

Appendices

Appendix 1-1 Initial Study/Mitigated Negative Declaration

Appendices

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February 2020 | Initial Study

DEL MAR HEIGHTS SCHOOL REBUILD PROJECT

Del Mar Union School District

Prepared for:

Del Mar Union School District

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	average daily traffic
amsl	above mean sea level
AQMP	air quality management plan
AST	aboveground storage tank
BAU	business as usual
bgs	below ground surface
BMP	best management practices
CAA	Clean Air Act
CAFE	corporate average fuel economy
CalARP	California Accidental Release Prevention Program
CalEMA	California Emergency Management Agency
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
cfs	cubic feet per second
CGS	California Geologic Survey
CMP	congestion management program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level

Abbreviations and Acronyms

CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
Corps	US Army Corps of Engineers
CSO	combined sewer overflows
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dba	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gases
GWP	global warming potential
HCM	Highway Capacity Manual
HQTA	high quality transit area
HVAC	heating, ventilating, and air conditioning system
IPCC	Intergovernmental Panel on Climate Change
L _{dn}	day-night noise level
L _{eq}	equivalent continuous noise level
LBP	lead-based paint
LCFS	low-carbon fuel standard
LOS	level of service
LST	localized significance thresholds
M _w	moment magnitude
MCL	maximum contaminant level
MEP	maximum extent practicable
mgd	million gallons per day
MMT	million metric tons

Abbreviations and Acronyms

MPO	metropolitan planning organization
MT	metric ton
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O ₃	ozone
OES	California Office of Emergency Services
PM	particulate matter
POTW	publicly owned treatment works
ppm	parts per million
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMP	risk management plan
RMS	root mean square
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SIP	state implementation plan
SLM	sound level meter
SoCAB	South Coast Air Basin
SO _x	sulfur oxides
SQMP	stormwater quality management plan
SRA	source receptor area [or state responsibility area]
SUSMP	standard urban stormwater mitigation plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TNM	transportation noise model

Abbreviations and Acronyms

tpd	tons per day
TRI	toxic release inventory
TTCP	traditional tribal cultural places
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WSA	water supply assessment

1. Introduction

Del Mar Union School District (District) proposes to redesign and reconstruct Del Mar Heights School, an elementary school located at 13555 Boquita Drive in the Del Mar Heights subdivision of the Torrey Pines community, in the City of San Diego, San Diego County. The rebuild project would address the most critical physical needs of the buildings and grounds at the campus through the rebuilding and reconfiguration of the campus. The proposed project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA).

As the lead agency with the principal responsibility for carrying out and approving the project, the District is required to consider the project's potential environmental consequences and determine if its benefits outweigh any significant effects. This document is an "initial study" of the effects.

1.1 PROJECT LOCATION

The approximately 10.85-acre project site encompasses the Del Mar Heights School property at 13555 Boquita Drive in the City of San Diego. The project site consists of Assessor's Parcel Number (APN) 301-0500-700, and is in Del Mar Heights, a 760-lot subdivision located in the Torrey Pines community. The project site is surrounded by Boquita Drive to the north, Mira Montana Drive to the east, and open space canyonlands to the south and west of the project site. The subdivision of Del Mar Heights, in the City of San Diego, is surrounded by the City of Del Mar to the west, and the City of San Diego to the north, east, and south, and is approximately 0.30-mile west of Interstate 5 (I-5). The project site is southeast of Canyon Crest Open Space Park, east and north of Torrey Pines State Natural Reserve, and the City of San Diego's Multi-Habitat Planning Area (MHPA) is located to the west and south of the site. Figure 1, *Regional Location*, and Figure 2, *Aerial Photograph*, show the project site from its regional and local contexts.

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing Land Use

Facilities and Drainage

The project site currently operates as a K-6 school and includes an administration building, 22 classrooms, and 13 specialty classrooms (permanent and portables); the total square footage of the buildings onsite is 52,406 square feet. These structures are located in the northern and eastern portions of the site. The northwest portion of the site include play structures, a surface parking lot with 48 spaces is located at the northeast portion of the site, and hardcourts and play structures are located in the central portion of the site, north of the playing field. The eastern portion of the site includes a vegetable garden and play structures. A multi-use field is situated in the southern portion of the site. Figure 3, *Local Vicinity*, shows the existing site facilities from an aerial view. Figures 4a-4c, *Site Photographs*, show photos of the project site. According to the Facilities Master Plan (see

1. Introduction

Appendix A), the portable classrooms, plumbing, roofing, and HVAC systems need replacement, and the site requires regrading. The classrooms include underutilized internal access and the Multi-Use Room (MUR) is disassociated from the campus. Modernization of the school facilities, including the play structures/fields, and redesign and reconstruction of the campus facilities are required to improving student safety and flow within the campus.

Two existing stormwater outfall drainages have failed; the existing stormwater outfall pipes at these locations show significant signs of deterioration and as a result, are causing erosion along the southern and western limits of the school. Stormwater is directed to these outfall locations by surface flow and underground pipes. Due to the failed drainages, deep erosional gullies have formed. The erosion is also contributing to loss of vegetation within the eroded areas.

Access and Parking

The ingress and egress to the campus is through the school's driveway on Boquita Drive, which leads to the school's parking lot. Vehicular access is via a two-way driveway. The parking lot contains 48 stalls and an approximately 317-foot passenger loading area, which can accommodate approximately 15 cars, adjacent to the administration building. The District's 2018 Facilities Master Plan recognizes the hazard presented along Boquita Drive and the adjoining neighborhood due to the limited drop-off/pick-up zones, and insufficient onsite parking.

The school's principal (Jason Soileau, 2020) has observed the following hazardous conditions:

- Due to insufficient on-site parking, staff and parents are forced to park along Boquita Drive, which further narrows a two-lane neighborhood street.
- The long traffic queue backs up to the 4-way stop Boquita Drive/Cordero Road intersection and despite placement of a crossing guard, pedestrian crossing is difficult.
- The afternoon queue of cars waiting for student pick-up causes other drivers to drive on the wrong side of the road to access the parking lot.
- Emergency vehicle access is also constricted by the afternoon queue due to parked cars.
- Mostly during afternoon pick-up, some parents park on Cordero Road and then walk on the east side of Boquita Drive, instead of using the crosswalk on Cordero Road; parents cross Boquita Drive into the school, which results in stopping traffic in both directions.
- Riding bikes to school is challenging due to the cars parked on both sides of the road, queuing in both lanes and the narrow sidewalks do not provide enough space for safe riding.
- Parked cars of both sides of the street limit the ability of mail and trash trucks to access residences, which further congests the street.
- During the afternoon pick-up, some parents abandon their cars in the travel lane to retrieve their child.

Figure 1 - Regional Location
1. Introduction



Note: Unincorporated county areas are shown in white.
Source: ESRI, 2019

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Scale (Miles)

