

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT SAN DIEGO UNIFIED SCHOOL DISTRICT CAPITAL IMPROVEMENT PROGRAM

March 22, 2019

The San Diego Unified School District (District) will be the Lead Agency for preparing a Program Environmental Impact Report (PEIR) in accordance with the California Environmental Quality Act (CEQA) for the Capital Improvement Program (Proposed Program). The District is soliciting public and agency input on the scope and content of the environmental analysis to be contained in the PEIR. The project description, location, and possible environmental effects of the Proposed Program are described below.

Due to the time limits mandated by state law, your comments must be sent no later than 30 days after receiving this notice. Comments regarding the scope of the environmental analysis within the PEIR will be accepted until April 22, 2019. Comments can be sent electronically via email or through regular mail to the contact provided below.

Project Title: San Diego Unified School District Capital Improvement Program

Project Applicant: San Diego Unified School District

Project Location: The Proposed Program includes improvements at all District academic and administrative facilities throughout the City of San Diego.

Project Description: The District is proposing to establish and implement its Capital Improvement Program (Proposed Program). The Proposed Program would include various project types to repair, renovate, and revitalize District schools and administration facilities. The repair, renovation, and revitalization projects associated with the Proposed Program would include a wide range of future construction and operation activities on either existing school sites or administration facilities or on new, currently unidentified sites.

Probable Environmental Effects: The District prepared an initial study/environmental checklist and has determined that a PEIR will be prepared for the Proposed Program (CEQA Guidelines §15063[a]). The initial study/environmental checklist concluded the Proposed Program would have no impact or a less-than-significant impact on the following environmental issue areas: agriculture and forestry resources, mineral resources, population and housing, and public services. The initial study/environmental checklist concluded the Proposed Program could have a potentially significant impact on the following resources, and therefore would be fully analyzed within the PEIR: aesthetics, air quality and health risk, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions and climate change, hazards and hazardous materials, hydrology and water quality, land use and planning, noise and vibration, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire.

A copy of the initial study/environmental checklist is available for review at the following locations:

- San Diego Unified School District (Physical Plant Operations Center Annex, Room 5), 4860 Ruffner Street, San Diego CA 92111; and
- Online at https://www.sandiegounified.org/environmental-reviews
- San Diego Downtown Main Library, 330 Park Blvd, San Diego, CA 92101

Pursuant to State CEQA Guidelines Section 15082(b), comments regarding the scope and content of the environmental analysis must be submitted no later than 30 days after receipt of this notice. The public review period is from March 22, 2019 until April 22, 2019. Please send your comments no later than 5:00 p.m. on Monday, April 22, 2019 directly to:

Paul Garcia, CEQA Environmental Coordinator San Diego Unified School District Facilities Planning & Construction/Annex 5 4860 Ruffner Street San Diego, CA 92111 or via email to: environmental@sandi.net

The district will also hold public scoping meetings on the following dates and locations:

- 6:00 p.m., April 10, 2019 at Morse High School Auditorium, 6905 Skyline Drive, San Diego, CA 92114
- 6:00 p.m., April 11, 2019 at Scripps Ranch High School Library, 10410 Falcon Way, San Diego, CA 92131
- 6:00 p.m., April 16, 2019 at Mission Bay High School Library, 2475 Grand Avenue, San Diego, CA 92109
- 6:00 p.m., April 17, 2019 at Hoover High School Library, 4474 El Cajon Boulevard, San Diego, CA 92115
- 6:00 p.m., April 18, 2019 at University City High School Auditorium, 6949 Genesee Avenue, San Diego, CA 92122

The public meetings will provide an opportunity to disseminate information and solicit comments on the scope and content of the PEIR for the Proposed Program. For more project information, please contact Paul Garcia, CEQA Environmental Coordinator, at (858) 637-6290.



AVISO DE LA PREPARACIÓN DE UN REPORTE DEL IMPACTO AMBIENTAL

PROGRAMA DE MEJORAS DE CAPITAL DEL DISTRITO ESCOLAR UNIFICADO DE SAN DIEGO

22 de marzo de 2019

El Distrito Escolar Unificado de San Diego (Distrito) será la Agencia Encargada de preparar un Reporte del Impacto Ambiental del Programa (PEIR) conforme a la Ley de California de Calidad Medioambiental (CEQA) para el Proyecto de Modernización del Plantel Completo (WSM) del Programa de Mejoras de Capital (Programa Propuesto). El Distrito está solicitando opiniones públicas y de agencias en la gama y el contenido del análisis ambiental que se debe incluir en el PEIR. La descripción del proyecto, el lugar y los posibles efectos ambientales del Programa Propuesto se describen a continuación.

Debido a los límites de tiempo establecidos por las leyes estatales, sus comentarios se deben enviar a más tardar 30 días después de haber recibido este aviso. Los comentarios sobre la gama del análisis ambiental dentro del PEIR se aceptarán hasta el 22 de abril de 2019. Los comentarios se pueden enviar electrónicamente por email o por correo regular al contacto proporcionado a continuación.

Título del proyecto: Programa de Mejoras de Capital del Distrito Escolar Unificado de San Diego

Solicitante del proyecto: Distrito Escolar Unificado de San Diego

Ubicación del proyecto: El Programa Propuesto incluye mejoras en todas las instalaciones académicas y administrativas del Distrito por toda la Ciudad de San Diego.

Descripción del proyecto: El distrito propone establecer e implementar su Programa de Mejoras de Capital (Programa Propuesto). El Programa Propuesto incluiría varios tipos de proyectos para reparar, renovar y revitalizar las escuelas y las instalaciones administrativas del Distrito. Los proyectos de reparación, renovación y revitalización relacionados al Programa Propuesto incluirían una gama amplia de construcción futura y actividades operativas en planteles escolares o instalaciones administrativas existentes o en lugares nuevos que no hayan sido identificados actualmente.

Efectos ambientales probables: El Distrito preparó un estudio inicial/una lista de reviso ambiental y ha determinado que un PEIR será preparado para el Programa Propuesto (Pautas de CEQA §15063[a]). El estudio inicial/la lista de reviso ambiental concluyó que el Programa Propuesto no tendría un impacto o tendría un impacto menos de lo significante en las siguientes áreas de los asuntos ambientales: recursos agrícolas y forestales, recursos minerales, poblaciones y alojamiento y servicios públicos. El estudio inicial/la lista de reviso ambiental concluyó que el Programa Propuesto podría tener un posible impacto significante en los siguientes recursos, y por lo tanto serían analizados plenamente dentro del PEIR: estética, calidad del aire y riesgos de salud, recursos biológicos, recursos culturales, energía, geología y tierras, emisiones de gases de efecto invernadero y cambios al clima, peligros y materiales peligrosos, hidrología y calidad del agua, uso del terreno y planificación, ruido y vibración, recreación, transporte, recursos culturales tribales, servicios públicos y sistemas de servicio e incendios forestales.

El borrador del estudio inicial/la lista de reviso ambiental está disponible para su lectura en los siguientes lugares:

- El Distrito Escolar Unificado de San Diego (Anexo del Centro de Operaciones Físicas de los Planteles, Salón 5) 4860 Ruffner Street, San Diego, CA 92111; y
- En línea en https://www.sandiegounified.org/environmental-reviews
- La Biblioteca Principal del Centro de San Diego, 330 Park Blvd, San Diego, CA 92101

Conforme a la Sección 15082(b) de las Pautas Estatales de CEQA, los comentarios sobre la gama y el contenido del análisis ambiental deben entregarse a más tardar 30 días después de recibir este aviso. El periodo de revisión pública es del 22 de marzo de 2019 hasta el 22 de abril de 2019. Por favor envíen sus comentarios a más tardar a las 5:00 p.m. el lunes, 22 de abril de 2019 directamente a:

El distrito también realizará juntas de ámbito público en las fechas y los lugares a continuación:

- 6:00 p.m., 10 de abril de 2019 en el auditorio de la Escuela Preparatoria Morse, 6905 Skyline Drive, San Diego, CA 92114
- 6:00 p.m., 11 de abril de 2019 en la biblioteca de la Escuela Preparatoria Scripps Ranch, 10410 Falcon Way, San Diego, CA 92131
- 6:00 p.m., 16 de abril de 2019 en la biblioteca de la Escuela Preparatoria Mission Bay, 2475 Grand Avenue, San Diego, CA 92109
- 6:00 p.m., 17 de abril de 2019 en la biblioteca de la Escuela Preparatoria Hoover, 4474 El Cajon Boulevard, San Diego, CA 92115
- 6:00 p.m., 18 de abril de 2019 en el auditorio de la Escuela Preparatoria University City, 6949 Genesee Avenue, San Diego, CA 92122

Las juntas públicas proporcionarán una oportunidad para diseminar información y solicitar comentarios sobre el alcance y el contenido del PEIR del Programa Propuesto. Para más información sobre el proyecto, por favor comuníquense con Paul Garcia, coordinador ambiental de CEQA, al (858) 637-6290.

SAN DIEGO UNIFIED SCHOOL DISTRICT CAPITAL IMPROVEMENT PROGRAM INITIAL STUDY/ENVIRONMENTAL CHECKLIST

PREPARED FOR THE:



San Diego Unified School District 4860 Ruffner Street, Annex Room 5 San Diego, CA 92111 Contact: Paul Garcia

(858) 637-6290

PREPARED BY:

ICF

525 B Street, Suite 1700 San Diego, CA 92101

Contact: Kathie Washington

(858) 444-3565

March 2019





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San Diego Unified School District	
ICF	

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Acronyms and Abbreviations

AB Assembly Bill

ADA Americans with Disability Act
ALUCP Airport Land Use Compatibility Plan

Bay San Diego Bay

CARB California Air Resources Board CCR California Code of Regulations

CEQA California Environmental Quality Act
CHPS Collaborative for High Performance Schools

District San Diego Unified School District

EO Executive Order

FUDS Formerly Used Defense Sites

GHG greenhouse gas
IS initial study

MBTA Migratory Bird Treaty Act
MCAS Marine Corps Air Station
MHPA Multi-Habitat Planning Area
MND mitigated negative declaration

MRZ Mineral Resource Zone

MSCP Multiple Species Conservation Program

ND negative declaration

 O_3 ozone

PEIR Program Environmental Impact Report

PM particulate matter

PM10 particulate matter less than 10 microns in diameter PM2.5 particulate matter less than 2.5 microns in diameter

PRC Public Resources Code

Proposed Program Capital Improvement CEQA Compliance Program

RAQS Regional Air Quality Strategy

SANDAG San Diego Association of Governments

SB Senate Bill

SDAB San Diego Air Basin

SDCAPCD San Diego County Air Pollution Control District

SDIA San Diego International Airport SOPs standard operating procedures

SR- State Route

UST underground storage tank

VHFHSZ Very High Fire Hazard Severity Zones

Overview

The San Diego Unified School District (District), as the lead agency under the California Environmental Quality Act (CEQA), has prepared this initial study (IS) to evaluate the potential environmental impacts associated with implementation of the District's Capital Improvement Program (Proposed Program). The purpose of the IS is to help focus the scope of the environmental analysis for the Program Environmental Impact Report (PEIR). The Proposed Program would include various project types to repair, renovate, and revitalize District schools and administrative facilities. Establishment and implementation of the Proposed Program would require approval by the District's Board of Education. As part of the District's discretionary review process, the Proposed Program is required to undergo environmental review in accordance with CEQA.

CEQA Requirements

Approval of the Proposed Program is a discretionary action and therefore is subject to the requirements of CEQA (Public Resources Code [PRC], Division 13, Sections 21000–21177) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Sections 15000–15387). An Initial Study/Environmental Checklist is prepared to provide the basis for deciding whether to prepare an EIR, a mitigated negative declaration (MND), or a negative declaration (ND) for a project subject to CEOA.

Initial Study Organization

The content and format of this report are designed to meet the requirements of CEQA. This IS identifies the potential significant environmental impacts of the Proposed Program to support the decision to prepare an EIR, MND, ND, or Notice of Exemption. The report contains the following sections.

- Chapter 1, *Introduction and Overview*, identifies the purpose and scope of the Initial Study and the terminology used in the report.
- Chapter 2, *Project Description*, identities the location and background of the Proposed Program and describes the Proposed Program in detail.
- Chapter 3, *Environmental Checklist*, presents the checklist responses for each resource topic. The chapter also includes a brief setting section for each resource topic and identifies the potential impacts of implementing the Proposed Program.
- Chapter 4, *References*, identifies all printed references and individuals cited in this Initial Study.
- Chapter 5, *List of Preparers*, identifies the individuals who prepared this report and their areas of technical expertise.

