escondido 2012a). The project proposes to add a bike park amenity to increase the recreational offerings at the existing park. Temporary use of the project area would be restricted during construction; however, no existing improvements are situated on site. Once construction has been completed, the area would be accessible to the public, improving upon the existing recreational options at the park. The project would not create a substantial increased demand on the park itself, as the additional visitation of the park would be limited to the parking supply that exists today. Impacts related to parks would be **less than significant**.

e) 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: Escondido General Plan Final EIR (City of Escondido 2012b).

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) The project involves the addition of a bike park amenity at Jesmond Dene Park, which would incrementally increase park usage but not substantially because additional parking would not be provided to service the new recreation use. Therefore, the increase in demand would

be minor and would not lead to the substantial deterioration of existing City parks. **Less-than-significant** impacts are identified.

b) The physical environmental impacts of constructing the proposed bike park amenity at Jesmond Dene Park 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: Escondido General Plan Community Health Services Element (City of Escondido 2012a).

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 add a new recreational amenity to an existing City park. According to Escondido Zoning Code Article 47, while changes in level of service (LOS) at street intersections or segments may not be used to determine whether a project would cause traffic impacts for purposes of CEQA analysis, they may be used to determine if the project is consistent with the General Plan's Street Network Policy 7.3. The operations of the park with the bike park in place would not substantially increase the amount of travel to and from the project area. The construction of the bike park would add a new amenity but would not act as a major attraction for additional park visitors. As such, once operational, the bike park would be consistent with existing traffic conditions in the project area, would not result in changes in LOS at street intersections and segments, and would not conflict with the General Plan's Street Network Policy 7.3. 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 internally within the park. Therefore, the project would not conflict with any adopted programs, plans, or policies related to the local circulation system, including those in the

Mobility and Infrastructure Element of the General Plan. **Less-than-significant** impacts would occur.

b) 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 vehicle miles traveled (VMT) as the appropriate measure for transportation impacts and eliminates automobile delay as appropriate for the determination of potentially significant transportation and traffic impacts. VMT is defined as a measurement of miles traveled by vehicles within a specified region and for a specified time period. 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. According to the project's Scoping Agreement contained in Appendix E of this document, the 4-acre project would have the potential to produce 200 new daily vehicle trips based on the SANDAG trip generation rate for City park (i.e., 50 users per acre). The City assumes that half (or 50 percent) of the new users would travel to and from the bike park via cycling, while the remaining half would drive and park on site. The City is anticipating that about 20 percent of the bike park users would be individuals who currently use the informal bike track on site. With these adjustments made, the project would produce approximately 80 new daily trips once the p=bike park is operational. Given that the project is a locally serving public facility, it would be screened out from needing a CEQA VMT analysis. The project is also waived from having to conduct a non-CEQA Local Mobility Analysis because the project's ADT would be well below the 500 ADT threshold applied to projects where affected road segments and intersections currently operate at level of service (LOS) C or better (City of Escondido 2025a). The project would not contribute to a substantial increase in operational trips in the project area. Therefore, no conflicts or inconsistencies with CEQA Guidelines section 15064.3 subdivision (b) would occur. Impacts would be **less than significant**.

c) The bike park project would be constructed entirely on existing parkland and not require any modifications to access points along North Broadway or changes to off-site streets. The project would not include incompatible uses of the site or surrounding areas. Therefore, impacts related to increase in hazards from project design features would be **less than significant**.

d) See Section 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 not involve off-site roadway (or other applicable) improvements that would result in associated roadway/lane closures or related impacts to emergency response or evacuation plans; (3) no indirect effects to regional and local roadways (including I-15 and the designated emergency evacuation routes noted above) 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: Escondido General Plan Mobility and Infrastructure Element (City of Escondido 2012a); Scoping Agreement for Transportation Studies (City of Escondido 2025).

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) As detailed in Section V(b), the general vicinity of the project area is known to have been occupied/used by the Luiseño and Kumeyaay people for thousands of years. 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 in 2023 for the project by HELIX (2025). The results were positive and indicated that the project area is within the ancestral territory of the San Luis Rey Band of Mission Indians, Rincon Band of Luiseño Indians, San Pasqual Band of Mission Indians, and Viejas Band of Kumeyaay Indians. Although no tribal cultural resources have been identified within the project area, there is potential for unrecognized resources to be discovered during grading and water line trenching activities. The potential for unknown cultural resources is higher due to the presence of alluvial soils and the proximity of the site to Reidy Creek. **Mitigation Measures CUL-1** and **CUL-2** identified in Section V, above, would be implemented to ensure that potential impacts to tribal cultural resources would be **less than significant with mitigation incorporated**.

b) On November 21, 2024, in compliance with California Public Resources Code section 21080.3.1 (AB 52), the City of Escondido, as Lead Agency, sent a letter to the local tribes notifying them of the proposed project (refer to Appendix F of this document). Responses to the AB 52 consultation notice were received from San Luis Rey Band of Mission Indians, Rincon Band of Luiseño Indians, San Pasqual Band of Mission Indians, and Viejas Band of Kumeyaay Indians. Therefore, it is assumed that potentially significant impacts to

TCRs would occur. Construction monitoring by an archaeologist and Native American tribal representative would be implemented during project grading, in accordance with **Mitigation Measures CUL-1** and **CUL-2**, to address the inadvertent discovery of unknown buried archaeological resources or TCRs. **Less-than-significant impacts would occur with mitigation incorporated**. Refer to response V.b for additional discussion.