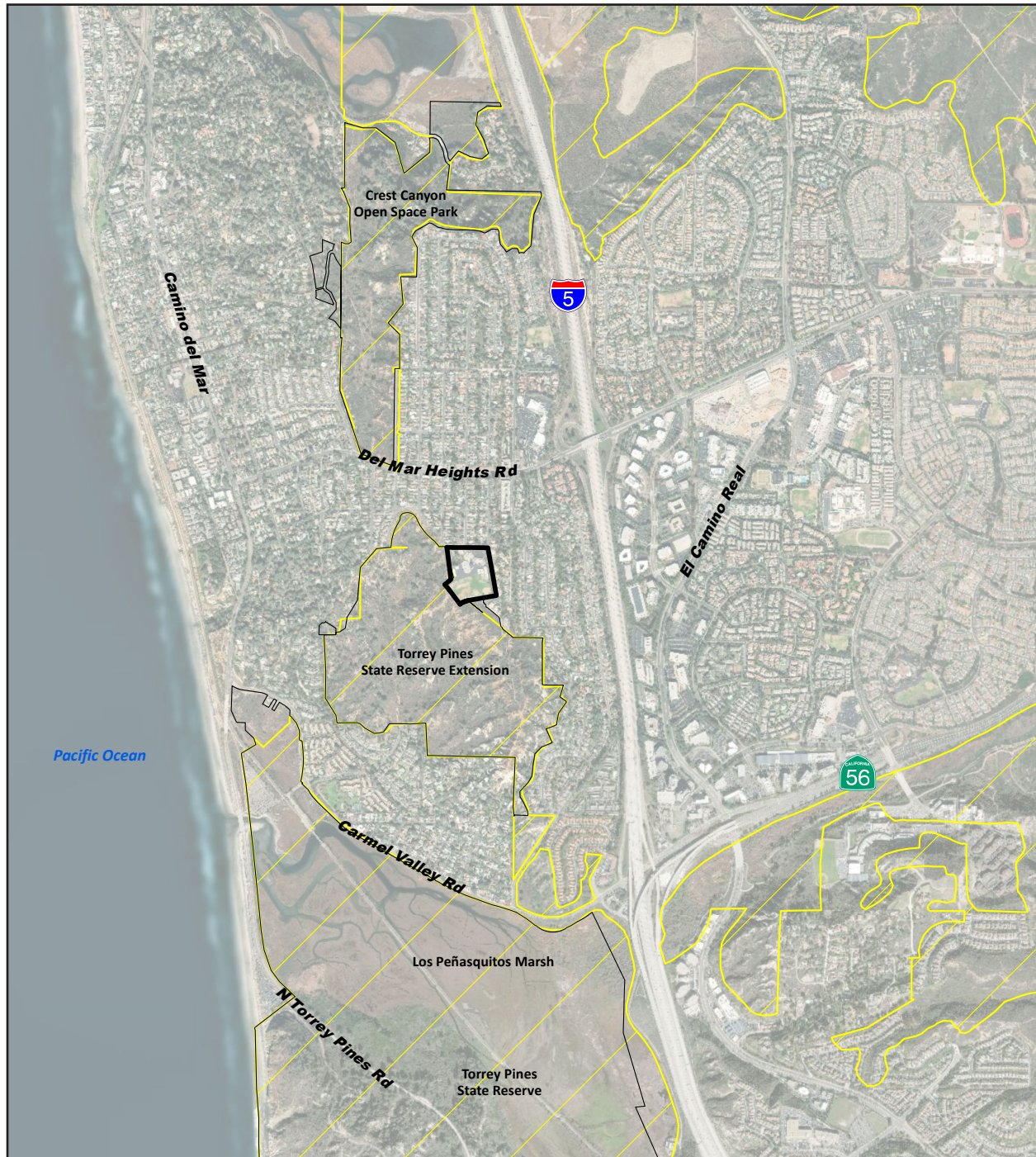




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1. Introduction

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Figure 2 - Aerial Photograph
1. Introduction



-  Project Boundary
-  City of San Diego Multi-Habitat Planning Area (MHPA)

0 2,500
Scale (Feet)



1. Introduction

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Figure 3 - Local Vicinity
1. Introduction



--- Project Boundary

0 350
Scale (Feet)



Source: Google Earth Pro, 2019

1. Introduction

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Figure 4a - Site Photographs
1. Introduction



View from Durango Drive.



1. Introduction

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Figure 4b - Site Photographs
1. Introduction



1. Introduction

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Figure 4c - Site Photographs
1. Introduction



View from Mira Montana Drive.

1. Introduction

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1. Introduction

- Some parents complete an illegal and hazardous U-turn on Boquita Drive to avoid the time required to flow through the on-site loop.
- The congestion on Boquita Drive causes a large number of parents to direct their children to walk to the canyon via Mira Montana Drive, which creates safety concerns.
- Some parents arrive early in the afternoons and parking on Boquita Drive, which results in blocking driveways.

Operations

Del Mar Heights School is one of eight schools operated by the District. Del Mar Heights School offers kindergarten and grades 1 through 6.

Del Mar Heights School follows the District's attendance calendar. All grades at the school start at 8 AM and are dismissed at 2:30 PM on Mondays, Tuesdays, Thursdays, and Fridays; on Wednesdays, which follows a minimum day schedule, students are dismissed at 12:30 PM.

The 2019-2020 school year enrolled 459 students. During the 2018-2019 school year, Del Mar Heights School enrolled 495 students in kindergarten through sixth grade. Del Mar Heights School's highest enrollment of 504 students occurred during the 2017-2018 school year, and over the last 10 school years, the school had an average enrollment of 460 students. Table 1, *Del Mar Heights School 10-Year Enrollment History*, shows the 10-year enrollment history for Del Mar Heights School.

Table 1 Del Mar Heights School 10-Year Enrollment History

School Year	Enrollment
2018-2019	495
2017-2018	504
2016-2017	479
2015-2016	459
2014-2015	443
2013-2014	458
2012-2013	444
2011-2012	442
2010-2011	431
2009-2010	445
10-Year Average Enrollment:	460

Source: CDE 2019.

The District owns the site and allows community use of the multi-use field for activities such as baseball and soccer.

1. Introduction

1.2.2 Surrounding Land Use

The project site is in a residential community with low-density, single-family residences, and is approximately 0.80 mile east of the Pacific Ocean. The site is surrounded by the land uses described below.

- **North:** Boquita Drive and single-family residences.
- **East:** Mira Montana Drive and single-family residences.
- **South:** Mira Montana Drive, single-family residences, and open space canyonlands in the Torrey Pines State Natural Reserve, which is dedicated to preserving Torrey Pines and indigenous wildlife.
- **West:** Open space canyonlands in the Torrey Pines State Natural Reserve.

1.3 EXISTING ZONING AND GENERAL PLAN

The City of San Diego General Plan Land Use Designation for the project site is Institutional and Public and Semi-Public Facilities (San Diego 2018). The project site is zoned RS-1-3 (San Diego 2019). Under the RS-1-3 zone, a Conditional Use Permit is required for educational facilities, according to San Diego Municipal Code Section 131.0422, *Use Regulations Table for Residential Zones*. As the site currently operates as an educational facility, the District does not need to apply for a Conditional Use Permit again and the District may exempt the site from local zoning under its authority under Government Code 53094.

To the east and southeast of the project site, properties are zoned RS-1-3, to the north of the project site, properties are zoned RS-1-6, and the Torrey Pines State Natural Reserve, to the south and west of the project site, is zoned OP-1-1 (San Diego 2019). The General Plan Land Use Designation of the surrounding area is Residential, with the exception of the Torrey Pines State Natural Reserve, which is designated Park, Open Space, and Recreation.

1.4 DISTRICT ACTION REQUESTED

The Initial Study/Mitigated Negative Declaration examines the potential environmental impacts of the proposed Del Mar Heights School Rebuild project. This Initial Study/Mitigated Negative Declaration is also being prepared to address various actions by the District to adopt and implement the proposed project. It is the intent of this Initial Study/Mitigated Negative Declaration to enable the District to make an informed decision with respect to the proposed project. The District would be required to approve the Initial Study/Mitigated Negative Declaration and approve the proposed project.

1.5 PROJECT DESCRIPTION

1.5.1 Proposed Land Use

Del Mar Union School District plans to fully redesign and reconstruct the Del Mar Heights School. The capacity will be reduced by one classroom (approximately 24 students), buildings will be limited to one story with low

1. Introduction

slope roofs, and access to the school will remain via Boquita Drive. The District plans to seek matching state funds, which will trigger the need for California Department of Education (CDE) and Department of Toxic Substances Control (DTSC) approvals in addition to the CEQA process. The District seeks to submit plans to California Division of the State Architect (DSA) approximately March 2020, with construction to start approximately June 2020 and end approximately July 2021. School opening would be planned for September 2021. Figure 5, *Site Plan*, shows the proposed improvements. Construction of the proposed project would occur over an approximately 8.4-acre area.

Facilities and Drainage Improvements

Under the proposed project, the number of classrooms would be reduced by one, from 22 classrooms to 21 classrooms; the number of specialty classrooms, 13, would remain unchanged. The square footage of buildings onsite would increase from 52,406 square feet to 66,823 square feet due to the increase in internal circulation and collaboration spaces between classrooms.

All buildings, play spaces, and fields would be located in the central portion of the site, to the south of the proposed parking area and west of the drop-off zone and staff parking area. The administration building, kindergarten classrooms and playground, and after school classrooms would be located at the northern portion; classrooms and learning spaces for grades 1 through 3 would be located at the eastern portion; and classrooms and learning spaces for grades 4 through 6 would be located at the southern portion of the site. Additionally, the art, science, and music studios, multi-use room (M.U.R.), and Innovation Center (I.C.) which was formerly the library would be located to the west of the administration building. The landscape buffer along the eastern portion of the site would be preserved and improved to shield views of the school roof and buffer sound. The school facilities have been designed and located such that noise from their use would not be louder than the existing conditions ambient noise levels within the adjacent MHPA/preserve area.