San	Diego	Unified	School	District
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Introduction and Overview

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Program Overview

Pursuant to CEQA, the District currently conducts a separate impact analysis for each of its capital improvement projects. To improve efficiency, the District proposes to establish the Proposed Program to repair, renovate, and revitalize District schools and administration facilities. The Proposed Program is a discretionary action and must be approved by the District's Board of Education. The repair, renovation, and revitalization projects associated with the Proposed Program would include a wide range of future construction and operational activities on either existing school sites or administration facilities or on new, currently unidentified sites.

While no site-specific projects are proposed at this time, the Proposed Program consists of several types of common District capital improvement projects that could be implemented at any of the District's school or administrative sites. As a result, implementation of the Proposed Program would involve reasonably foreseeable construction and operational activities that could potentially result in physical changes to the environment and significant environmental impacts. Therefore, the analysis presented in Chapter 3 of this IS provides a programmatic level analysis of the potential environmental impacts that could result from implementation of the District's capital improvement projects. Because project details for future construction and operational activities are not available at this time, this analysis includes a number of assumptions, including the type of activities, amount of ground disturbance, and types of equipment. Once more specific details are known for a particular project, additional environmental review pursuant to State CEQA Guidelines Section 15168 will be conducted.

Program Location

The program area includes the entire boundary of the District, which is entirely within the jurisdictional boundaries of the City of San Diego in southwestern San Diego County. The Proposed Program's location in relationship to the surrounding San Diego region is depicted on Figure 2-1. Neighboring San Diego County school districts include: Del Mar Union, San Dieguito Union High School, and Poway Unified to the north; Santee, Cajon Valley Union, Lemon Grove, and Grossmont Union High School to the east; and Coronado Unified, National Elementary, Chula Vista Elementary, and Sweetwater Union High School to the south.

Environmental Setting

The District has 225 educational facilities throughout the City of San Diego. District-wide enrollment during the 2018–2019 school year is approximately 118,348 students (District 2018). In accordance with Vision 2020, District schools are organized into clusters for greater community cohesion. The District consists of 16 clusters that are organized geographically; each has a high school and the elementary and middle schools that feed into it to create a continuity for the neighborhood students in

the pre-K to 12 program. In addition to traditional schools, clusters also contain atypical and charter schools. Figure 2-2 depicts the locations of each cluster within the District. Tables 2-1 through 2-16 identify the schools by school type (e.g., elementary and middle school), 2018–2019 student enrollment, and student enrollment capacity for each cluster.

Table 2-1. Clairemont Cluster Details

School	Address	2018-2019 Enrollment
Elementary Schools (ES)		
Alcott ES	4680 Hidalgo Avenue	439
Bay Park ES	2433 Denver Street	504
Cadman ES	4370 Kamloop Avenue	191
Holmes ES	4902 Mt. Ararat Drive	560
Toler ES	3350 Baker Street	264
Middle Schools (MS)		
Marston MS	3799 Clairemont Drive	670
High Schools (HS)		
Clairemont HS	4150 Ute Drive	917
Atypical Schools		
Longfellow K-8	5055 July Street	714
John Muir TK-12	4431 Mt. Herbert Avenue	187
Mt Everest K-12	4350 Mt. Everest Boulevard	269
Riley K-12	5650 Mt. Ackerly Drive	192
Whittier K-12	3401 Clairemont Drive	54
ES = elementary school; MS = middle scho	ol; HS = high school; K = kindergarten; TK = tra	nsitional kindergarten.

Table 2-2. Crawford Cluster Details

		2018-2019
School	Address	Enrollment
Elementary Schools		
Carver ES	3251 Juanita Street	246
Clay ES	6506 Solita Avenue	313
Euclid ES	4166 Euclid Avenue	495
Fay ES	4080 52nd Street	595
Ibarra ES	4877 Orange Avenue	458
Marshall ES	3550 Altadena Avenue	490
Oak Park ES	2606 54th Street	530
Rolando Park ES	6620 Marlowe Drive	209
Middle Schools		
Mann MS	4345 54th Street	771
High Schools		
Crawford HS	4191 Colts Way	1,125

School	Address	2018-2019 Enrollment
Atypical Schools		
Language Academy K-8 ¹	4961 64th Street	1,006
Charter Schools		
City Heights Prep 6–11	3770 Altadena Avenue	118
Darnall TK-8	36065 Santa Fe Avenue	655
Iftin K-8	5465 El Cajon Boulevard	349
Tubman Village K-8	6880 Mohawk Street	405

 $^{^{1}}$ School located within the Crawford-Henry, Mann-Lewis, and Clay-Hardy Optional Area, and therefore is included in both clusters.

Table 2-3. Henry Cluster Details

School	Address	2018-2019 Enrollment
Elementary Schools	Huar 000	Ziii oiiiiiciit
Benchley/Weinberger ES	6269 Twin Lake Drive	562
Dailard ES	6425 Cibola Road	531
Foster ES	6550 51st Street	414
Gage ES	6811 Bisby Lake	576
Green ES	7030 Wandermere Drive	451
Hardy ES	5420 Montezuma Road	347
Hearst ES	6230 Del Cerro Boulevard	513
Marvin ES	5720 Brunswick Avenue	520
Middle Schools		
Lewis MS	5170 Greenbrier Avenue	1,061
Pershing MS	8204 San Carlos Drive	693
High Schools		
Henry HS	6702 Wandermere Drive	2,433
Atypical Schools		
Language Academy K–8 ¹	4961 64th Street	1,006
Charter Schools		
Magnolia Science Academy 6-8	6365 Lake Atlin Avenue	410

 $^{^{\}rm 1}$ School located within the Crawford-Henry, Mann-Lewis, and Clay-Hardy Optional Area, and therefore is included in both clusters.

ES = elementary school; MS = middle school; HS = high school; K = kindergarten; TK = transitional kindergarten.

ES = elementary school; MS = middle school; HS = high school; K = kindergarten.

Table 2-4. Hoover Cluster Details

School	Address	2018-2019 Enrollment
Elementary Schools	Hudiess	Lintonnicht
Adams ES	4672 35th Street	291
Central ES	4063 Polk Avenue	664
Cherokee Point ES	3735 38th Street	391
Edison ES	4077 35th Street	406
Franklin ES	4481 Copeland Avenue	378
Hamilton ES	2807 Fairmont Avenue	505
Joyner ES	4271 Myrtle Avenue	570
Normal Heights ES	3750 Ward Road	344
Rosa Parks ES	4510 Landis Street	919
Rowan ES	1755 Rowan Street	229
Middle Schools		
Clark MS	4388 Thorn Street	965
Wilson MS	3838 Orange Avenue	713
High Schools		
Hoover HS	4474 EL Cajon Boulevard	2,180
Charter Schools		
Health Sciences High and Middle	3910 University Avenue	691
San Diego Global Vision Academy TK-8	3430 School Street	386
ES = elementary school; MS = middle school; HS	= high school; K = kindergarten; TK =	transitional kindergarten.

Table 2-5. Kearny Cluster Details

		2018-2019
School	Address	Enrollment
Elementary Schools		
Angier ES	8450 Hurlburt Street	475
Carson ES	6905 Kramer Street	379
Chesterton ES	7335 Wheatley Street	448
Cubberley ES	3201 Marathon Drive	175
Fletcher ES	7666 Bobolink Way	163
Jones ES	2751 Greyling Drive	304
Juarez ES	2633 Melbourne Drive	275
Linda Vista ES	2772 Ulric Street	354
Ross ES	7470 Bagdad Street	211
Wegeforth ES	3443 Ediwhar Avenue	213
Middle Schools		
Montgomery MS	2470 Ulric Street	458
Taft MS	9191 Gramercy Drive	463

School	Address	2018-2019 Enrollment
High Schools		
Kearny HS Complex	1954 Komet Way	1,449
Atypical Schools		
San Diego Met HS	7250 Mesa College Drive	134
Twain HS	6402 Linda Vista Road	356
Charter Schools		
Elevate ES Serra Mesa Campus	2285 Murray Ridge Road	317
Empower K-6	2230 East Jewett Street	143
Kavod ES	3201 Marathon Drive	217
San Diego Cooperative	7260 Linda Vista Road	735
School for Entrepreneurship and Technology	3540 Aero Court	184
ES = elementary school; MS = middle school; HS = high school; K = kindergarten; TK = transitional kindergarten.		

Table 2-6. La Jolla Cluster Details

School	Address	2018-2019 Enrollment
Elementary Schools		
Bird Rock ES	5371 La Jolla Hermosa Avenue	449
La Jolla ES	1111 Marine Street	569
Torrey Pines ES	8350 Cliffridge Avenue	475
Middle Schools		
Muirlands MS	1056 Nautilus Street	925
High Schools		
La Jolla HS	750 Nautilus Street	1,410
ES = elementary school; MS = middle school; HS = high school; K = kindergarten; TK = transitional kindergarten.		

Table 2-7. Lincoln Cluster Details

	4.1.1	2018-2019
School	Address	Enrollment
Elementary Schools		
Baker ES	4041 T Street	432
Balboa ES	1844 S. 40th Street	523
Chavez ES	1404 S. 40th Street	504
Chollas/Mead ES	401 N. 45th Street	625
Encanto ES	822 65th Street	488
Horton ES	5050 Guymon Street	408
Johnson ES	1355 Kelton Road	313
Nye ES	981 Valencia Parkway	410

		2018-2019
School	Address	Enrollment
Porter ES	4800 T Street	843
Valencia Park ES	5880 Skyline Drive	541
Webster ES	4801 Elm Street	258
Middle Schools		
Knox MS	1098 S. 49th Street	641
Millennial Tech MS	1110 Carolina Lane	452
High Schools		
Lincoln HS	4777 Imperial Avenue	1,576
Charter Schools		
America's Finest	730 45 th Street	447
Gompers Prep	1005 47 th Street	1,318
Holly Drive Leadership Academy	4801 Elm Street	129
O'Farrell Community School	6130 Skyline Drive	1,155
ES = elementary school; MS = middle school;	HS = high school; K = kindergarten; TK	= transitional kindergarten.

Table 2-8. Madison Cluster Details

		2018-2019
School	Address	Enrollment
Elementary Schools		
Field ES	4375 Bannock Avenue	322
Hawthorne ES	4750 Lehrer Drive	263
Lafayette ES	6125 Printwood Way	323
Lindbergh/Schweitzer ES	4133 Mt. Albertine Avenue	385
Sequoia ES	4690 Limerick Avenue	190
Whitman ES	4050 Appleton Street	147
Middle Schools		
Innovation MS	5095 Arvinels Avenue	489
High Schools		
Madison HS	4833 Doliva Drive	975
Atypical Schools		
CPMA MS	5050 Conrad Avenue	942
ES = elementary school; MS = middle school; HS = high school; K = kindergarten; TK = transitional kindergarten.		

Table 2-9. Mira Mesa Cluster Details

School	Address	2018-2019 Enrollment
Elementary Schools		
Ericson ES	11174 Westonhill Drive	715
Hage ES	9750 Galvin Avenue	703
Hickman ES	10850 Montongo Street	425
Jonas Salk ES	7825 Flanders Drive	710
Mason ES	10340 San Ramon Drive	531
Sandburg ES	11230 Avenida del Gato	539
Walker ES	9225 Hillery Drive	400
Middle Schools		
Challenger MS	10810 Parkdale Avenue	947
Wangenheim MS	9230 Gold Coast Drive	917
High Schools		
Mira Mesa HS	10510 Marauder Way	2,411
Atypical Schools		
Twain Mesa HS	10444 Reagan Road	61
ES = elementary school; MS = middle sch	ool; HS = high school; K = kindergarten; T	K = transitional kindergarten.

Table 2-10. Mission Bay Cluster Details

School	Address	2018-19 Enrollment
Elementary Schools		
Crown Point Junior Music Academy	4033 Ingraham Street	314
Pacific Beach ES	1234 Tourmaline Street	387
Sessions ES	2150 Beryl Street	517
Middle Schools		
Pacific Beach MS	4676 Ingraham Street	747
High Schools		
Mission Bay HS	2475 Grand Avenue	1,121
Atypical Schools		
Barnard Asian Pacific Language Academy	2445 Fogg Street	518
ES = elementary school; MS = middle school; HS = high school; K = kindergarten; TK = transitional kindergarten.		