SOURCES: Cultural Resources Survey (HELIX Environmental Planning 2025); AB 52 Tribal Consultation Correspondence (City of Escondido 2024b).

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) Water service is currently provided to the park and would be provided to the site by Valley Center Municipal Water District. For potable water service, the project would connect to the existing on-site water line within Jesmond Dene Park to provide a new water drinking station near the bike park amenity. Permanent irrigation is not proposed for the on-site native hydroseeding, which would be timed to take advantage of seasonal rainfall. No new

wastewater connections would be constructed by the project. Storm water drainage collection/treatment BMPs and conveyance facilities would be constructed as part of the project with ultimate connections to the off-site siltation basin located within Jesmond Dene Park, near the southeastern corner of the project site. No changes to electric power and natural gas facilities would be required as part of the project. Construction of the new water connection would occur within the limits of work analyzed for the project and within Jesmond Dene park. No additional significant environmental effects would occur, and **less-than-significant** impacts are identified.

b) As noted above under response XIX.a, the project site is within the service area of the Valley Center Municipal Water District. Operation of the project would require a negligible increase in water supply for a drinking water station. A short-term increase in demand for water during construction, including implementation of construction BMPs, would occur. The installation of native hydroseed would be timed to take advantage of seasonal rainfall and not require the use of temporary irrigation. The temporary nature of the required water 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) Construction and operation of the project would not require wastewater services or treatment. The bike park project would not require the extension of any wastewater services to the site; the ultimate condition would be similar to existing conditions and would not affect the capacity of the City's wastewater treatment system. Therefore, **no impact** would occur.

d) During construction, the project would temporarily create solid waste that would be collected by Escondido Disposal, Inc. and disposed of at a regional landfill. Construction debris is anticipated to be limited since the project site is undeveloped. Operation of the project would produce a negligible amount of solid waste by bike park users. Collection bins would be sited near the bike park 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 response 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 City's solid waste reduction programs. As such, impacts would be **less than significant**.

e) The project would comply with the City'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 City's solid waste disposal policies and practices. Associated impacts would be **less than significant**.

SOURCE: Escondido General Plan Final EIR (City of Escondido 2012b).

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 response IX(f). There would be **no impact** to emergency response or evacuation plans.

b) The City of Escondido is currently updating its Community Wildfire Protection Plan (CWPP) in 2025 to identify high-risk areas and recommend mitigation strategies, which includes vegetation management and fire-hardening of structures. The Escondido Fire Code (in the Escondido Municipal Code) also sets minimum standards for fire prevention and safety for new and existing buildings. The project area is topographically level but is located in a Very High Fire Hazard Severity Zone (FHSZ), as recommended by the State Fire Marshal in 2025 (CAL FIRE 2025). However, the project would not introduce new occupied structures and would adhere to the Escondido Fire Code (found in Escondido Municipal Code Chapter 11, Article 2, Division 1), 2022 California Fire Code, and County of San Diego 2023 Consolidated Fire Code. Conformance with current fire codes would ensure that wildfire risks within the project area would not be exacerbated as a result of the bike park. 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 a new recreational amenity at an existing City park. The proposed project would not install infrastructure such as roads, fuel

breaks, emergency water sources, power lines, or other utilities that may exacerbate fire risk. Additionally, as discussed in response IX(g), consistent with Escondido Municipal Code Chapter 18, Article 5, Section 142, the City Public Works director has control of all planting, removal, trimming, pruning of vegetation and other growth in recreational areas, which would provide abatement and clearance of vegetation to remove and reduce potential fire hazards. **No impact** would occur.

d) The project site is situated downslope of a hillside above existing residentially developed lands. The project would not involve the construction of occupiable structures. Refer to Section XX(b). The risk to people and structures from downslope or downstream flooding or landslides resulting from runoff, post-fire slope instability, or drainage changes is negligible. Impacts would be **less than significant**.

SOURCES: State-wide Fire Severity Zone Maps (CAL FIRE 2025); Escondido Municipal Code (City of Escondido 2024a).

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?	☐	☐	☒	☐
d)	Where deficiencies exist relative to the City's General Plan Quality of Life Standards, does the Project result in deficiencies that exceed the levels identified in the Environmental Quality Regulations (City of Escondido Zoning Code Article 47 Section 33-924(a))?	☐	☐	☒	☐

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-8, 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, however, impacts to unknown subsurface cultural resources 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, the project would result in **less-than-significant impacts with mitigation incorporated** for biological resources and cultural resources. All other impacts would be either less than significant or no impact. Development of the 4.57-acre project site would not result in significant cumulative impacts on sensitive biological resources or special-status species due to the developed nature of the project vicinity, the project site's current use as a recreational biking space, and the limited amount suitable special-status species habitat within and directly abutting the project site. As a result, cumulative impacts on biological resources would be less than significant. 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, 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, 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**.

d) The General Plan Quality of Life Standards provide thresholds for potential impacts to air quality, schools, wastewater facilities, water supply, circulation, police and fire services, libraries, parks/open space, and economic prosperity within the city (City of Escondido 2009). As described throughout this IS/MND, the project would result in less-than-significant impacts related to air quality and would not adversely impact the services identified above. Moreover, the project is consistent with designated land use and does not propose development of a new or expanded use compared to existing conditions. As such, no deficiencies relative to the City's General Plan Quality of Life Standards or related conflicts with the City EQR would occur. Impacts would be **less than significant**.

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