Furthermore, the proposed project would require improvements to outfall drainage at the southern and western portions of the property boundary, as the existing stormwater outfalls are causing erosion. The improvements to the southern and western slopes would disturb approximately 610 square feet and 2,000 square feet, respectively. For both outfall drainage improvements, slopes at these existing outfalls would be improved and planted with native vegetation, including but not limited to a native hydroseed mix, *Baccharis pilularis* ‘Pigeon Point’, *Arctostaphylos*, *Encelia farinosa*, *Malosma laurina*, *Penstemon centranthifolius*, *Rhus integrifolia*, *Rhus ovata*, *Salvia leucophylla*, and *Zauschneria californica*, to improve slope stability. The slopes at the outfall locations would be backfilled and restored to their original grade.

Additionally, these outfalls would also be improved with concrete energy dissipators and rip rap to avoid future erosion by reducing flow velocities of stormwater, per the City’s requirements, and jute-netting or straw blankets would be used on the reconstructed slopes to add stability. Surface runoff from the project site, that has been treated by bioswales in compliance with State permit regulations, will flow into these outfall drainages to avoid untreated stormwater from draining into the MHPA; the stormwater system design would not result in a net increase of flows. The outfalls would include new piping which would replace the existing stormwater pipes which have deteriorated and are contributing to the existing erosion. The proposed improvements would be irrigated by above-grade brown UV resistant PVC pipe and rotors that would provide the water needed for

1. Introduction

these native plant species to properly establish; the temporary irrigation would be disconnected from the school's irrigation when the native plant species have been established.

Access and Circulation

To reduce circulation and congestion issues, as well as the number of cars parked within the neighborhood, the District is proposing to increase onsite parking and lengthen the passenger loading and vehicle queuing zone, to ensure impacts to the neighborhood north of the project site are reduced.

The parking lot onsite would be expanded to include a total of 80 staff, visitor, and kindergarten parking spaces which would result in a net increase of 32 stalls, compared to existing conditions. The proposed eastern parking lot would be within a range of 10 feet to 25 feet below the elevation of Mira Montana Drive, which would limit noise and views of the parking lot from Mira Montana Drive residences.

At the center of the eastern parking lot, at the southeastern portion of the site, a drop-off/pick-up zone and turnaround would be created, to allow vehicles to exit from the existing driveway on Boquita Drive. Moreover, the passenger loading, and vehicle queuing zone would be extended from the entrance of the driveway to the southeastern portion of the site. The extended queuing zone would accommodate approximately 41 cars, which is a net increase of approximately 26 cars from existing conditions and would be adjacent to the kindergarten and first through third grade classrooms. Special-education van queuing would be located to the south of the drop-off/pick-up zone, before the turnaround. By increasing efficiency and flow for vehicles to enter and exit the school property, congestion on adjacent streets would be reduced, thereby creating a safer environment for students who live in the neighborhood to walk and/or bike to campus, consistent with District Board Policy 5142.2, Safe Routes to School.

The plan includes construction of an ADA-compliant ramp and stairs from the Mira Montana Drive cul-de-sac down to the southeastern end of the campus. This will improve safety as students are now following a dirt path at this location.

Fields, Park, and Recreational Amenities

The proposed project would provide amenities that are not now available, including an open grass amphitheater area for larger group gatherings, a Canyon Rim path and sidewalk which would create a walking loop around the site, and stair and ramp access to the trail head at the southern portion of the site which serves as a workout opportunity.

The existing kindergarten area, at the northwest corner of the site, would be converted to an outdoor learning area which would provide green space and would be a viewpoint. The outdoor learning area would be designed for educational programs for the students. The outdoor learning area would not include lighting. Along the western boundary of the school, a canyon rim field access area and canyon rim nature path would provide views of the open space areas to the west of the project site.

The commons, playground, and play equipment would be in the central portion of the campus and north of the multi-use field. A garden would be located at the southeastern corner of the multi-use field.

1. Introduction

The multi-use field would be reconfigured and would remain in the western portion of the site. Following the educational specifications adopted for the school, the site plan increases the area provided for learning spaces, and consequently reduces the amount of space remaining for outdoor recreation. While the two ballfields used by the older little league teams (90-foot infields) and the batting cages would be eliminated, the new flat grass field has space for two smaller fields used by younger baseball teams. The field is also available for soccer play.

Lighting

No lighting is proposed for the field, which is adjacent to the MHPA. The school walkways and parking areas would have motion-detected lighting for security and safety purposes. Exterior lights would be placed on building walls and on 20-foot poles within parking and passenger loading and vehicle queuing areas. Evening events would end by 9 PM. The longest period of lighting would be from approximately 5 PM to 9 PM during winter months.

1.5.2 Project Phasing

In order to accommodate the existing students that attend Del Mar Heights School during construction of the school, which is estimated to be approximately 14 months, students would be temporarily relocated to the following schools within the District, as follows:

- K through 2nd Grade
 - Del Mar Hills Academy, 14085 Mango Drive, Del Mar, CA 92014
- 3rd through 6th Grades
 - Ocean Air School, 11444 Canter Heights Drive, San Diego, CA 92130

Figure 6, *Interim School Locations*, shows the locations of the schools that would accommodate the Del Mar Heights School students during construction. The proposed plan is to relocate 236 K-3 students to Del Mar Hills Academy and to relocate 203 students in grades 4-6 to Ocean Air School. Because of the proximity of Del Mar Hills Academy to Del Mar Heights School, the transportation mode for the K-3 students would be essentially unchanged; i.e., the students would either walk or be driven to the school. However, since Ocean Air School is not in the same neighborhood as Del Mar Heights School and Del Mar Hills Academy, the District would provide buses so that the students in grades 4-6 would have the opportunity to ride a bus to Ocean Air School.

The plan is for the buses to stage for loading and unloading at Del Mar Hills Academy for the trip to Ocean Air School. To minimize traffic congestion, the buses would leave Del Mar Hills Academy 20 to 30 minutes prior to the beginning of the school day and would arrive back at Del Mar Hills Academy 20 to 30 minutes after the end of the school day. Parents would also have the option of driving the students to Ocean Air School, which would be more convenient for many of the students and parents.

Table 2, *Capacities of Schools to Accommodate Students During Relocation*, shows the existing number of classrooms per grade at Del Mar Heights School, Del Mar Hills Academy, and Ocean Air School, as well as the required teaching stations (including permanent and portable classrooms) needed to accommodate students from Del Mar Heights School at the respective schools.

1. Introduction

Table 2 Capacities of Schools to Accommodate Students During Relocation

Del Mar Heights		Del Mar Hills		Ocean Air	
Grade	Classrooms	Grade	Classrooms	Grade	Classrooms
K	3	K	2	K	3
1	3	1	2	1	3
2	3	2	2	2	3
3	3	3	2	3	3
4	3	4	2	4	3
5	2.5	5	2	5	3.5
6	2.5	6	2	6	3.5
SDC ¹	2	SDC	0	SDC	1
Total	22	Total	14	Total	25
Projected Del Mar Heights Classroom Needs			13		10 ²
Projected Available Teaching Stations			9		9
Available Teaching Stations Needed			4		1

Source: DMUSD 2019

Notes:

¹ SDC – Special Day Class

² Additional teaching station factored in for potential office/meeting space.

As shown in Table 2, a total of 13 classrooms, for grades K through 2, and a total of nine classrooms, for grades 3 through 5, would be needed to accommodate relocated students from Del Mar Heights School to Del Mar Hills Academy and Ocean Air School, respectively. Del Mar Hills Academy and Ocean Air School have nine teaching stations available at each school. Therefore, in order to accommodate the students from Del Mar Heights School, at both schools, four portable classrooms would be added to Del Mar Hills Academy and one portable classroom would be added to Ocean Air School for a potential office/meeting space. Even if all five portable classrooms were added to one campus, this addition would be categorically exempt under CEQA Guidelines § 15314, Class 14 – Minor Additions to Schools.

Construction

Construction activities would include building and asphalt demolition and excavation, site preparation and rough grading, utility trenching, fine grading, building construction, architectural coating, asphalt paving, finishing, and landscaping. Figure 7, *Grading Plan*, shows the areas of the site that would be graded, the locations of the outfalls, and to what extent. All proposed improvements and areas of disturbances would occur within the current fence line of the project site. Construction is proposed to take place during the municipal code's allowable hours of 7:00 AM to 7:00 PM, Monday through Saturday.

A construction worksite traffic control plan would be prepared and implemented by the District. The plan would identify haul routes, hours of construction, protective devices, warning signs, and access. The active construction and staging areas would be located on the project site.