Table 2-11. Morse Cluster Details

School	Address	2018-2019 Enrollment
Elementary Schools		
Boone ES	7330 Brookhaven Road	440
Freese ES	8140 Greenlawn Drive	295
Pacific View Leadership ES	6196 Childs Avenue	279
Paradise Hills ES	5816 Alleghany Street	330
Penn ES	2797 Utica Drive	404
Perry ES	6290 Oriskany Road	382
Zamorano ES	2655 Casey Street	1,081
K-8 Schools		
Audubon K-8	8111 San Vincente Street	500
Bethune K-8	6835 Benjamin Holt Road	615
Fulton K-8	7055 Skyline Drive	332
Middle Schools		
Bell MS	620 Briarwood Road	707
High Schools		
Morse HS	6905 Skyline Drive	1,726
Atypical Schools		
San Diego School of Creative and Performing Arts 6-12	2425 Dusk Drive	1,435
Twain Morse HS	6905 Skyline Drive	86
Charter Schools		
Keiller Leadership Academy	7270 Lisbon Street	622
ES = elementary school; MS = middle school; HS = hi	igh school; K = kindergarten; TK = tı	ansitional kindergarten.

Table 2-12. Point Loma Cluster Details

School	Address	2018-2019 Enrollment
Elementary Schools		
Cabrillo ES	3120 Talbot Street	168
Dewey ES	3251 Rosecrans Street	378
Loma Portal ES	3341 Browning Street	391
Ocean Beach ES	4741 Santa Monica Avenue	410
Silver Gate ES	1499 Venice Street	510
Sunset View ES	4365 Hill Street	427
Middle Schools		
Correia MS	4302 Valeta Street	782
Dana MS	1775 Chatsworth Boulevard	754
High Schools		
Point Loma HS	2335 Chatsworth Boulevard	1,908

School	Address	2018-2019 Enrollment
Atypical Schools		
iHigh Virtual Academy ¹	3939 Conde Street	42
Charter Schools		
High Tech Elementary Explorer	2230 Truxtun Road	358
High Tech ES	2150 Cushing Road	403
High Tech MS	2359 Truxtun Road	321
High Tech Middle Media Arts	2230 Truxtun Road	328
High Tech HS	2861 Womble Road	527
High Tech High Media Arts	2230 Truxtun Road	390
High Tech High International	2855 Farragut Road	393
Old Town Academy ¹	2120 San Diego Avenue	250

 $^{^{1}}$ School located within the Dana/Correia-Roosevelt and Point Loma-San Diego Optional Area, and therefore are included in both cluster lists.

Table 2-13. San Diego Cluster Details

Calcal	A 3.1	2018-2019
School	Address	Enrollment
Elementary Schools		
Birney ES	4345 Campus Avenue	545
Burbank ES	2146 Julian Avenue	410
Emerson/Bandini ES	3510 Newton Avenue	424
Florence ES	3914 First Ave	338
Garfield ES	4487 Oregon Street	328
Jefferson ES	3770 Utah Street	423
Kimbrough ES	321 Hoitt Street	380
McKinley ES	3045 Felton Street	575
Rodriguez ES	825 S. 31st Street	449
Sherman ES	301 22nd Street	660
Washington ES	1789 State Street	329
K-8 Schools		
Golden Hill K-8	1240 33rd Street	404
Grant K-8	1425 Washington Place	724
Logan K-8	2875 Ocean View Boulevard	435
Perkins K-8	1770 Main Street	483
Middle Schools		
Memorial Prep MS	2850 Logan Avenue	419
Roosevelt MS	3366 Park Boulevard	989
High Schools		
San Diego HS Complex	1405 Park Boulevard	2,569

ES = elementary school; MS = middle school; HS = high school; K = kindergarten; TK = transitional kindergarten.

		2010 2010
School	Address	2018-2019 Enrollment
Atypical Schools		
ALBA 6-12	4041 Oregon Street	39
East Village HS	1425 Russ Boulevard	108
Garfield HS	1255 16th Street	282
iHigh Virtual Academy ¹	3939 Conde Street	42
Charter Schools		
Albert Einstein Academy ES	3035 Ash Street	800
Albert Einstein Academy MS	458 26th Street	599
E3 Civic High	395 11th Avenue	377
King-Chavez Arts, Athletics and Primary 3–5	415 31st Street	719
King-Chavez Academy of Excellence	2716 Marcy Avenue	291
King-Chavez Community HS	201 A Street	362
King-Chavez Preparatory Academy	500 30 th Street	368
Kipp Adelante Prep Academy	1475 6 th Avenue	327
McGill School of Success	3025 Fir Street	162
Museum School	211 Maple Street	239
Old Town Academy ¹	2120 San Diego Avenue	250
Urban Discovery Academy	840 14th Street	576

 $^{^{\}rm 1}$ School located within the Dana/Correia-Roosevelt and Point Loma-San Diego Optional Area, and therefore are included in both cluster lists.

Table 2-14. Scripps Ranch Cluster Details

School	Address	2018-2019 Enrollment
Elementary Schools		
Dingeman ES	11840 Scripps Creek Drive	769
E.B. Scripps ES	11778 Cypress Canyon Road	736
Jerabek ES	10050 Avenida Magnifica	657
Miramar Ranch ES	10770 Red Cedar Drive	705
Middle Schools		
Marshall MS	9700 Avenue of the Nations	1,491
High Schools		
Scripps Ranch HS	10410 Falcon Way	2,180
Charter Schools		
Innovations Academy K-8	10380 Spring Canyon Road	404
ES = elementary school; MS = middle school; HS = h	igh school; K = kindergarten.	

ES = elementary school; MS = middle school; HS = high school; K = kindergarten; TK = transitional kindergarten.

Table 2-15. Serra Cluster Details

School	Address	2018-2019 Enrollment
Elementary Schools		
Hancock ES	3303 Taussig Street	609
Kumeyaay ES	6475 Antigua Boulevard	464
Miller ES	4343 Shields Street	756
Tierrasanta ES	5450 La Cuenta Drive	515
Vista Grande ES	5606 Antigua Boulevard	384
Middle Schools		
De Portola MS	11010 Clairemont Mesa Boulevard	905
Farb MS	4880 La Cuenta Drive	476
High Schools		
Serra HS	5156 Santo Road	1,474
Charter Schools		
Elevate ES Tierrasanta Campus	5606 Antigua Boulevard	317
ES = elementary school; MS = middle school	; HS = high school; K = kindergarten; TK = transiti	onal kindergarten.

Table 2-16. University City Cluster Details

School	Address	2018-2019 Enrollment			
Elementary Schools					
Curie ES	4080 Governor Drive	584			
Doyle ES	3950 Berino Court	673			
Spreckels ES	6033 Stadium Street	656			
Middle Schools					
Standley MS	6298 Radcliffe Drive	1,013			
High Schools					
University City HS	6949 Genesee Avenue	1,845			
Charter Schools					
Preuss Charter	9500 Gilman Drive	837			
ES = elementary school; MS = middle school; HS = high school					

Proposed Program

The District is proposing the establishment and implementation of the Proposed Program to repair, renovate, and revitalize District schools and administrative facilities. The Proposed Program consists of eight project categories that represent typical capital improvement projects that could be implemented at any of the District's schools and administrative sites.

These projects consist of improvements identified in the 2008 Long-Range Facilities Master Plan and Propositions S, Z, and YY, as well as other potential projects not identified within existing documents

or specific bond measures. The eight categories are based on the anticipated project scope and type of construction. Physical impacts resulting from projects within these eight categories are analyzed in Chapter 3 of this IS.

- 1. New Acquisition and New School Construction
- 2. Whole Site Modernization
- 3. Upgrades of Existing School Sites
- 4. Joint-Use Facilities Development Including Fields, Pools, and Play all Day Program
- 5. Other Property Related Agreements Including Easements, License Agreements, and Joint Occupancy
- 6. Charter School Facilities, Acquisition, and Facility Improvements
- 7. Replacement, Renovation, Consolidation, and Repair of Administrative Facilities
- 8. Major Maintenance and Repair

Unless noted otherwise, all District projects are required to be designed in compliance with applicable federal, state, and local regulations and standards, including but not limited to the Americans with Disabilities Act (ADA), Title IX of the federal Education Amendments of 1972, Title 5 of the California Code of Regulations, Title 24 of the California Building Standards Code, and Collaborative for High Performance Schools (CHPS) standards.

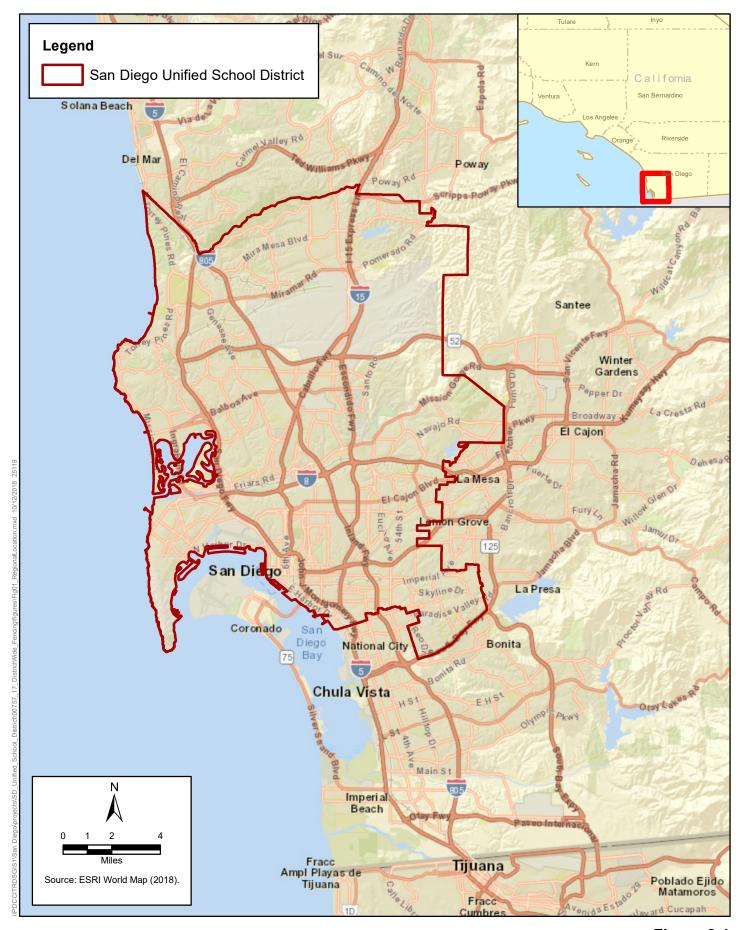
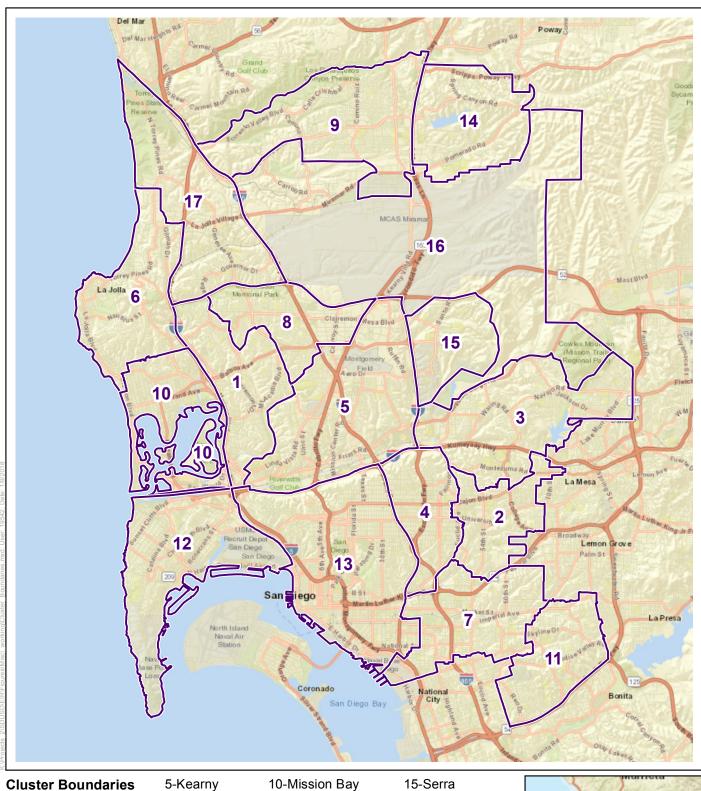


Figure 2-1 Regional Location Map Capital Improvement Program PEIR



Cluster Boundaries

5-Kearny 1-Clairemont 6-La Jolla 7-Lincoln 2-Crawford 8-Madison 3-Henry

9-Mira Mesa 4-Hoover

15-Serra

11-Morse

12-Point Loma

13-San Diego

14-Scripps Ranch

16-Unassigned

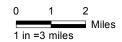
17-University City



Source: Imagery-ESRI Street Map (2018)







Environmental Checklist

1. Program Title: San Diego Unified School District Capital

Improvement Program

2. Lead Agency Name and Address:

San Diego Unified School District
Facilities Planning & Construction
4860 Ruffner Street, Annex Room 5

San Diego, CA 92111

3. Contact Person and Phone Number: Paul Garcia, CEQA Project Manager San Diego Unified School District

(858) 637-6290

4. Program Location: The program area encompasses the entire boundaries of the San Diego

Unified School District

San Diego, CA

Program Sponsor's Name and Address:

San Diego Unified School District
Facilities Planning & Construction
4860 Ruffner Street, Annex Room 5

San Diego, CA 92111

General Plan Designation: Varies per District siteZoning: Varies per District site

8. Description of Program: See Chapter 2, *Program Description*.

9. Surrounding Land Uses and Setting:

5.