Figure 5 - Site Plan
1. Introduction



--- Project Boundary

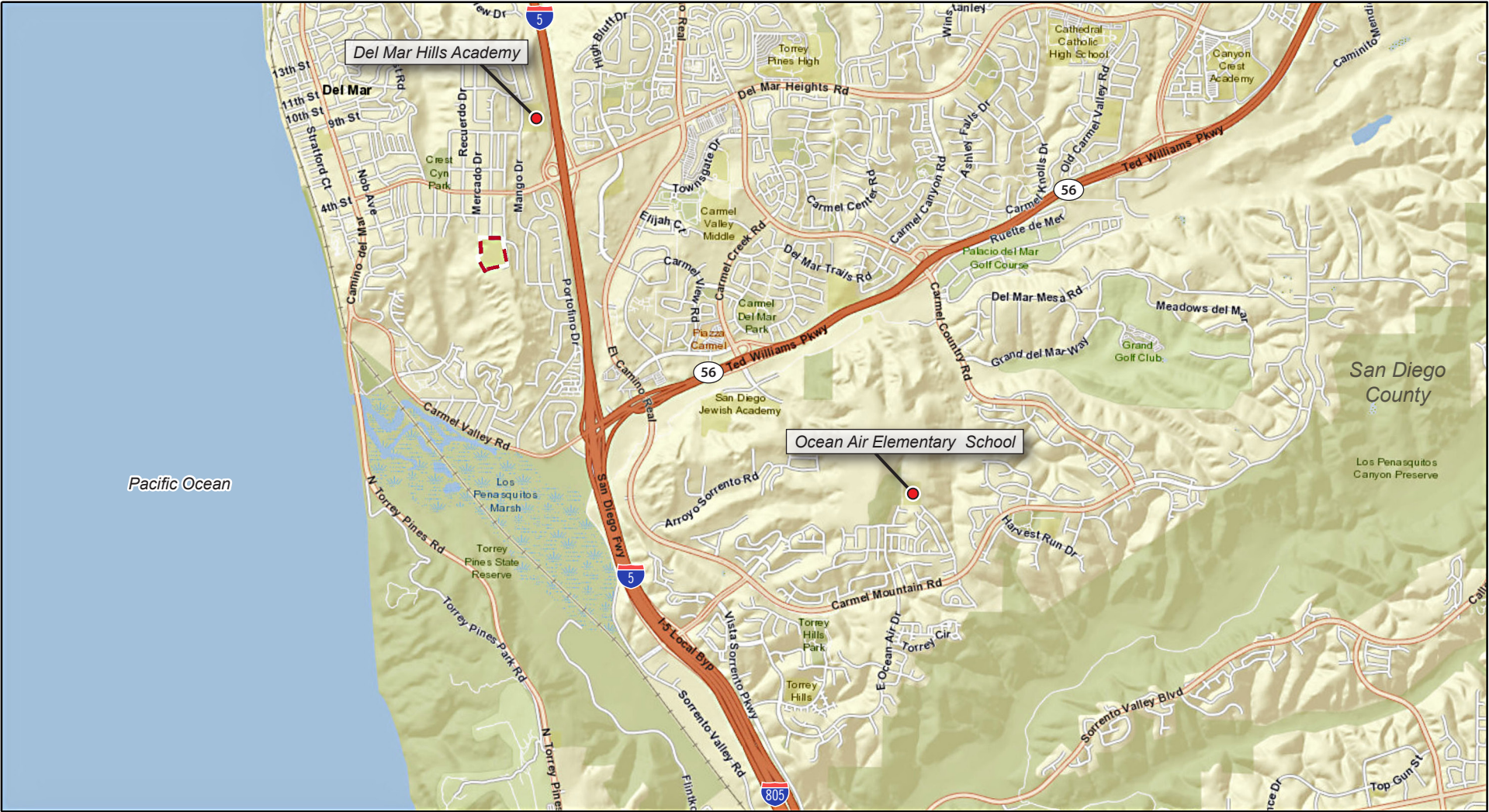
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Scale (Feet)



1. Introduction

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Figure 6 - Interim School Locations
1. Introduction



--- Project Boundary

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Scale (Miles)

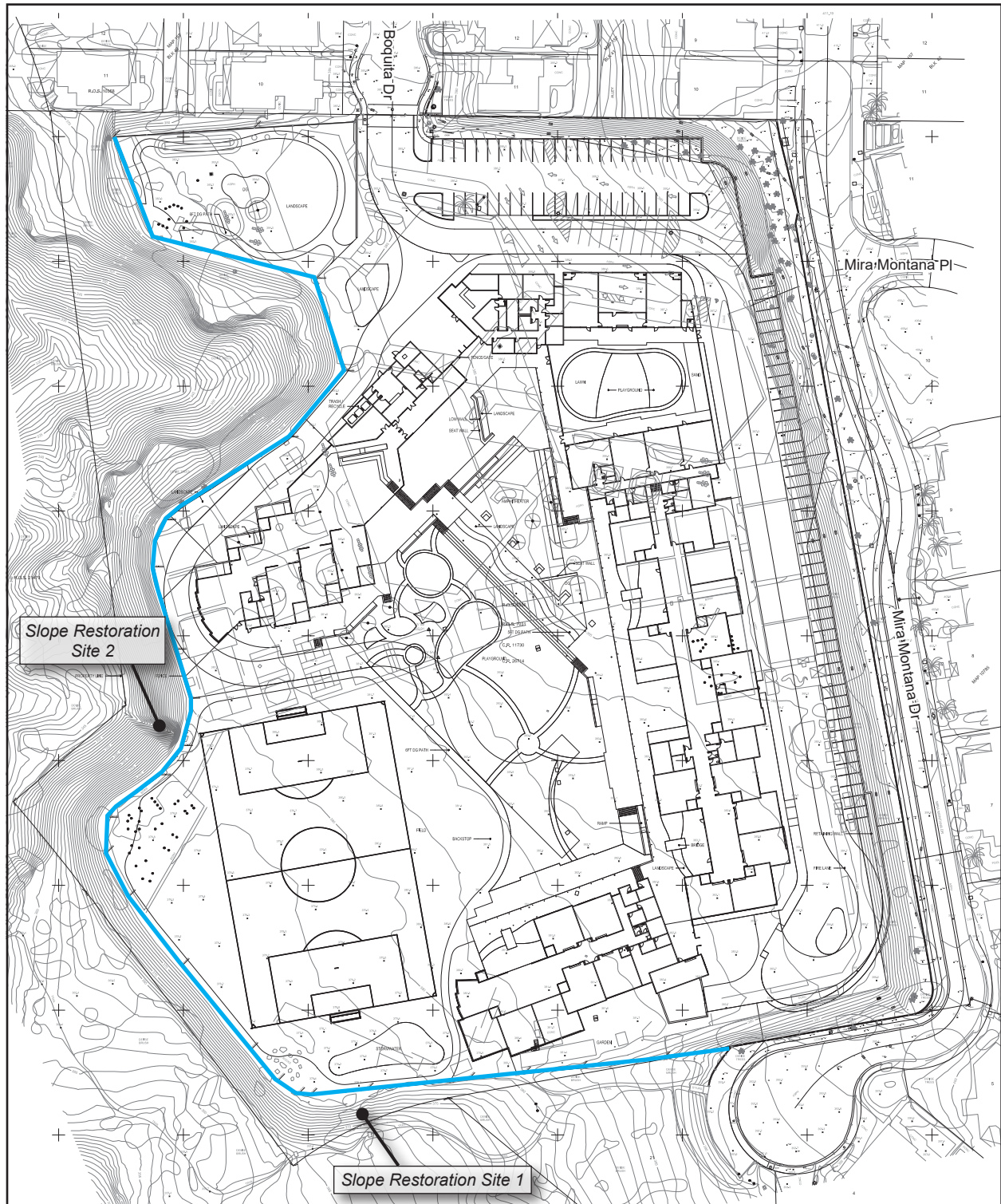


Source: ESRI, 2019

1. Introduction

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Figure 7 - Grading Plan
1. Introduction



— Fence (Limits to Area of Disturbance)

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Scale (Feet)



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2. Environmental Checklist

2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** Del Mar Heights School Rebuild Project

2. **Lead Agency Name and Address:**
Del Mar Union School District
11232 El Camino Real
San Diego, CA 92130

3. **Contact Person and Phone Number:**
Chris Delehanty, Executive Director
Capital Programs and Technology
858.523.6040

4. **Project Location:**
The project site is on the Del Mar Heights School campus at 13555 Boquita Drive in the subdivision of Del Mar Heights, in the City of San Diego, California (APN 301-0500-700).

5. **Project Sponsor's Name and Address:**
Del Mar Union School District
11232 El Camino Real
San Diego, CA 92130

6. **General Plan Designation:** Institutional and Public and Semi-Public Facilities

7. **Zoning:** RS-1-3

8. **Description of Project:**
Del Mar Union School District plans to fully rebuild the Del Mar Heights School. The capacity will be reduced by one classroom (approximately 24 students), buildings will be limited to one story with low slope roofs, and access to the school will remain via Boquita Drive. Del Mar Union School District plans to fully redesign and reconstruct the Del Mar Heights School. The capacity will be reduced by one classroom (approximately 24 students), buildings will be limited to one story with low slope roofs, and access to the school will remain via Boquita Drive. The proposed project will also consist of improving and increasing parking and circulation onsite.

9. **Surrounding Land Uses and Setting:**
The project site is surrounded by single-family residences to the north, east, and south, and open space canyonlands to the south and west.

2. Environmental Checklist

10. Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement):

City of San Diego

- California Department of Education, School Facilities Planning Division (CDE)
- California Department of General Services, Division of State Architect (DSA)
- San Diego Regional Water Quality Control Board

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, lead agencies, and project proponents 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. (See 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 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The District has not received notification from California Native American tribes per Public Resources Code section 21080.3.1.

2. Environmental Checklist

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture / Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

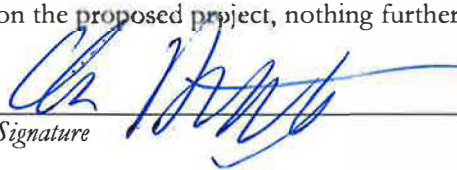
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ 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 in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. 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 EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


Signature

February 19, 2020

Date

2. Environmental Checklist

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

2. Environmental Checklist

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

2. Environmental Checklist

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3. Environmental Analysis

Section 2.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if applicable.

3.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized 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?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

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

Less Than Significant Impact. Vistas provide visual access or panoramic views to a large geographic area. The City of San Diego Urban Design Element provides policies that call for the preservation and protection of views, such as UD-A.3.1, “Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas” (San Diego 2008a). The project site is adjacent to open space canyonlands, to the west of the site, and the Pacific Ocean is 0.80 mile west of the site. The proposed developments onsite would be limited to one story with low slope roofs. The elevation of Mira Montana Drive is approximately 399 feet, and the highest elevation of where the proposed buildings would be located, on the eastern portion of the site, is approximately 387 feet – a difference of 12 feet. As shown in the visual simulations (Figure 8a, *Visual Simulation Points*, Figure 8b, *Daytime and Nighttime Visual Simulation from Durango Drive*, Figure 8c, *Visual Simulation from Mira Montana Drive*, Figure 8d, *Visual Simulation from Entry at Boquita Drive*, and Figure 8e, *Visual Simulation from Mira Montana Trail Head*), views from Durango Drive, Mira Montana Drive, Boquita Drive, and the Mira Montana trail head would be similar to existing conditions, in part, due to the existing landscaping, varying topography and elevations, and the proposed one-story buildings with low sloped roofs. As seen in the entry from the

3. Environmental Analysis

Boquita Drive visual simulation, the existing building to the east would be removed, thereby increasing views of the open space canyonlands and Pacific Ocean. The view from Mira Montana Drive would not be obstructed upon project implementation due to the higher elevation at Mira Montana Drive and the one-story low-sloped roof of the proposed building. Similarly, as the proposed project would occur mostly within the existing disturbed footprint of the site's fence line, views from Durango Drive of the open space canyonlands and from the Mira Montana trail head of the Pacific Ocean and open space areas would be similar to existing conditions. Therefore, the proposed buildings and reconfiguration of the project site would not have a substantial effect on scenic vistas; impacts would be less than significant.

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

No Impact. The closest designated state scenic highway is State Route 75 (SR-75), over 18 miles southeast of the project site. Due to the distance and intervening structures, project development would not result in impacts to scenic resources within a designated state scenic highway. Therefore, no impact would occur.

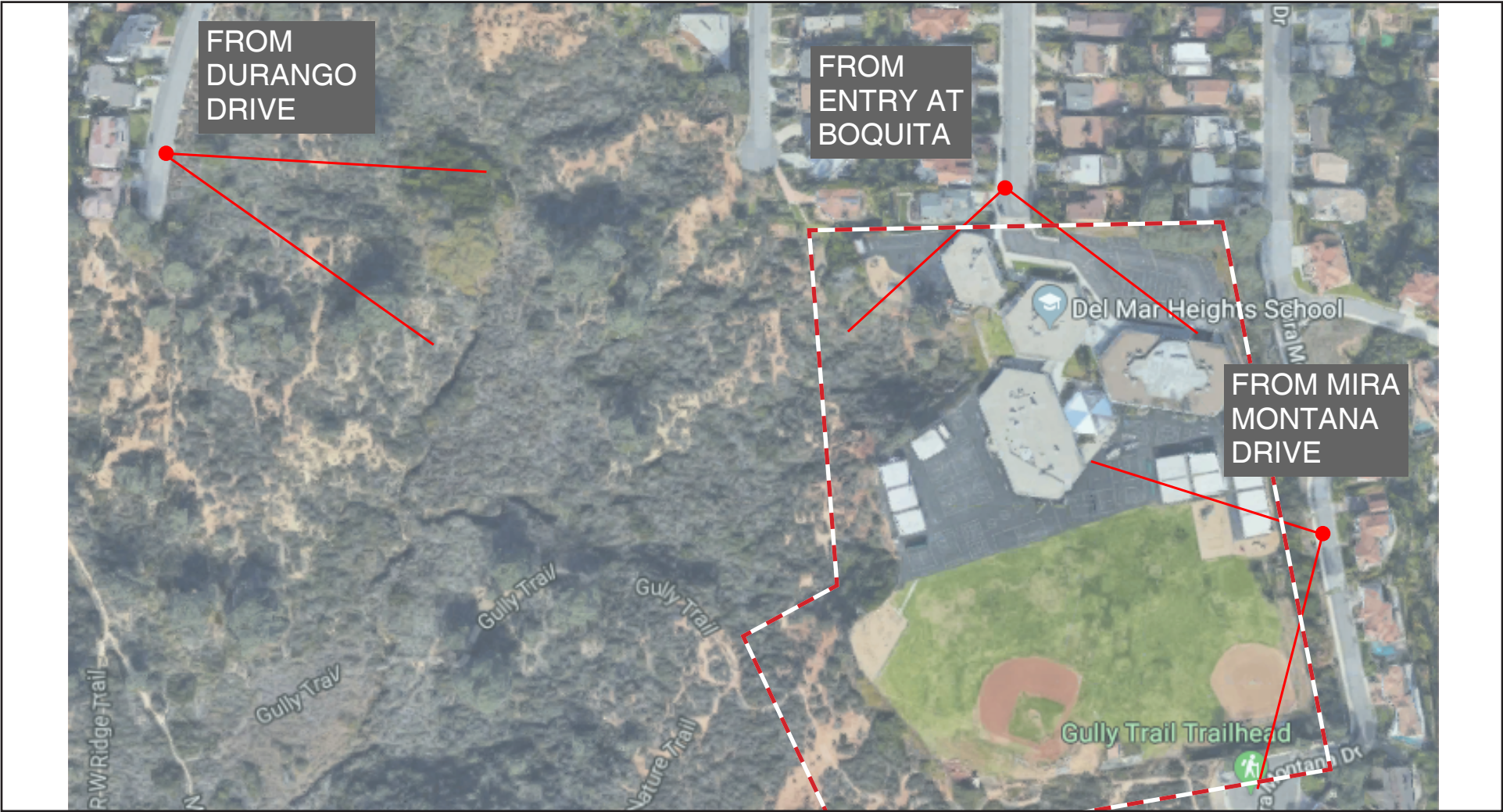
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable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

Less Than Significant Impact. The project site is located in an urbanized portion of the City and is currently developed with an existing school. Surrounding uses include residential uses to the north, east, and south, and open space canyonlands to the west and south. The proposed project would not substantially change the existing character of the site. The proposed project would be compatible with the existing development pattern onsite and the character of the surrounding area. Building materials and colors would complement the existing development on adjacent properties. The proposed buildings would have a standing seam metal roof, composite wood planks, and smooth and textured fiber cement paneling, to reinforce the coastal appearance of the surroundings. Although the visual qualities of the project site during construction would not appear better than the existing condition of the property, the construction worksite would be temporary. The finished project would include landscaping, new buildings with siding, paint, and windows, and the exterior finishes of the proposed buildings would complement and blend in with the design of the surrounding structures and coastal neighborhood. Moreover, the locations of the buildings would result in a campus similar to the existing school and would not significantly change the aesthetic of the site (see Figures 8a-8e). Therefore, although project implementation would alter the visual appearance of the site, the improvements would not substantially degrade the visual character and quality of the project site and surrounding area. Therefore, impacts would be less than significant.