10. Other Public Agencies Whose Approval May Be Required:

Varies per District site

Division of the State Architect, Department of Toxic Substances Control, Office of Public School Construction, California Department of Education, City of San Diego (offsite improvements)

Yes

11. 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 significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Note: Conducting consultation early in the CEQA process allows tribal governments and lead agencies to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (Public Resources Code Section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.

Environmental Factors Potentially Affected

The following checklist is used to evaluate the potential for significant environmental impacts caused by the Proposed Program. All responses must consider the project in its entirety and any actions involved (i.e., offsite as well as onsite impacts, cumulative as well as project-level impacts, indirect as well as direct impacts, and construction as well as operational impacts).

This checklist is adapted from the form provided in Appendix G of the State CEQA Guidelines. The checklist is modified as appropriate for this project. There are 21 CEQA subject categories to be considered, with this checklist organized as such. Each subject discussion includes an evaluation matrix, followed by a brief discussion explaining the evaluation rationale. As appropriate, each subject discussion may address more than one specific issue question if there is a salient interrelation.

The 21 CEQA subject categories—or environmental factors—that must be considered are presented below. Each category is scored according to the potential level of impact significance the Proposed Program may have on the environment. The levels of significance are indicated and described below.

- 3 = **Potentially Significant**: There is substantial evidence that an effect is significant.
- 2 = **Less than Significant with Mitigation**: Applies in situations where a "potentially significant" impact can be reduced to a "less than significant" level with the incorporation of an adequate and feasible mitigation measure(s).
- 1 = **Less than Significant**: This is an effect that is discernible but would not cause a lasting significant impact.
- 0 = **No Impact**: This is an adequate determination if the referenced information sources show that the impact simply does not apply to projects like the one involved.

3	Aesthetics	0	Agriculture and Forestry Resources	3	Air Quality
3	Biological Resources	3	Cultural Resources	3	Energy
3	Geology and Soils	3	Greenhouse Gas Emissions and Climate Change	3	Hazards and Hazardous Materials
3	Hydrology and Water Quality	3	Land Use and Planning	0	Mineral Resources
3	Noise and Vibration	0	Population and Housing	0	Public Services
3	Recreation	3	Transportation	3	Tribal Cultural Resources
3	Utilities and Service Systems	3	Wildfire	3	Mandatory Findings of Significance

Determination

On the basis of this initial evaluation: 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 to 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 an ENVIRONMENTAL IMPACT REPORT is required. ☐ I find that the proposed project MAY have an impact on the environment that is "potentially significant" or "potentially significant unless mitigated" 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. An ENVIRONMENTAL IMPACT REPORT is 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, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required. Signature Date Dave Koepcke San Diego Unified School District Printed Name For

I. A	esthetics	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
	cept as provided in Public Resources Code ction 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 along a scenic highway?				
c.	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
d.	Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?				

Impact Analysis

Would the project:

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

Potentially Significant Impact. A scenic vista is generally defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. There are numerous public areas within the program area that are considered scenic vistas, which provide views of the San Diego Bay (Bay), San Diego–Coronado Bay Bridge, the Pacific Ocean, Downtown San Diego, and other high-value viewpoints.

Construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program could include the addition of structures larger or taller than existing structures have the potential to obstruct scenic vistas. In addition, the acquisition and development of new school sites could add new structures to the surrounding area that obstruct scenic vistas. Therefore, the Proposed Program's potential to cause a substantial adverse change on a scenic vista would be potentially significant. Further analysis is warranted in the PEIR.

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

Potentially Significant Impact. Officially Designated State Scenic Highways within the City and County of San Diego include portions of State Route (SR-) 52, SR-75, SR-78, SR-125, and SR-163 (Caltrans 2017). SR-52 borders the Clairemont, Madison, Kearny, and Serra clusters to the north and

borders the University City cluster to the south. SR-75 is visible from the San Diego cluster. SR-163 travels through the San Diego and Kearny clusters. All of the District schools are in urbanized areas, which are characterized by residential, commercial, industrial, and recreational land uses.

Activities that would be reasonably foreseeable with implementation of the Proposed Program could result in damage to scenic resources along a scenic highway, such as the removal of trees or rock outcroppings, or demolition or alteration of historic buildings. Additionally, new school sites have the potential to be located along a scenic highway, and construction or operation activities associated with development of the new school site could damage scenic resources. Therefore, the impact on designated scenic highways and scenic resources would be potentially significant. Further analysis is warranted in the PEIR.

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

Potentially Significant Impact. The program area is characterized as an urbanized area consisting of residential, commercial, industrial, and recreational uses. The existing school sites are currently developed as operating school campuses. New school sites could be located on undeveloped parcels of land.

While it is anticipated that construction and operation activities on existing school sites that would be reasonably foreseeable with implementation of the Proposed Program would be consistent with the existing visual character, there is the potential for certain improvements to degrade the existing visual character of the surrounding neighborhoods. Additionally, the development of new schools may not be consistent with the visual character of the surrounding area. Therefore, impacts on the visual character or quality of the site or surrounding area would be potentially significant. Further analysis is warranted in the PEIR.

d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Potentially Significant Impact. The program area is located in an urbanized city with numerous existing sources of light and glare that are visible in the daytime and nighttime.

Reasonably foreseeable activities under the Proposed Program would potentially introduce new sources of light and/or glare that could adversely affect daytime or nighttime views surrounding existing school sites. For example, new school sites would require security lighting, and athletic fields could include stadium lighting. As such, the Proposed Program's potential to create new sources of substantial light or glare that could potentially affect daytime or nighttime views in the area would be a potentially significant impact. Therefore, further analysis is warranted in the PEIR.

II. Agriculture and Forestry Resources	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
In determining whether impacts on 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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project, the Forest Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources 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 non-agricultural use?				
b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?				\boxtimes
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 forest land or conversion of forest land to non-forest use?				\boxtimes
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?				

Impact Analysis

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 non-agricultural use?

No Impact. The District boundaries are entirely within the City of San Diego. All of the District schools are in urbanized areas where there are no farmlands or agricultural resources. According to the California Department of Conservation's San Diego County Important Farmland 2016 map, the program area is classified as "Urban and Built-Up Land" and "Other Land," which do not contain agricultural uses or areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation 2016). There is Farmland of Local Importance in the northern portion of the City, and there is a small area of Unique Farmland near MCAS Miramar Airport; however, both are outside of the project boundaries (City of San Diego 2007a). Any new schools acquired and developed would be sited in urbanized areas, as they would be intended to serve as neighborhood schools. As such, the Proposed Program would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use. Therefore, there would be no impact, and no further analysis is warranted in the PEIR.

b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?

No Impact. As discussed in item II.a, all of the schools within the District are in urbanized areas where there are no farmlands or agricultural resources. The Williamson Act applies to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland or at least 40 acres of land not designated as Prime Farmland. The purpose of the act is to preserve agriculture and open space lands by discouraging premature and unnecessary conversion to urban uses. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land for use as agricultural or related open space.

The program area is classified as "Urban and Built-Up Land" and "Other Land" by the California Department of Conservation (California Department of Conservation 2016). The program area is not zoned for agricultural use, nor are there Williamson Act contracts within the program area (California Department of Conservation 2013). Additionally, there are no Williamson Act contract eligible lands in the program area. Any new schools acquired and developed would be sited in urbanized areas, as they would be intended to serve as neighborhood schools. Therefore, the Proposed Program would not conflict with existing zoning for agricultural use or a Williamson Act contract. There would be no impact, and no further analysis is warranted in the PEIR.

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))?

No Impact. The District boundaries are entirely within the City of San Diego, which does not contain any forest land, timberland, or timberland zoned Timberland Production. All of the District schools are in urbanized areas where there are no forestry resources. Construction and operation activities that would be reasonably foreseeable with implementation of the Proposed Program would occur primarily at existing school and administrative facilities, which are classified as "Urban and Built-Up

Land" or "Other Land" and are not zoned as forest land, timberlands, or timberland zoned Timberland Production (California Department of Conservation 2016). In addition, any new schools acquired and developed would be sited in urbanized areas, as they would be intended to serve as neighborhood schools. The Proposed Program would not conflict with existing zoning for, or cause rezoning of, forest land or timberland resources. Therefore, there would be no impact, and no further analysis is warranted in the PEIR.

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

No Impact. As discussed in item II.c, the program area is a predominantly urbanized area where there are no farmlands or forest resources. Any new schools acquired and developed would be sited in urbanized areas, as they would be intended to serve as neighborhood schools. The program area is classified as "Urban and Built-Up Land" and "Other Land" and is not zoned as forest land, timberlands, or timberland zoned Timberland Production. As such, the Proposed Program would not result in a loss of forest land or conversion of forest land to non-forest uses. Therefore, there would be no impact, and no further analysis is warranted in the PEIR.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As detailed in items II.a through II.d, implementation of the Proposed Program would have no impact on agriculture and/or forestry resources. Improvements to District facilities that would be reasonably foreseeable with implementation of the Proposed Program would occur on sites containing existing school campuses and administrative facilities, in areas classified as "Urban and Built-Up Land" or "Other Land," which do not contain any agricultural uses or areas designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Furthermore, there are no Williamson Act contracts or forest lands in the program area (California Department of Conservation 2013). In addition, any new schools acquired and developed would be sited in urbanized areas, as they would be intended to serve as neighborhood schools. Implementation of the Proposed Program would not involve changes to the existing environment, which, due to their location and nature, would result in the conversion of Farmland to non-agricultural use or forest land to non-forest use. Therefore, there would be no impact, and no further analysis is warranted in the PEIR.

III.	Air Quality	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
esta ma: dist	en available, the significance criteria ablished by the applicable air quality nagement district or air pollution control trict may be relied upon to make the following erminations. Would the project:				
a.	Conflict with or obstruct implementation of the applicable air quality plan?	\boxtimes			
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard?				
c.	Expose sensitive receptors to substantial pollutant concentrations?	\boxtimes			
d.	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				

Impact Analysis

Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The District is in the San Diego Air Basin (SDAB), which is commensurate with San Diego County. The San Diego Air Pollution Control District (SDAPCD) is required, pursuant to the federal and state Clean Air Acts, to reduce emissions of criteria pollutants for which the SDAB is in nonattainment. The SDAB is currently classified as a moderate nonattainment area for the federal 8-hour ozone (O_3) standard and attainment for all other federal pollutants. In addition, the SDAB is classified as a nonattainment area for state O_3 , particulate matter (PM) less than 2.5 microns in diameter (PM2.5), and PM less than 10 microns in diameter (PM10) standards (San Diego Air Pollution Control District 2018).

All areas designated as nonattainment are required to prepare plans that show how the areas would meet the state and federal air quality standards by their attainment dates. The San Diego Regional Air Quality Strategy (RAQS) is the region's applicable air quality plan for improving air quality in the region and attaining federal and state air quality standards. The RAQS relies on information from the California Air Resources Board (CARB) and the San Diego Association of Governments (SANDAG), including projected growth in the county, which is based, in part, on information from local general plans. Generally, projects that propose development that is consistent with the land use designations and growth anticipated by the local general plan and SANDAG are consistent with the RAQS.

Various project types that would be reasonably foreseeable with implementation of the Proposed Program could increase enrollment within both existing and new schools. Construction of the various project elements would be required to comply with SDAPCD Rules and Regulations,

including Rules 50, 51, and 55, which forbid visible emissions, forbid nuisance activities, and require fugitive dust control measures, respectively. The acquisition and development of new schools may require land uses changes. In addition, construction and operation activities that would be reasonably foreseeable with implementation of the Proposed Program could occur at existing school sites over the short- and long-term. Both of these could result in a permanent increase in emissions, including motor vehicle trips, energy consumption, and other sources, compared to existing conditions. As such, because the Proposed Program could increase student enrollment in the region, which could result in enrollment and emissions that exceed existing general plan and SANDAG projections, the Proposed Program is considered potentially inconsistent with local general plans and/or SANDAG's growth projections. This is considered a potentially significant impact, and this issue area will be analyzed in the PEIR.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard?