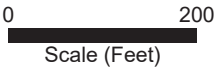
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the intended area to be lit. Glare occurs when a bright object is against a dark background, such as oncoming vehicle headlights or an unshielded light bulb. The

Figure 8a - Visual Simulation Points
3. Environmental Analysis



--- Project Boundary



Source: Baker Nowicki Design Studio, 2019

3. Environmental Analysis

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Figure 8b - Daytime and Nighttime Visual Simulation from Durango Drive
3. Environmental Analysis



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Figure 8c - Visual Simulation from Mira Montana Drive
3. Environmental Analysis



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Figure 8d - Visual Simulation from Entry at Boquita Drive
3. Environmental Analysis



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Figure 8e - Visual Simulation from Mira Montana Trail Head
3. Environmental Analysis



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3. Environmental Analysis

project site currently generates light from its buildings (interior and exterior) and parking lot. As shown in Figure 8b, the exterior wall sconces on the building (8 feet above the finish floor), are provided to illuminate the path of travel along the outside of the Multi-purpose Building, and are visible from Durango Drive during nighttime. Vehicle headlights, streetlights, and exterior and interior building lights also exist in the surrounding area.

The exterior of the proposed buildings would have fiber cement paneling, similar to existing buildings, that are not reflective. Lighting in the proposed buildings and parking lots would also be similar to existing – motion-detected lighting for security and safety purposes, and interior building lighting. As the lights would be motion-activated, they would be off when these areas are unoccupied; the school is intended to primarily operate between dawn to dusk and does not include significant nighttime lighting. There would be no lighting at the field, which is adjacent to the MHPA. Lighting along the western boundary between the adjacent MHPA/preserve area, if any, would be minimal, directed inward toward the school, and shielded from the preserve.

The lights along the eastern parking lot and passenger loading zone are 20 feet in height. The elevation difference between the site and Mira Montana Drive is 25 feet at the north end and 10 feet at the south end. While the lights would extend above the elevation of Mira Montana by 10 feet at the south end, these lights would have shields focusing light down onto the campus. The differing grades between Mira Montana Drive, vegetated slope on the eastern portion of the site, and landscaping would reduce light and glare impacts. Additionally, light and glare levels caused by the proposed project would not be substantially greater than existing levels. Therefore, light and glare impacts would be less than significant.

3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and 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?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

- 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 project site has no agricultural or farm use on it, nor is there agricultural or farm use in its immediate proximity. No project-related farmland conversion impact would occur. The project site is fully developed and is not mapped as important farmland by the Division of Land Resource Protection (CDC 2016). No impact would occur.

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

No Impact. The zoning designation for the project site is RS-1-3. The proposed project would not conflict with agricultural zoning or a Williamson Act contract as it is not zoned for agricultural use. Williamson Act contracts restrict the use of privately-owned land to agriculture and compatible open space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no Williamson Act contract in effect onsite. No impact would occur.

3. Environmental Analysis

- 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. Project development would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits” (California PRC § 12220[g]). Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including trees” (California PRC § 4526). The project site is zoned as RS-1-3. No Impact would occur.

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

No Impact. Vegetation onsite is limited to scattered ornamental trees and shrubs. Project construction would not result in the loss or conversion of forest land. Project development would not cause a loss of forest land. No impact would occur.

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

No Impact. Maps from the Division of Land Resource Protection indicate that there is no important farmland or forest land on the project site or within the surrounding vicinity. Project development would not indirectly cause conversion of such land to nonagricultural or non-forest use. No impact would occur.

3.3 AIR QUALITY

The Air Quality section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthful pollutant concentrations. The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O₃), carbon monoxide (CO), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxides (NO₂), and lead (Pb). Areas are classified under the federal and California Clean Air Act as in either attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The San Diego Air Basin (SDAB), which is managed by the San Diego Air Pollution Control District (SDAPCD), is designated under the California AAQS as a nonattainment area for PM₁₀ and PM_{2.5} and designated under both the California AAQS and the Federal AAQS as nonattainment for O₃ (SDAPCD 2019).

This section analyzes the types and quantities of air pollutant emissions that would be generated by the construction and operation of the proposed project. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the project site, and air quality modeling can be found in Appendix B to this Initial Study.

3. Environmental Analysis

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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

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

Less Than Significant Impact. A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the San Diego Regional Air Quality Strategy (RAQS). The most current RAQS is the 2016 RAQS (SDAPCD 2016). The RAQS fulfills the CEQA goal of informing decision-makers of the environmental efforts of the project under consideration at a stage early enough to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to clean air goals contained in the RAQS. Only new or amended General Plan elements, Specific Plans, and major projects need to undergo a consistency review. This is because the RAQS is based on projections from local General Plans. Projects that are consistent with the local General Plan or do not trigger the San Diego Association of Government's intergovernmental review criteria are considered consistent with the RAQS.

The proposed project involves the redesign and reconstruction of Del Mar Heights School, which is not expected to increase in capacity. Thus, the proposed project would not affect the regional growth projections because the land use is consistent with the City of San Diego's underlying General Plan land use designation and would not require a general plan designation or zoning amendment. Furthermore, the proposed project would also not have the potential to substantially affect housing, employment, and population projections within the San Diego region, which is the basis of the RAQS projections. Therefore, the proposed project would not conflict or obstruct implementation of the RAQS and impacts are less than significant in this regard. No mitigation measures are required.

3. Environmental Analysis

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

Less Than Significant Impact. As stated, the SDAB is designated under the California and Federal AAQS as nonattainment for O₃ and under the California AAQS as nonattainment for PM₁₀, and PM_{2.5} (SDACPD 2019). Any project that produces a significant project-level regional air quality impact in an area that is in nonattainment adds to the cumulative impact. Air quality impacts of the proposed project were evaluated based on the City of San Diego's *California Environmental Quality Act Significance Determination Thresholds* (San Diego 2016a). Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. The following describes project-related impacts from short-term construction activities and long-term operation of the project.

Short-Term Air Quality Impacts

Construction activities would result in the generation of air pollutants. These emissions would primarily be 1) exhaust emissions from powered construction equipment; 2) dust generated by demolition, grading, earthmoving, and other construction activities; 3) motor vehicle emissions and 4) emissions of volatile organic compounds from the application of asphalt, paints, and coatings.

For purposes of this analysis, construction activities are anticipated to occur over an approximately 8.4-acre area. Construction would involve demolition of existing buildings, site preparation, grading, trenching, building construction, asphalt paving, and architectural coating. Construction activities are anticipated to start June of 2020 and end in July of 2021. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2, based on the project's preliminary construction schedule. Results of the modeling are included in Table 3, *Maximum Daily Regional Construction Emissions*. As shown in the table, air pollutant emissions from project-related construction activities would not exceed the County's regional emissions thresholds. Therefore, air quality impacts from project-related construction activities would be less than significant.

Table 3 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lb/day) ^{1,2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Year 2020						
Demolition and Demolition Haul	3	33	22	<1	2	2
Site Preparation	4	43	22	<1	6	4
Grading	2	27	17	<1	3	2
Utility Trenching	<1	2	3	<1	<1	<1
Building Construction 2020	3	27	23	<1	3	2
Year 2021						
Building Construction 2021	3	25	23	<1	3	1
Building Construction 2021 and Paving	4	38	38	<1	3	2
Building Construction 2021, Paving, and Architectural Coating	23	39	41	<1	4	2

3. Environmental Analysis

Table 3 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lb/day) ^{1, 2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Building Construction 2021 and Architectural Coating	21	26	25	<1	3	2
Maximum Daily Construction Emissions						
Maximum Daily Emissions	23	43	41	<1	6	4
City of San Diego Regional Thresholds	137	250	550	250	100	55
Significant?	No	No	No	No	No	No

Source: CalEEMod, Version 2016.3.2, and San Diego 2016a.

Notes:

¹ Air quality modeling based on a construction schedule and information provided by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD of construction equipment and phasing for comparable projects.

² Includes implementation of fugitive dust control measures required by SDAPCD under Rule 55, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street.