Potentially Significant Impact. The District is in the SDAB, which is classified as a nonattainment area for certain federal and state designated criteria pollutants, including O_3 , PM10, and PM2.5. Construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program would generate emissions of criteria pollutants, including PM10, PM2.5, and O_3 precursors. These activities would potentially cause a cumulatively considerable net increase in criteria pollutants, including those for which the region is in nonattainment. Therefore, impacts be potentially significant, and further analysis will be provided in the PEIR.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive receptors are facilities and structures where people live or spend considerable amounts of time, including retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities. The people most affected by air pollution are typically children younger than 14, the elderly older than 65, athletes, and individuals with cardiovascular and chronic respiratory diseases. Because the majority of District schools are within residential neighborhoods, there are several sensitive receptors, including the school sites themselves, present throughout the program area that could be affected by construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program. As such, the Proposed Program has the potential to expose sensitive receptors to substantial pollutant concentrations, which would be a potentially significant impact. Therefore, further analysis will be provided in the PEIR.

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

Potentially Significant Impact. According to the *Air Quality and Land Use Handbook* (California Environmental Protection Agency/California Air Resources Board 2005), land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding facilities. The acquisition and development of new school facilities could feasibly occur within proximity to land uses that generate odors, including those mentioned above. Thus, the Proposed Program may expose or generate additional odors that may affect existing and new student uses, which would be a potentially significant impact. Therefore, further analysis will be provided in the PEIR.

IV.	Biological Resources	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	ould the project:				
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
C.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, 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 nursery 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?				

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?

Potentially Significant Impact. Existing school facilities within the program area contain ornamental vegetation that provides potentially suitable nesting habitat for migratory birds and raptors protected under the federal Migratory Bird Treaty Act (MBTA) and Sections 3503 and 3503.5 of the California Fish and Game Code, which prohibit the take or destruction of migratory birds and raptors, their nests, and/or eggs. Direct impacts on nesting birds protected by the MBTA

and similar provisions of the Fish and Game Code could occur if construction that would be reasonably foreseeable with implementation of the Proposed Program is conducted during the general avian breeding season (January 15 through August 31) and includes the removal of any ornamental trees containing active nests. In addition, the acquisition and development of new school sites could require the removal of existing vegetation or occur adjacent to vegetation that provides nesting bird habitat. A biological resources analysis will be prepared as part of the PEIR that will detail existing conditions and potential impacts from construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program. Therefore, impacts would be potentially significant, and further analysis is warranted in the PEIR.

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. The program area is within the boundaries of the City of San Diego, which contains riparian habitat and other sensitive natural communities that may potentially be inhabited by federally or state-listed biological species. Additionally, portions of the program area are adjacent to the Multi-Habitat Planning Area boundaries as designated in the City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan (City of San Diego 2007b). Construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program would potentially result in direct and/or indirect impacts on riparian habitat or other sensitive natural communities 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. In addition, the acquisition and development of new school sites could have potential impacts on riparian habitat or other sensitive natural communities. Therefore, impacts would be potentially significant and further analysis is warranted in the PEIR.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

Potentially Significant Impact. The program area consists predominantly of developed land in an urbanized area; however, portions of the program area contain wetlands. No state or federally protected wetlands are located on existing school or administration sites. However, there are multiple existing District sites adjacent to sensitive habitat, including wetlands. While, construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program would primarily occur within each of the existing campus footprints, there is a potential for impacts to occur due the presence of adjacent wetlands. Additionally, new school sites could be located on undeveloped parcels of land, some of which could contain or be adjacent to wetlands. Consequently, the acquisition and development of new school sites could occur in proximity to wetlands that could be impacted. As such, the Proposed Program would potentially affect state and federally protected wetlands, either directly or indirectly. Therefore, impacts would be potentially significant, and further analysis is warranted in the PEIR.

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

Potentially Significant Impact. Construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program would primarily occur within sites that

are completely developed as existing operating schools, which are either paved or graded, and contain buildings and other structures. As a result, the existing school sites are not considered migratory wildlife corridors or nursery sites and do not contain any streams or bodies of water that may be inhabited by any native resident or migratory fish species. However, as mentioned in item IV.a, existing school facilities within the program area contain ornamental vegetation that provides potentially suitable nesting habitat for migratory birds and raptors protected under the federal MBTA and similar sections of the California Fish and Game Code. As such, construction and operational activities at existing school sites could result in direct and indirect impacts on nesting birds. In addition, the acquisition and development of new school sites could require the removal of existing vegetation or occur adjacent to vegetation that provides nesting bird habitat. As such, the Proposed Program would potentially interfere with the movement of fish or wildlife and affect wildlife corridors. Therefore, impacts would be potentially significant, and further analysis is warranted in the PEIR.

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

Potentially Significant Impact. In the City of San Diego, local habitat, species, and biological resources are protected under the City of San Diego MSCP, which is implemented through the MSCP Subarea Plan. To implement its portion of the MSCP preserve, the City of San Diego developed the Multi-Habitat Planning Area (MHPA), which is considered an urban preserve that delineates core biological resource areas and corridors targeted for conservation. Additionally, the City's Environmentally Sensitive Lands Ordinance requires the overall protection of biological resources within the City and ensures implementation of the MSCP Subarea Plan.

While a majority of District facilities are within urbanized areas, several existing schools are adjacent to the MHPA. Additionally, new school sites could be acquired and developed, which could potentially be sited adjacent to the MHPA. The City's MHPA Land Use Adjacency Guidelines would be applicable for any activities at existing and new school sites located adjacent to the MHPA. As such, implementation of the Proposed Program would potentially conflict with one or more local policies or ordinances protecting biological resources. Therefore, impacts would be potentially significant, and further analysis is warranted in the PEIR.

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?

Potentially Significant Impact. As discussed in item IV.e, the program area is within the City of San Diego, which protects local habitat, species, and biological resources through implementation of its MSCP Subarea Plan. Several existing schools are adjacent to the MHPA, and there is a potential that new schools could also be sited adjacent to the MHPA. As such, implementation of the Proposed Program would potentially conflict with approved conservation plans. Therefore, impacts would be potentially significant and further analysis is warranted in the PEIR.

	C ultural Resources ould the project:	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?				
c.	Disturb any human remains, including those interred outside of formal cemeteries?				

Would the project:

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

Potentially Significant Impact. Due to the size of the program area, historic resources are potentially present. Existing school campuses may include structures that are more than 50 years old. Based on the age and character of these buildings, construction activities that would be reasonably foreseeable with implementation of the Proposed Program would potentially result in impacts on historical buildings. Therefore, impacts would be potentially significant, and further analysis is warranted in the PEIR.

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

Potentially Significant Impact. A records search at the South Coastal Information Center for archaeological resources will be conducted to determine the potential for resources to be uncovered during construction activities that would be reasonably foreseeable with implementation of the Proposed Program. Therefore, the PEIR will address the Proposed Program's potential to cause a substantial adverse change in the significance of an archaeological resource.

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

Potentially Significant Impact. As discussed in item V.b, a records search will be conducted for the program area to identify any potential cultural resources, including human remains that would be potentially disturbed as a result of construction activities that would be reasonably foreseeable with implementation of the Proposed Program. Therefore, the PEIR will address the Proposed Program's potential to disturb human remains.

	Energy ould the project:	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a.	Result in potentially significant environmental impacts 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?				

Would the project:

a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Potentially Significant Impact. Reasonably foreseeable activities associated with the Proposed Program would require the use of energy during construction and operation. Activities at existing school sites that would potentially increase student enrollment, such as whole site modernizations, would require additional energy compared to existing conditions. In addition, the construction of new school or administrative facilities would represent a new source of energy demand. These new or additional sources of energy use could be considered wasteful, inefficient, or unnecessary and could result in significant environmental impacts. Therefore, this impact would be potentially significant and further analysis is warranted in the PEIR.

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

Potentially Significant Impact. Applicable regulations and plans for renewable energy or energy efficiency include the state energy or green building code, renewable energy or energy efficiency goals in SANDAG's Regional Energy Strategy, and statewide renewable portfolio standards goals. Reasonably foreseeable activities associated with the Proposed Program would require the use of energy during construction and operation. Activities at existing school sites that would potentially increase student enrollment, such as whole site modernizations, would require additional energy compared to existing conditions. In addition, the construction of new school or administrative facilities would represent a new source of energy demand. There is a potential that these activities would conflict with regulations and/or plans that have been adopted at the state, regional, and local level for the purposes of increasing renewable energy usage and energy efficiency. Therefore, impacts would be potentially significant and further analysis is warranted in the PEIR.

VII	. Geology and Soils	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	uld the project:				
a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:		_	_	_
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
	ii. Strong seismic ground shaking?	\boxtimes			
	iii. Seismic-related ground failure, including liquefaction?				
	iv. Landslides?	\boxtimes			
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 an onsite or offsite 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 in areas where sewers are not available for the disposal of wastewater?				
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				

Would the project:

- a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
 - ii. Strong seismic ground shaking?
 - iii. Seismic-related ground failure, including liquefaction?
 - iv. Landslides?

Potentially Significant Impact. The program area is in a known seismically active region where several known earthquake faults exist. Active faults in the program area include the Rose Canyon Fault, and portions of the program area are within a State of California Earthquake Fault Zone (formerly known as an Alquist-Priolo Special Studies Zone) (City of San Diego 2008). A seismic event could cause significant ground shaking in the program area, and, while the potential for ground rupture due to faulting is considered low, lurching or cracking of the ground surface as a result of a nearby seismic event is possible. Additionally, the program area contains areas mapped as liquefaction or landslide hazard zones in the City of San Diego's Seismic Safety Study (City of San Diego 2008). Therefore, there is potential for liquefaction or landslides to occur.

Furthermore, due to the presence of known earthquake faults, construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program have the potential to directly or indirectly cause substantial adverse effects from seismic activities. Therefore, impacts are potentially significant, and further analysis is warranted in the PEIR.

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

Potentially Significant Impact. Soils mapped under existing school and administration sites vary in classification, and there are numerous soil types throughout the program area (U.S. Department of Agriculture 2012). These soils have likely been altered through cut and fill operations for previous development and therefore have a low potential for erosion within developed areas.

Construction activities that would be reasonably foreseeable with implementation of the Proposed Program would primarily occur within the previously disturbed areas of existing campuses, and therefore would not result in substantial soil erosion. However, there is a potential that new school sites could be acquired and developed, some of which may be currently undeveloped. As such, the Proposed Program would potentially result in substantial soil erosion or the loss of topsoil, and impacts would be potentially significant. Further analysis is warranted in the PEIR.

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

Potentially Significant Impact. As discussed in question VII.a, the program area contains areas mapped as a landslide or liquefaction hazard zone (City of San Diego 2008). As lateral spreading

occurs when there are liquefiable soils, there is a potential for lateral spreading to occur within the program area. In addition, there are numerous soil types throughout the program area, some of which may be unstable in their existing condition and could be exacerbated by activities that would be reasonably foreseeable with implementation of the Proposed Program. Therefore, impacts are potentially significant, and an analysis of the geologic units and soil types and their potential instability will be presented in the PEIR.

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?

Potentially Significant Impact. Expansive soils are fine-grained soils (generally, high-plasticity clays) that can undergo a significant increase in volume with an increase in water content or, conversely, a significant decrease in volume with a decrease in water content. Changes in the water content of an expansive soil can result in severe distress to structures built upon it. Although both expansive and liquefiable soil conditions are influenced by the presence of groundwater, soil expansion differs from soil liquefaction in that soil expansion is not seismically induced. Table 18-1-B of the Uniform Building Code provides a classification for expansive soils utilizing an expansion index and the associated potential for expansion. For example, an expansion index of 0–20 has a very low potential for expansion, while an expansion index of 91–130 has a high potential for expansion.

There is the potential for expansive soils to be located within the program area, as defined by Table 18-1-B of the Uniform Building Code. Both existing and potential future school and administrative sites are underlain by a variety of soil types, which may have shrink-swell potential. Therefore, impacts would be potentially significant, and further analysis is warranted in the PEIR.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?

No Impact. The entire program area is urbanized and uses the existing municipal sewer system for the disposal of wastewater. No septic tanks or alternative wastewater disposal systems are used at existing school sites, nor would new school sites rely on septic tanks. Therefore, there would be no impact, and no further analysis is warranted in the PEIR.

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

Potentially Significant Impact. The program area is within the Coastal Plain Province, which contains several rock formations. This province is underlain by a sequence of marine and non-marine sedimentary rock units that record portions of the last 140 million years of Earth's history. Over this period of time, ancient marine rocks were preserved up to elevations about 900 feet above sea level (City of San Diego 2007c). The program area is potentially underlain by geologic formations with moderate and high paleontological resource sensitivity. Construction activities that would be reasonably foreseeable with implementation of the Proposed Program may include excavation that could result in a potentially significant impact on paleontological resources. Therefore, the PEIR will address the Proposed Program's potential to cause significant impacts on paleontological resources.

	f. Greenhouse Gas Emissions and Climate	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wot	uld 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?				

Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. Construction and operation of future projects that would be reasonably foreseeable with implementation of the Proposed Program would have the potential to generate greenhouse gas (GHG) emissions. Consequently, the Proposed Program has the potential to directly or indirectly exceed an established threshold for GHG emissions. Therefore, the PEIR will address the Proposed Program's potential to generate GHG emissions that may have a significant effect on the environment.

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

Potentially Significant Impact. The City of San Diego adopted a Climate Action Plan in December 2015, which is the City's plan to reduce GHG emissions; however, the plan does not include emissions associated with District and school operations. Therefore, the most applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions are Assembly Bill (AB) 32 and Senate Bill (SB) 32, which codified the state's GHG emissions reduction targets for the future. Consistent with recent juridical and legislative action, this analysis also considers the long-range (2050) reduction target outlined in Executive Order (EO) S-3-05. Additionally, the analysis considers consistency with the District's "*Dream Big Ideas*," which were developed to support GHG reductions consistent with regional and statewide targets.

CARB adopted the AB 32 Scoping Plan as a framework for achieving AB 32. The Scoping Plan outlines a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions. These strategies are geared toward sectors and activities that generate significant amounts of GHGs. For example, the majority of measures address building energy, waste and wastewater generation, goods movement, on-road transportation, water usage, and high global warming potential gases. CARB furthered its efforts with SB 32 and recently finalized the Scoping Plan, which includes strategies for meeting the statewide 2030 target.

Activities that would be reasonably foreseeable with implementation of the Proposed Program could result in growth in enrollment that could generate emissions that may conflict with state, regional, or local plans, policies, or regulations adopted for the purpose of reducing emissions.

Therefore, the PEIR will address the Proposed Program's potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

IX.	Hazards and Hazardous Materials	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	uld the project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, 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 involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?				
d.	Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?				
e.	Be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport and 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?				

Would the project:

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

Less-than-Significant Impact. Construction that would be reasonably foreseeable with implementation of the Proposed Program would require the transport, use, and disposal of materials that are typically associated with construction activities, such as diesel fuels, hydraulic liquids, oils, solvents, and paints. This transport, use, and disposal of hazardous materials is regulated by federal, state, and local agencies and regulations, such as the U.S. Environmental Protection Agency's Resource Conservation and Recovery Act of 1976, the U.S. Department of Transportation's Hazardous Materials Regulations, and the San Diego County Department of Environmental Health's regulations.

Because schools are typically not considered a use that generates hazardous materials or hazardous waste, operation and maintenance of school and administrative facilities would not require the use of hazardous materials or generate hazardous waste. Compliance with existing hazardous materials regulations is mandatory; therefore, the Proposed Program would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, construction and operational impacts would be less than significant. No further analysis is warranted in the PEIR.

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

Potentially Significant Impact. A review of available existing environmental reports and online regulatory databases will be conducted as part of the hazardous materials assessments that are being prepared for the forthcoming PEIR. The database review will identify any locations of known hazardous waste sites, landfills, leaking underground storage tanks (USTs), permitted facilities that utilize USTs, and facilities that use, store, or dispose of hazardous materials/wastes. These sites could either be located on existing school campuses or administrative facilities or in the surrounding neighborhoods. In addition, new schools have the potential to be located on a hazardous waste site. As such, construction that would be reasonably foreseeable with implementation of the Proposed Program could result in a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials in the event contaminated media is encountered. Therefore, the PEIR will summarize this information and present an analysis of the Proposed Program's potential to create a significant hazard to the public or the environment.

c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Less-than-Significant Impact. As mentioned previously, construction that would be reasonably foreseeable with implementation of the Proposed Program would require the use of typical materials associated with construction activities (e.g., diesel fuel, gasoline, oil, hydraulic fluid, engine exhaust, solvent for welding PVC, and paint). Any hazardous materials used during construction would be transported, used, and stored in accordance with state and federal regulations regarding hazardous materials, as noted in item IX.a.

Schools are typically not considered a use that generates hazardous materials or hazardous waste. As such, the school sites are not anticipated to be a source of hazardous emissions or involve the handling of hazardous or acutely hazardous materials, substances, or waste. In addition, all schools and administration facilities are required to comply with existing state and federal regulations regarding hazardous materials. Therefore, the Proposed Program would not emit hazardous emissions or involve the handling of hazardous or acutely hazardous materials, substances, or waste on the existing school site or within 0.25 mile of an existing or proposed school. Construction and operational impacts would be less than significant. No further analysis is warranted in the PEIR.

d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?

Potentially Significant Impact. A review of available existing environmental reports and online regulatory databases will be conducted as part of the hazardous materials assessments that are being prepared for the forthcoming PEIR. The PEIR will summarize this information and present an analysis of the Proposed Program's potential to create a significant hazard to the public or the environment.

e. For a project within 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 result in a safety hazard or excessive noise for people residing or working in the project area?

Potentially Significant Impact. San Diego International Airport (SDIA), Marine Corps Air Station (MCAS) Miramar Airport, and Montgomery Field are located within the program area. In addition, the program area is within Review Areas 1 and 2 of the Airport Influence Area for each of these airports (Airport Land Use Commission 2008, 2010, 2014). Each of these airports has an Airport Land Use Compatibility Plan (ALUCP) with which future District capital improvement projects would be required to comply. The basic function of an ALUCP is to promote compatibility between airports and the land uses that surround them "to the extent that these areas are not already devoted to incompatible uses" (California Public Utilities Code Section 21674(a)).

Construction activities that would be reasonably foreseeable with implementation of the Proposed Program could include the use of large pieces of construction equipment, such as cranes, or the construction of multi-story buildings or other structures that are taller than existing structures within a project site. These activities have the potential to conflict with the applicable ALUCPs, as well as Federal Aviation Administration requirements under Federal Aviation Regulations Part 77. In addition, according to the ALUCPs for each of these airports, several existing school facilities are located within noise exposure contours, which means that exterior noise levels from aeronautical operations would, at a minimum, exceed 60 decibels (dB) community noise equivalent level (CNEL) (Airport Land Use Commission 2008, 2010, 2014). Also, new schools could be acquired and developed, which would potentially be located within the noise exposure contours of the aforementioned airports. Therefore, a potentially significant impact could occur, and further analysis is warranted in the PEIR.

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

Less-than-Significant Impact. Emergency management services are overseen by the San Diego Fire-Rescue Department, which responds to emergencies such as earthquakes, floods, and terrorist acts. In addition, the District maintains a Natural Hazards Mitigation Plan that addresses issues related to multiple hazards, including earthquakes, floods, wildfires, landslides, and tsunamis. Furthermore, the County of San Diego's Emergency Operations Plan describes a comprehensive emergency management system which provides for a planned response to any emergency associated with natural disasters, technological incidents, terrorism and nuclear-related incidents.

Construction activities that would be reasonably foreseeable with implementation of the Proposed Program would have the potential to temporarily restrict access for emergency vehicles traveling to and around the school sites. However, construction would be required to comply with the County of

San Diego's Emergency Operations Plan, and it is anticipated that construction would not result in the full closure of roadways or other means of emergency access. New operations associated with future District capital improvement projects would not change the existing site access in a way that would impair or interfere with implementation of adopted emergency response plans or evacuation plans. As such, implementation of the Proposed Program would not impair or physically interfere with an emergency response, and impacts would be less than significant. No further analysis is warranted in the PEIR.

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

Potentially Significant Impact. The City of San Diego is subject to both wildland and urban fires because of its climate, topography, and native vegetation (City of San Diego 2008). The extended drought characteristic of the region's Mediterranean climate and increasingly severe dry periods associated with global warming result in large areas of dry native vegetation that provide fuel for wildland fires. State law requires all local jurisdictions to identify any Very High Fire Hazard Severity Zone (VHFHSZ) within their areas of responsibility (California Government Code Sections 51175–51189). Inclusion within these zones is based on vegetation density, slope severity, and other relevant factors that contribute to fire severity.

According to the VHFHSZ maps prepared by the City in collaboration with the California Department of Forestry and Fire Protection, portions of the program area contain or are adjacent to areas that have been identified as a VHFHSZ and 300-foot brush buffer area (City of San Diego 2009). The Proposed Program would not change the current use of any existing school sites; however, enrollment at existing schools could potentially increase from construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program. In addition, there is a potential that new school sites could be acquired and developed, which could be sited within or adjacent to wildland fire hazard areas (i.e., areas designated as VHFHSZ). Therefore, impacts would be potentially significant and further analysis is warranted in the PEIR.

		Potentially Significant	Less-than- Significant Impact with Mitigation	Less-than- Significant	No
X. H	ydrology and Water Quality	Impact	Incorporated	Impact	Impact
Wou	ıld the project:		_		_
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?		Ц		
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 of a stream or river or through the addition of impervious surfaces, in a manner that would:				
	i. Result in substantial erosion or siltation on-site or off-site?				
	ii. Substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite?				
	iii. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				
	iv. Impede or redirect flood flows?			\boxtimes	
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?				

Would the project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Potentially Significant Impact. Construction activities that would be reasonably foreseeable with implementation of the Proposed Program have the potential to increase erosion and result in delivery of sediment to surface waters and storm drains near existing and potential future school sites and administrative facilities. During operations, stormwater contaminants could be generated that would negatively affect receiving water bodies.

Therefore, the Proposed Program could violate water quality standards or waste discharge requirements, and further analysis is warranted in the PEIR.

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

Potentially Significant Impact. The program area is within an established urban community serviced by the City of San Diego Public Utilities Department, and it is not anticipated that groundwater would be used during construction or operational activities that would be reasonably foreseeable with implementation of the Proposed Program. However, future District capital improvement projects could result in the expansion of impervious areas, which could interfere with groundwater recharge. Therefore, the Proposed Program could result in potentially significant impacts, and further analysis is warranted in the PEIR.

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:
 - i. Result in substantial erosion or siltation on-site or off-site?

Potentially Significant Impact. Future projects that would be reasonably foreseeable with implementation of the Proposed Program would have the potential to result in the alteration of drainage patterns and increased erosion/siltation, primarily due to the potential addition of impervious surfaces or substantial earth-moving activities. Impacts would be potentially significant, and further analysis is warranted in the PEIR.

ii. Substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite?

Potentially Significant Impact. Future projects that would be reasonably foreseeable with implementation of the Proposed Program would have the potential to result in the alteration of drainage patterns and increase flooding, primarily due to the potential addition of new impervious surfaces. Therefore, further analysis is warranted in the PEIR.

iii. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Potentially Significant Impact. Future projects that would be reasonably foreseeable with implementation of the Proposed Program would have the potential to increase the amount of runoff. The potential addition of impervious surfaces could add runoff water to the existing stormwater drainage system and exceed its capacity during operations. Additionally, construction activities have the potential to result in polluted runoff. Therefore, further analysis is warranted in the PEIR.

iv. Impede or redirect flood flows?

Less-than-Significant Impact. The program area includes several portions of the 100-year floodplain, as designated on Flood Insurance Rate Maps (Federal Emergency Management Agency 2012). Future projects that would be reasonably foreseeable with implementation of the Proposed Program would occur primarily within the boundaries of existing school sites. While there is a potential that new school sites could be acquired and developed, any new schools

would be sited in urbanized areas, as they would serve existing neighborhoods, and not within mapped floodplains. As such, the Proposed Program would not place structures within a 100-year flood hazard area that would impede or redirect flood flows. Therefore, impacts would be less than significant, and no further analysis is warranted in the PEIR.

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

Less-than-Significant Impact. As discussed above under question X.c.iv, the Proposed Program would not place structures within a 100-year flood hazard area, and therefore would not risk the release of pollutants due to project inundation.