Short-Term Interim Phase Air Quality Impacts

During construction of the school, approximately 236 students in kindergarten through 3rd grade that would attend Del Mar Heights School would be temporarily relocated to Del Mar Hills Academy, 0.8 miles away. Approximately 203 students from 4th through 6th grade would be temporarily relocated to Ocean Air School, 5.0 miles away. In order to accommodate these students, four portable classrooms would be added to Del Mar Hills Academy and one would be added to Ocean Air School, which would require minor site preparation and a total of 20 truck trips to install. The installation would result in a nominal increase in emissions that would be substantially less than emissions identified for the reconstruction of Del Mar Heights School. Relocation of these students would also result in a potential increase in VMT. This increase in air pollutant emissions and VMT would be temporary and nominal and would serve the local community by providing close options for school during reconstruction of Del Mar Heights School. Therefore, impacts to the regional air quality associated with the short-term relocation of students would not exceed the City's significance thresholds, and impacts would be less than significant.

Long-Term Operation-Related Impacts

Typical long-term air pollutant emissions generated by a land use would be generated by area sources (e.g., landscape fuel use, aerosols, and architectural coatings), mobile sources from vehicle trips, and energy use (natural gas) associated with the land use. As the proposed project only involves a redesign and reconstruction of the elementary school, it would not result in an increase in student capacity. Furthermore, the proposed buildings would, at minimum, be designed and built to meet the 2019 Building Energy Efficiency Standards and the 2019 California Green Building Standards Code (CALGreen). Thus, these buildings would be substantially more energy efficient than the existing buildings. Thus, operation of the proposed project would not result in an increase in emissions compared to existing conditions and would not exceed the SDAPCD regional significance thresholds. Therefore, impacts to the regional air quality associated with operation of the project would be less than significant.

3. Environmental Analysis

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The significance of localized project impacts depends on whether the project would cause substantial concentrations of criteria air pollutants for which the SDAB is designated as nonattainment under the California or National AAQS.

Localized Impacts

Pursuant to the City of San Diego's *Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality* (San Diego 2016a) project whose stationary source emissions do not exceed or can be mitigated to less than the SDAPCD trigger level or generate 100 pounds per day of fugitive would not be considered to violate an air quality standard or contribute substantially to an existing or projected air quality violation. Projects that exceed these thresholds would be required to conduct an air quality impact analysis to determine the concentrations of stationary emissions at nearby sensitive receptors. As identified above, onsite construction and operation of the proposed project would be substantially below the County's thresholds; and therefore, localized emissions are also less than significant.

CO Hotspots

Prior to 1998, the SDAB was designated as nonattainment for CO under the California AAQS and National AAQS. Concentrations of CO in the SDAB and in the state have steadily declined with the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. In 1998, the SDAPCD was designated as in attainment for CO under both the California AAQS and National AAQS and was under a 10-year federal maintenance plan for CO as a result of its re-designation. The current version of the maintenance plan is the *2004 Revision to the California State Implementation Plan (SIP) for Carbon Monoxide Updated Maintenance Plan for Ten Federal Planning Areas*, which was approved as a SIP revision in January 2006 (CARB 2004).

Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (BAAQMD 2017). As the proposed project would not result in an increase in student capacity, there would be no change in the number of daily trips, which is minimal compared to the aforementioned screening levels. In addition, the potential for CO hotspots to be generated in the SDAB is extremely unlikely because of the improvements in vehicle emission rates and control efficiencies. Typical projects would not expose sensitive receptors to substantial pollutant concentrations and analysis of CO hotspots is not warranted. Furthermore, the proposed project would not increase exposure at the project site from proximity to the surrounding roadways and freeways. Therefore, no significant impacts would occur, and no mitigation measures are required.

Health Risk

Construction

Neither the SDAPCD nor the City of San Diego require a health risk assessment to be conducted for short-term emissions from construction equipment. Emissions from construction equipment primarily consist of

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diesel particulate matter (DPM). The Office of Environmental Health Hazards Assessment (OEHHA) has recently adopted new guidance for the preparation of health risk assessments issued in March 2015. OEHHA has developed a cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. The proposed project would be developed in approximately 14 months, which would limit the exposure to onsite and offsite receptors. Both the SDAPCD and the City currently do not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. In addition, construction activities would not exceed the significance thresholds. For the reasons stated above, it is anticipated that construction emissions would not pose a threat to onsite and offsite receptors at or near the school, and project-related construction health impacts would be less than significant, and no mitigation measures are required.

Operation

The purpose of this environmental evaluation is to identify the significant effects of the proposed project on the environment, not the significant effects of the environment on the proposed project (*California Building Industry Association v. Bay Area Air Quality Management District* [2015] 62 Cal.4th 369 [Case No. S213478]). In general, CEQA does not require an environmental evaluation to analyze the environmental effects of attracting development and people to an area. However, the environmental evaluation must analyze the impacts of environmental hazards on future users when the proposed project exacerbates an existing environmental hazard or condition or if there is an exception to this exemption identified in the Public Resources Code. Schools, residential, commercial, and office uses do not use substantial quantities of TACs and typically do not exacerbate existing hazards, so these thresholds are typically applied to new industrial projects. However, Section 21151.8 of the Public Resources Code requires evaluation of air quality hazards for school site acquisition or construction of a K-12 schools.

The proposed project involves construction of new classroom facilities to replace the existing classroom buildings. In addition, it is within a residential community and is not within a quarter mile of any permitted or non-permitted facilities (e.g., warehousing). Furthermore, there are also no freeways or busy corridors within a quarter mile.¹ Therefore, it is not anticipated that the onsite students and staff would be exposed to an actual or potential endangerment from surrounding emissions sources and carcinogenic and non-carcinogenic impacts would be less than significant. No mitigation measures are required.

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

Less Than Significant Impact. The project site would continue to operate as a school. Therefore, the project would not result in a change in land use that would generate odors. No objectionable odors are anticipated to result from the operational phase of the proposed project. The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms,

¹ Roadways that, on an average day, have traffic in excess of 50,000 vehicles in a rural area, as defined in Section 50101 of the Health and Safety Code, and 100,000 vehicles in an urban area, as defined in Section 50104.7 of the Health and Safety Code.

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petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed project does not fit into these types of facilities and would not generate objectionable odors that would lead to a public nuisance. Furthermore, the project would be required to comply with SDAPCD Rule 51, Public Nuisance, which prohibits the discharge of air contaminants or other materials that would be a nuisance or annoyance to the public. Therefore, operational odor impacts would be less than significant.

During construction activities, construction equipment exhaust, application of asphalt and architectural coatings would temporarily generate odors. However, any construction-related odor emissions would be low in concentration, temporary, and are not expected to affect a substantial number of people. Odors would not be objectionable and constitute a public nuisance. Impacts associated with construction-generated odors would be less than significant and no mitigation measures are required.

3.4 BIOLOGICAL RESOURCES

The analysis in this section is based in part on the following:

- *Del Mar Heights Elementary School Rebuild Project*, Alden Environmental, Inc., February 10, 2020

A complete copy of the search results is included in Appendix C to this Initial Study.

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			X	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				X

- 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?**

Less Than Significant Impact. The project site is currently developed with a school and is within a developed portion of the City. The project site includes 0.8 acre of Southern Maritime Chaparral and 0.6 acre of disturbed land, in addition to 1.3 acres of ornamental vegetation (Alden 2020). Three sensitive plant species were observed in the project area, Torrey pine, wart-stemmed ceanothus, and Nutshell's scrub oak, all of which are considered sensitive by the California Native Plant Society, but none are threatened or endangered on state or federal lists (Alden 2020). Wart-stemmed ceanothus and Nutshell's scrub oak are located within the Southern Maritime Chaparral outside of the project site; Torrey pines are scattered within the ornamental landscaping on the project site (Alden 2020). The Torrey pines on the project site are considered ornamental in nature, as they have been planted from nursery stock, and are therefore not considered to be sensitive (Alden 2020). Figure 9, *Biological Resources*, shows the existing vegetation types, as well as the drainage improvements proposed for the project site.

One state-listed endangered species, short-leaved dudleya, was reported to the California Natural Diversity Database in 2016 in two locations in the vicinity of the project site: in Canyon Crest Open Space Park, northwest of the site, and in the extension of Torrey Pines State Natural Reserve south and west of the site (Alden 2020). Short-leaved dudleya can occur in southern maritime chaparral (and coastal scrub) where Torrey sandstone soil is present on open, flatter areas. While Southern Maritime Chaparral is present in the project area, the project area occurs on developed/disturbed areas and does not support suitable habitat for this species. Therefore, no impact would occur.