A seiche is a standing wave in a completely or partially enclosed body of water, and areas along the shoreline of a lake or reservoir are susceptible to inundation by a seiche. The main lakes or reservoirs within the program area are Lake Miramar and Lake Murray. Existing school campuses are not adjacent to any lakes or reservoirs and therefore are not at risk for inundation by a seiche. While there is a potential that new school sites could be acquired and developed, much of the land surrounding Lake Miramar and Lake Murray is currently developed and unlikely to offer space for a new school. The closest water bodies are the San Diego Bay, Mission Bay, and the Pacific Ocean. No existing school campuses are within tsunami inundation areas (California Department of Conservation 2009a, 2009b, 2009c).

Therefore, the Proposed Program would not risk the release of pollutants due to project inundation within a flood hazard, tsunami, or seiche zone. Impacts would be less than significant, and no further analysis is warranted in the PEIR.

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

Potentially Significant Impact. As discussed above under question X.a, construction activities that would be reasonably foreseeable with implementation of the Proposed Program have the potential to increase erosion and result in delivery of sediment to surface waters and storm drains near existing and potential future school sites and administrative facilities. During operations, stormwater contaminants could be generated that would negatively affect receiving water bodies. The discharge of these contaminants to water bodies within the program area could exceed water quality standards and conflict with or obstruct implementation of a water quality control plan. Therefore, impacts would be potentially significant and further analysis is warranted in the PEIR. It should be noted that no sustainable groundwater management plans have been adopted to date.

XI.	Land Use and Planning	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	ould the project:				
a.	Physically divide an established community?				\boxtimes
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?				

Would the project:

a. Physically divide an established community?

No Impact. Development that would be reasonably foreseeable with implementation of the Proposed Program would primarily occur within the boundaries of existing school sites, which are already established within their respective communities. If new school sites are acquired and developed, these new schools would provide a needed service to the established community. Therefore, the Proposed Program would not physically divide an established community, there would be no impacts, and no further analysis is warranted in the PEIR.

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?

Potentially Significant Impact. Development within existing school sites that would be reasonably foreseeable with implementation of the Proposed Program would not result in any changes to the current land uses, as the schools would still function as educational facilities. If new school sites are acquired and developed, these new schools would be consistent with applicable land use plans, policies, and regulations.

Additionally, Government Code Section 53094 authorizes the governing board of a school district, by two-thirds vote, to render a city and county land use and zoning ordinance inapplicable to the proposed use of a certain property for educational purposes. Therefore, the District is not bound by local land use and zoning requirements consistent with Government Code Section 53094. However, administrative facilities or other non-educational facilities owned by the District would not be exempt from city and county land use and zoning ordinances. Therefore, certain project types under the Proposed Program would potentially conflict with land use plans, policies, or regulations in a manner that could cause significant environmental effects. Therefore, impacts would be potentially significant, and further analysis will be provided in the *Land Use* section of the PEIR.

	. Mineral Resources ould the project:	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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 that has been delineated on a local general plan, specific plan, or other land use plan?				

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?

No Impact. The Surface Mining and Reclamation Act of 1975 required the State Geologist to initiate mineral land classification to help identify and protect mineral resources in areas within the state. In accordance with guidelines established by the State Mining and Geology Board, mineral deposits in western San Diego County have been classified into Mineral Resource Zones (MRZs). According to the Conservation Element of the City of San Diego's General Plan (City of San Diego 2008), portions of the program area are mapped as MRZ-2, indicating that adequate information exists that significant mineral deposits are present or there is a high likelihood for their presence (County of San Diego 2011). However, no mineral resource extraction or other mining operations currently occur within or adjacent to existing school sites. In addition, the District does not intend to remove any existing school campuses; therefore, the sites would not be available for mineral extraction activities in the future. Furthermore, any new schools would be sited in urbanized areas, as they would serve as neighborhood schools, and not within or adjacent to areas suitable for mineral resource extraction or other mining operations. As such, the Proposed Program would not result in the loss of availability of known mineral resources that would be of value to the region and the residents of the state. Therefore, there would be no impact, and no further analysis is warranted in the PEIR.

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

No Impact. As discussed in item XII.a, construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program would not result in the loss of availability of a locally important mineral resource recovery site. There would be no impact, and no further analysis is warranted in the PEIR.

XII	I. Noise and Vibration	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	ould the project:				
a.	Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?				
b.	Result in the generation of excessive ground- borne vibration or ground-borne noise levels?	\boxtimes			
C.	Be located within the vicinity of a private airstrip or an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels?				

Would the project:

a. Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?

Potentially Significant Impact. The relevant noise standards for the Proposed Program would be those provided in the City of San Diego Noise Ordinance, which is detailed in Chapter 5, Article 9.5 of the City's Municipal Code. Construction and/or operational activities that would be reasonably foreseeable with implementation of the Proposed Program would generate a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of allowable levels. Impacts would be potentially significant, and further analysis is warranted in the PEIR.

b. Result in the generation of excessive ground-borne vibration or ground-borne noise levels?

Potentially Significant Impact. Construction activities that would be reasonably foreseeable with implementation of the Proposed Program would have the potential to generate excessive groundborne vibration or groundborne noise in excess of standards. Impacts would be potentially significant, and further analysis is warranted in the PEIR.

c. Be located within the vicinity of a private airstrip or an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels?

Potentially Significant Impact. There are no private airstrips within the program area (City of San Diego 2008). Therefore, there would be no impact associated with noise from private airstrips, and no further analysis is warranted in the PEIR.

SDIA, MCAS Miramar, and Montgomery Field are public airports located within the program area. According to the ALUCPs for each of these airports, several existing school facilities are located within noise exposure contours, which means that exterior noise levels from aeronautical operations would, at a minimum, exceed 60 decibels (dB) community noise equivalent level (CNEL) (Airport Land Use Commission 2008, 2010, 2014). Also, new schools could be acquired and developed, which would potentially be located within the noise exposure contours of the aforementioned airports. Therefore, impacts are potentially significant, and further analysis is warranted in the PEIR.

XIV. Population and Housing	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project: a. Induce substantial unplanned populat growth in an area, either directly (e.g., proposing new homes and businesses indirectly (e.g., through extension of roother infrastructure)?	by or			
b. Displace a substantial number of exist people or housing units, necessitating construction of replacement housing elsewhere?				

Would the project:

a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?

No Impact. The Proposed Program would not facilitate the construction of any homes or businesses or extension of roads or other infrastructure. Repair, renovation, or revitalization of existing school and administration facilities, or the construction of a new school, would be conducted to accommodate existing growth in the region and would not induce unplanned population growth.

Development activities that would be reasonably foreseeable with implementation of the Proposed Program would result in the generation of temporary construction jobs; however, the additional jobs are expected to be filled by individuals currently residing in the San Diego region. The jobs would not result in the relocation of any population. Therefore, the Proposed Program would not directly or indirectly induce substantial unplanned population growth through the creation of new homes or businesses in the San Diego region. There would be no impact, and no further analysis is warranted in the PEIR.

b. Displace a substantial number of existing people or housing units, necessitating the construction of replacement housing elsewhere?

No Impact. The program area is entirely within the boundaries of the City of San Diego, and most existing schools are in built out, urbanized areas. Existing school sites are developed and do not contain any housing units, and new school sites would not displace existing people or housing units. Therefore, the Proposed Program would not require the construction of replacement housing elsewhere. There would be no impact, and no further analysis is warranted in the PEIR.

XV. Public Services	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a 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:				
1. Fire protection?				\boxtimes
2. Police protection?				\boxtimes
3. Schools?				\boxtimes
4. Parks?				\boxtimes
5. Other public facilities?				\boxtimes

Would the project:

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a 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: fire protection, police protection, schools, parks, or other public facilities?

No Impact. Fire protection services within the program area are currently provided by the San Diego Fire-Rescue Department, and the San Diego Police Department provides police protection services in the City. Numerous parks and other public facilities are located throughout the program area, and the Proposed Program itself is associated with schools and related educational facilities.

Construction and operational activities at existing and new school sites that would be reasonably foreseeable with implementation of the Proposed Program would not affect fire protection, police protection, schools, parks, or other public facilities because they would accommodate anticipated growth, and not induce unexpected population growth. As such, no additional public services would be required with the Proposed Program. There would be no impacts, and no further analysis is warranted in the PEIR.

XV	T. Recreation	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
b.	Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				

Would the project:

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less-than-Significant Impact. An increase in the use of existing parks and recreational facilities typically results from an increase in the number of housing units or residents in an area. The Proposed Program would not increase the number of housing units or residents within the program area because it would accommodate existing growth, and not induce population growth. Additionally, due to the built-out, urbanized nature of the program area, it is unlikely that future projects that would be reasonably foreseeable with implementation of the Proposed Program would spur population growth that could increase the usage of any offsite park or recreational facilities. As such, the Proposed Program would not increase the use of other existing recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. Therefore, impacts would be less than significant, and no further analysis is warranted in the PEIR.

b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Potentially Significant Impact. Construction and operation of some recreational facilities that would be reasonably foreseeable with implementation of the Proposed Program would be available for community use as well as the schools. The construction and operation of these new or expanded recreational facilities may have an adverse physical effect on the environment. Therefore, impacts would be potentially significant, and further analysis is warranted in the PEIR.

	II. Transportation	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
wo a.	uld the project: Conflict with a program, plan, ordinance, or policy addressing the circulation system,	\boxtimes			
	including transit, roadway, bicycle and pedestrian facilities?				
b.	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				
C.	Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
d.	Result in inadequate emergency access?	\boxtimes			

Would the project:

a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Potentially Significant Impact. Applicable plans, ordinances, and policies for the Proposed Program include San Diego Forward: The Regional Plan (SANDAG 2015), the City of San Diego's Traffic Impact Study Manual (1998), and the City of San Diego's Street Design Manual (2002). These plans respectively establish a blueprint for the region's growth and development, provide thresholds for acceptable roadway and intersection operations, and provide guidance for the design of public right-of-way that accommodates a variety of potential users, including motorists, pedestrians, and bicyclists. The City has also produced bicycle and pedestrian master plans that provide guidelines related to multi-modal improvements.

Construction and operation that would be reasonably foreseeable with implementation of the Proposed Program could potentially increase vehicular traffic and conflict with adopted local programs, plans, ordinances, or policies that address the circulation system, including public transit, roadway, bicycle and pedestrian facilities. Therefore, a transportation impact analysis will be prepared for the Proposed Program. Impacts are potentially significant, and further analysis is warranted in the PEIR.

b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Potentially Significant Impact.

Construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program could generate vehicle miles traveled and potentially conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Therefore, impacts are potentially significant, and further analysis is warranted in the PEIR.

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

Potentially Significant Impact. Activities at existing and new school sites that would be reasonably foreseeable with implementation of the Proposed Program could include new geometric design features or new uses that would have the potential to substantially increase hazards. Therefore, impacts are potentially significant, and further analysis is warranted in the PEIR.

d. Result in inadequate emergency access?

Potentially Significant Impact. Construction activities that would be reasonably foreseeable with implementation of the Proposed Program would have the potential to temporarily restrict access for emergency vehicles traveling to and around the school sites. Additionally, future District capital improvement projects could change the existing site plans of existing schools in a way that could result in inadequate emergency access. Therefore, impacts are potentially significant, and further analysis is warranted in the PEIR.

XV	III. Tribal Cultural Resources	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
cha res Sec lan the	and the project cause a substantial adverse ange in the significance of a tribal cultural ource, defined in Public Resources Code ation 21074 as a site, feature, place, cultural dscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native perican tribe and:				
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) of 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.				

Would the project:

Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or an object with cultural value to a California Native American tribe and:

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)?

Potentially Significant Impact. A records search at the South Coast Information Center will be conducted to determine if tribal cultural resources are present within the Program area. The Native American Heritage Commission will also be contacted to determine if sacred lands have been identified within the program area. Impacts are potentially significant, and further analysis is warranted in the PEIR.

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code 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.

Potentially Significant Impact. Pursuant to Public Resources Code Section 21080.3.1 (AB 52), California Native American Tribes traditionally and culturally affiliated with a program area can request notification of projects in their traditional cultural territory. In this instance, the Jamul Indian Village requested AB 52 consultation with the District. Construction activities that would be reasonably foreseeable with implementation of the Proposed Program have the potential to result in significant impacts on tribal cultural resources. Consequently, consultation must be completed for the Proposed Program. The District has agreed that the Jamul Indian Village will be included on the mailing list for all future project documents. Through ongoing consultation between the District and the Jamul Indian Village, the tribe has indicated areas sensitive for tribal cultural resources within the District's jurisdiction. If the tribe indicates that a future District capital improvement project is sensitive for or contains a tribal cultural resource, the District will consult with the tribe regarding evaluation and treatment. Impacts are potentially significant, and further analysis is warranted in the PEIR.

XIX	. Utilities and Service Systems	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	uld the project:				_
a.	Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction 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 that 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?				
е.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				

Would the project:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. During reasonably foreseeable construction activities at existing and new school sites, excavation activities and exposed soil have the potential to temporarily increase the amount of suspended soils (sediment) in sheet flow or runoff that would enter the existing storm drain system during a rain event. Stormwater best management practices would be implemented to limit erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. Therefore, construction activities would not require construction of new stormwater drainage facilities or expansion of existing facilities.

Activities at existing schools and the acquisition and development of new schools would potentially result in changes to impervious surfaces. Therefore, alteration of the existing drainage patterns could occur, which would have the potential to substantially increase the rate or amount of surface runoff in a manner that would result in the need for new stormwater drainage facilities. In addition,

activities at existing schools that would increase enrollment and the acquisition and development of new schools would represent a new source of wastewater generation, water use, and utility use (i.e., electricity, natural gas, and telecommunications). Furthermore, new schools could be constructed on undeveloped land without utility facilities, or on developed sites that would require relocation or modifications to existing utility facilities. As such, activities that would be reasonably foreseeable with implementation of the Proposed Program would potentially require relocation or construction of new or expanded water, wastewater, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could result in significant environmental impacts. Impacts would be potentially significant, and further analysis is warranted in the PEIR.

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

Potentially Significant Impact. A number of activities that would be reasonably foreseeable with implementation of the Proposed Program would not increase employees, student capacity, or operation of existing facilities, and therefore would not substantially increase water use compared to existing conditions. However, some reasonably foreseeable activities under the Proposed Program, such as a whole site modernization, could increase student enrollment or result in other modifications to existing school operations that would necessitate greater demand for water. Additionally, the acquisition and development of new schools would potentially result in increased water use. Therefore, the demand for water could increase above what currently exists at the sites. Impacts on water supplies would be potentially significant, and further analysis is warranted in the PEIR.

c. Result in a determination by the wastewater treatment provider that 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?

Potentially Significant Impact. Existing school sites are currently serviced by the City of San Diego's Metropolitan Sewerage System and are included in the City's service population. A number of activities that would be reasonably foreseeable with implementation of the Proposed Program would not result in an increase in student enrollment or modifications to existing school operations that could necessitate greater demand for wastewater treatment. Therefore, wastewater treatment requirements would not be exceeded by these activities. However, some reasonably foreseeable activities under the Proposed Program, such as a whole site modernization, could increase student enrollment or result in other modifications to existing school operations that would necessitate greater demand for wastewater treatment. In addition, the acquisition and development of new schools would generate wastewater that could potentially exceed wastewater treatment capacity. Therefore, impacts are potentially significant, and further analysis is warranted in the PEIR.

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?

Potentially Significant Impact. Construction activities that would be reasonably foreseeable with implementation of the Proposed Program would generate both recyclable and non-recyclable waste. All non-recyclable solid waste generated during construction would be taken to one of the four San Diego County landfills identified above. In accordance with the City's Construction and Demolition Debris Deposit Ordinance, at least 65% of the remaining construction and demolition debris would be recycled either on site or at local recycling facilities. However, construction activities could still generate solid waste that would exceed landfill capacity.

A number of activities that would be reasonably foreseeable with implementation of the Proposed Program would not increase employees, student capacity, or operation of existing facilities, and therefore would not substantially increase solid waste generation compared to existing conditions. However, some reasonably foreseeable activities under the Proposed Program, such as a whole site modernization, could increase student enrollment or result in other modifications to existing school operations that would generate additional solid waste. Additionally, the acquisition and development of new schools could result in a substantial new source of solid waste generation within the City's service area. Therefore, impacts would be potentially significant, and further analysis is warranted in the PEIR.

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

Potentially Significant Impact. AB 939 established the California Integrated Waste Management Board, the State agency designated to oversee, manage, and track California's solid waste generation each year. In order to further the goals of AB 939, statewide strategies to achieve a 75% reduction goal by 2020 were established with the adoption of AB 341 in May 2012, the main component of which implemented mandatory commercial recycling by certain businesses and public entities. Local regulations include the City of San Diego Construction and Demolition Debris Deposit Ordinance, as described above.

As described in item XIX.d, non-recyclable solid waste generated during construction activities that would be reasonably foreseeable with implementation of the Proposed Program would be taken to a landfill with sufficient permitted capacity, while recyclable construction and demolition debris would be recycled in accordance with the City's Construction and Demolition Debris Deposit Ordinance. However, construction activities could still generate solid waste that would exceed landfill capacity.

A number of activities that would be reasonably foreseeable with implementation of the Proposed Program would not increase employees, student capacity, or operation of existing facilities, and therefore would not substantially increase solid waste generation compared to existing conditions. However, some reasonably foreseeable activities under the Proposed Program, such as a whole site modernization, could increase student enrollment or result in other modifications to existing school operations that would generate additional solid waste. Additionally, the acquisition and development of new schools could generate solid waste that would potentially conflict with existing solid waste regulations. Therefore, impacts would be potentially significant, and further analysis is warranted in the PEIR.

XX	. Wildfire	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
lan	ocated in or near state responsibility areas or ds classified as very high fire hazard severity nes, would the project:				
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?			\boxtimes	
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 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 wildfire 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?				

State law requires all local jurisdictions to identify any VHFHSZ within their areas of responsibility (California Government Code Sections 51175–51189). Inclusion within these zones is based on vegetation density, slope severity, and other relevant factors that contribute to fire severity. According to the VHFHSZ maps prepared by the City in collaboration with the California Department of Forestry and Fire Protection, portions of the program area contain or are adjacent to areas that have been identified as a VHFHSZ and 300-foot brush buffer area (City of San Diego 2009).

Impact Analysis

Would the project:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less-than-Significant Impact. Emergency management services are overseen by the San Diego Fire-Rescue Department, which responds to emergencies such as earthquakes, floods, and terrorist acts. In addition, the District maintains a Natural Hazards Mitigation Plan that addresses issues related to multiple hazards, including earthquakes, floods, wildfires, landslides, and tsunamis. Furthermore, the County of San Diego's Emergency Operations Plan describes a comprehensive emergency management system that provides for a planned response to any emergency associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. Annex Q, *Evacuation*, of the Emergency Operations Plan identifies wildfires as the most likely of six hazards that could affect the San Diego operational area and require evacuation of several communities (the other five are dam failure, earthquake, flooding, tsunami, and terrorism). This part of the Emergency

Operations Plan identifies basic protocols that dictate who is responsible for an evacuation effort and how regional resources will be requested and coordinated.

Construction activities that would be reasonably foreseeable with implementation of the Proposed Program would have the potential to temporarily restrict access for emergency vehicles traveling to and around the school sites. However, it is not anticipated that construction would result in the full closure of roadways or other means of emergency access that could substantially impair emergency evacuation in the event of a wildfire. New operations associated with future District capital improvement projects would not change the existing site access in a way that would impair or interfere with implementation of adopted emergency response plans or evacuation plans. As such, implementation of the Proposed Program would not impair or physically interfere with an emergency response, and impacts would be less than significant. No further analysis is warranted in the PEIR.

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 wildfire?

Potentially Significant Impact. Several existing school sites are adjacent to canyons with steep slopes, many of which are designated as a VHFHSZ. Reasonably foreseeable activities within or adjacent to areas designated as VHFHSZ have the potential to exacerbate wildfire risk, particularly if it occurs in areas with steep topography and/or prevailing winds as these conditions contribute to the spread of wildfires and make it more difficult to contain wildfires. The Proposed Program would not change the current use of any existing school sites; however, enrollment at existing schools could potentially increase from construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program. Because most wildfires are caused by humans, these increases in student enrollment could exacerbate the potential for wildfire risks. In addition, there is a potential that new school sites could be acquired and developed, which could be sited adjacent to canyons or other steep slopes designated as VHFHSZ areas. As such, reasonably foreseeable activities associated with the Proposed Program would have the potential to exacerbate wildfire risk, thereby exposing students or faculty to pollutant concentrations in the event of a wildfire. This impact would be potentially significant, and further analysis is warranted in the PEIR.

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 wildfire risk or that may result in temporary or ongoing impacts to the environment?

Potentially Significant Impact. As discussed under question XIX.a, activities at existing schools that would increase enrollment and the acquisition and development of new schools would represent a new or additional source of utility demand (i.e., electricity, natural gas, and telecommunications) that could require relocation or installation of new utility connections. Furthermore, new schools could be constructed on undeveloped land without utility facilities, or on developed sites that would require relocation or modifications to existing utilities. The installation of these utilities on existing or new school or administration sites that are within or adjacent to VHFHSZ areas could exacerbate wildfire risk. Similarly, the acquisition of new school sites within or adjacent to VHFHSZ areas could require the removal of vegetation to maintain defensible spaces. Therefore, impacts would be potentially significant, and further analysis is warranted in the PEIR.

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?

Potentially Significant Impact. According to the U.S. Geological Survey, fast moving and highly destructive debris flows triggered by intense rainfall are considered one of the most dangerous post-wildfire hazards. The risk of flooding and debris flows increases substantially after a wildfire due to the loss of vegetation, which leaves previously covered soil exposed during a rainstorm. The program area contains areas mapped as landslide hazard zones in the City of San Diego's Seismic Safety Study (City of San Diego 2008). As a result, these areas are already prone to landslides, which could be exacerbated following a wildfire. Existing school and administration sites are located downslope of these areas and new school sites could also be developed in these areas. Therefore, reasonably foreseeable activities associated with the Proposed Program could 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. Impacts would be potentially significant, and further analysis is warranted in the PEIR.

XX	I. Mandatory Findings of Significance	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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 that will cause substantial adverse effects on human beings, either directly or indirectly?				

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?

Potentially Significant Impact. As discussed under Section IV, *Biological Resources*, construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program would result in potentially significant impacts on biological resources. These activities would have the potential to substantially degrade the quality of the environment, substantially reduce species' habitats, cause a species' population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, and substantially reduce the number of rare or endangered species. In addition, as discussed under Section V, *Cultural Resources*, impacts on cultural and historical resources within the program area would be potentially significant. The loss and/or destruction of cultural and historical resources would affect important examples of the major periods of California history or prehistory. Therefore, impacts are potentially significant, and further analysis is warranted in the PEIR.

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.)

Potentially Significant Impact. State CEQA Guidelines Section 15130 requires a discussion of the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable," meaning that the project's incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects. The cumulative impacts discussion does not need to provide as much detail as is provided in the analysis of project-specific impacts and should be guided by the standards of practicality and reasonableness.

As determined by this Initial Study, there may be potentially significant effects related to aesthetics, air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise and vibration, recreation, transportation and traffic, tribal cultural resources, and utilities and service systems. Therefore, further analysis of the Proposed Program's potential contribution to cumulative impacts related to these resources is warranted in the PEIR.

Because the Proposed Program would have no impact on agriculture and forestry resources, mineral resources, population and housing, or public services it was determined that the Proposed Program would have no potential to result in cumulative impacts related to these resource areas. Further analysis of the cumulative effect on these resources is not warranted in the PEIR.

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

Potentially Significant Impact. A discussion of direct and indirect effects on human beings will be provided in the forthcoming PEIR. As demonstrated in the analysis in this Initial Study, construction and operational activities that would be reasonably foreseeable with implementation of the Proposed Program would potentially result in substantial adverse effects on the environment, including human beings, either directly or indirectly. Specific environmental impacts that could have a substantial adverse effect on human beings include potential construction-related health risks and construction- and operation-related noise and vibration levels. Furthermore, cumulative impacts associated with the Proposed Program would be potentially significant. Therefore, the effects on human beings as a result of the Proposed Program would be potentially significant, and further analysis is warranted in the PEIR.

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References

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San Diego Unified School District

Paul Garcia Facilities Development CEQA Coordinator

Tom Calhoun Lead Project Manager, Facilities Planning and Construction

ICF

Kathie Washington Project Director

Elyssa Figari Project Manager

Tristan Evert Deputy Project Manager

Claudia Watts Environmental Planner

Matt McFalls Air Quality and Greenhouse Gas Emissions

Karen Crawford Technical Director, Cultural Resources

Karolina Chmiel Cultural Resources (Pre Historic)

Tim Yates, Ph.D. Cultural Resources (Historic)

Jonathan Higginson Noise and Vibration

David Duncan Graphics/GIS

Ken Cherry Editor

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