Development of the proposed project would remain almost entirely within the fenced limits of the existing school, with the exception of a portion of land adjacent to the stormwater outfalls to be repaired. The repair of one of the outfalls, located along the southern project boundary, would encroach slightly into the adjacent sensitive Southern Maritime Chaparral (see Table 2 and Figure 3 of Appendix C) (Alden 2020). Figure 10, *Slope Restoration Site 1*, and Figure 11, *Slope Restoration Site 2*, show the locations of the outfalls. This encroachment would be temporary and less than 0.01 acre. The repair is designed to prevent further erosion and degradation of the habitat. The repair would include filling in the deep erosional gullies that have formed and installing rip-rap energy dissipators to minimize erosion offsite. Additionally, the use of jute-netting or straw blankets on all the limits of reconstructed slope would be added to stabilize the slope as new plants take time to establish. Upon completion, the outfalls would be revegetated with a mix of native species appropriate for the surrounding area, such as but not limited to, *Baccharis pilularis* 'Pigeon Plant,' *Arctostaphylos*, *Encelia farinosa*,

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Malosma laurina, *Penstemon centranthifolius*, *Rhus integrifolia*, *Rhus ovata*, *Salvia leucophylla*, and *Zauschneria californica*, as well as a native hydroseed mix. The revegetation would help avoid future erosion and contribute to the biological value of the adjacent area. A biweekly maintenance schedule will be established to weed and remove all possible invasive plant species. The stormwater would be treated via three bioretention basins before exiting the outfalls; therefore, untreated stormwater would not drain into the MHPA. This impact is considered less than significant (Alden 2020).

No sensitive animal species were observed onsite, and given the site's disturbed, developed, and landscaped condition, none are expected to occur (Alden 2020). Additionally, the adjacent Southern Maritime Chaparral habitat is not considered to be suitable for the federal-listed threatened and State Species of Special Concern coastal California gnatcatcher. This is due to the species' sensitivity to noise. Additionally, the adjacent habitat is not considered suitable as it is dominated by chaparral habitat and this species occurs within Diegan coastal sage scrub habitat, which does not occur onsite (Alden 2020).

As described in Section 1.5, *Project Description*, and evaluated in Section 3.1, *Aesthetics*, potential light impacts on the adjacent habitat would be limited. The project does not propose any field lighting, which is adjacent to the MHPA. Campus lighting for safety and security would be restricted by time and motion-detection systems. Most of the school's activities are intended to occur primarily from dawn to dusk. Evening events would not extend beyond 9 PM and lights are off when buildings and pathways are unoccupied. Lighting for evening events at the school during winter months would involve the longest period and that would extend only from approximately 5 PM to 9 PM. This is unchanged from the current condition. Lighting along the boundary between the school and the adjacent MHPA, if any, would be minimal, directed inward toward the school, and shielded from the MHPA. No sensitive vegetation communities or sensitive species would be impacted; impacts would be less than significant.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The project site is developed with an existing school. No riparian habitats were observed onsite that would be considered jurisdictional by regulatory agencies (Alden 2020). As such, no impacts would occur.

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

No Impact. The project site is currently developed with an existing school. No wetland or drainage areas were observed on the project site that would be considered jurisdictional by regulatory agencies (Alden 2020). Therefore, no impacts would occur to wetlands or drainage areas.

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- 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?**

Less Than Significant Impact. The project site is adjacent to the City of San Diego's MHPA; however, all impacts would occur outside of the MHPA, within the existing school limits (Alden 2020). Therefore, no permanent or temporary direct impacts to wildlife corridors would occur. Additionally, the project design includes measures specifically intended to avoid impacts to the adjacent MHPA. The ornamental landscaping onsite and the sensitive habitat located to the west and south of the project site have the potential to support nesting bird species. The project would comply with the MBTA bird nesting season restrictions and therefore would not result in impacts to nesting regulatory birds protected by the MBTA (Alden 2020). Therefore, impacts would be less than significant.

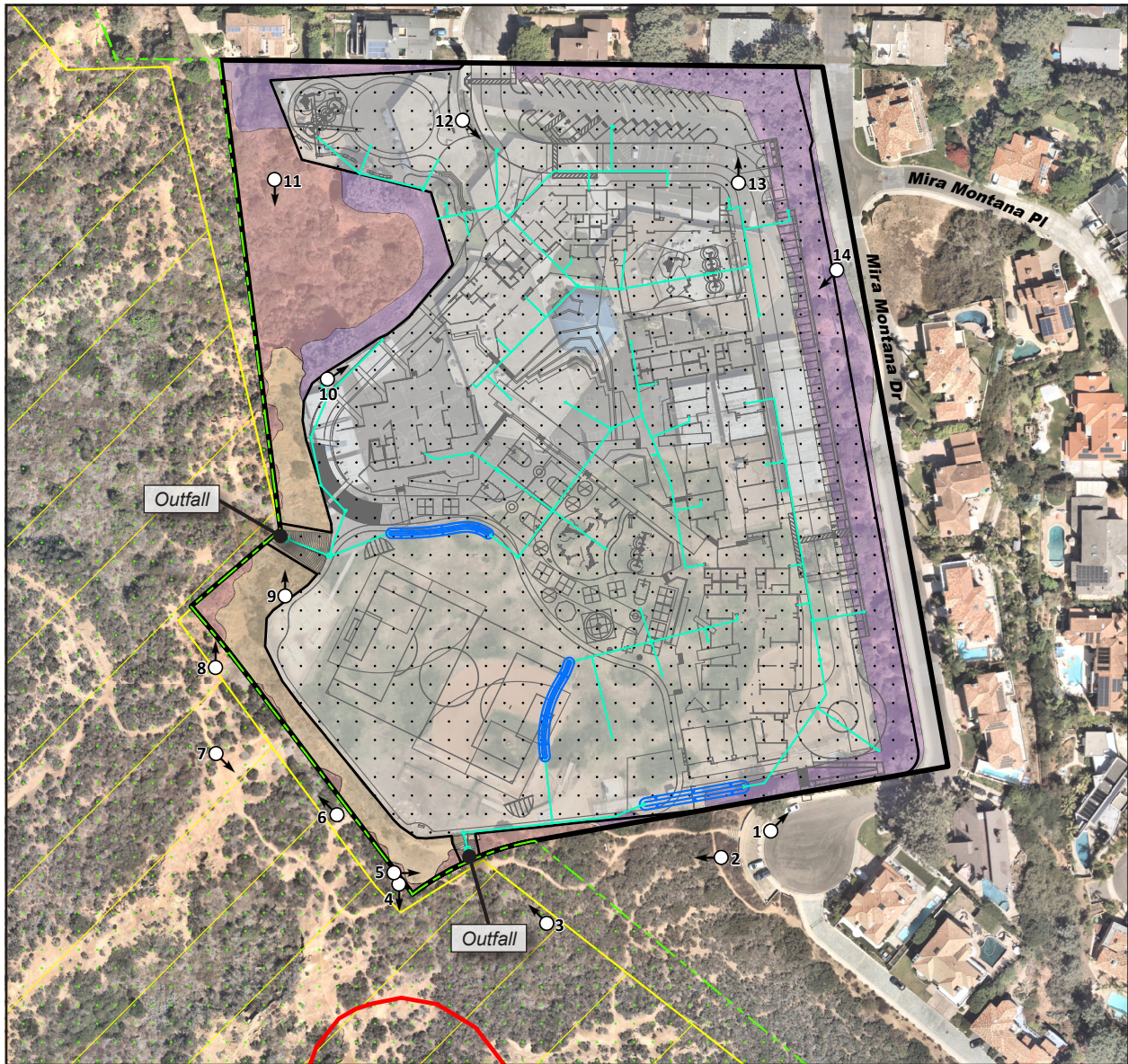
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

No Impact. Chapter 6, Public Works and Property, Public Improvement and Assessment Proceedings, Article 2, Public Rights-of-Way and Land Development, Division 6, of the City of San Diego Municipal Code protects trees in the public rights-of-way. The proposed project would occur within the project site boundaries, which is District-owned property. No impact to City trees would result. Therefore, no impacts would occur.

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

No Impact. The project site is located adjacent to the City of San Diego's MHPA. All impacts would occur within the existing footprint of the school site, outside the MHPA. Therefore, no direct impacts would occur.

Figure 9 - Biological Resources
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- Project Boundary
- Site Photos are Provided in Appendix C
- Project Impacts
- Storm Drain
- Bioretention Basin
- Energy Dissipator (Rip-rap)
- City of San Diego Multi-Habitat Planning Area (MHPA)
- Torrey Pines State Reserve Extension
- CNDDDB Record for Short-leaved Dudleya (*Dudleya brevifolia*)

Vegetation

- Southern Maritime Chaparral
- Ornamental
- Disturbed Land
- Developed

0 175
Scale (Feet)



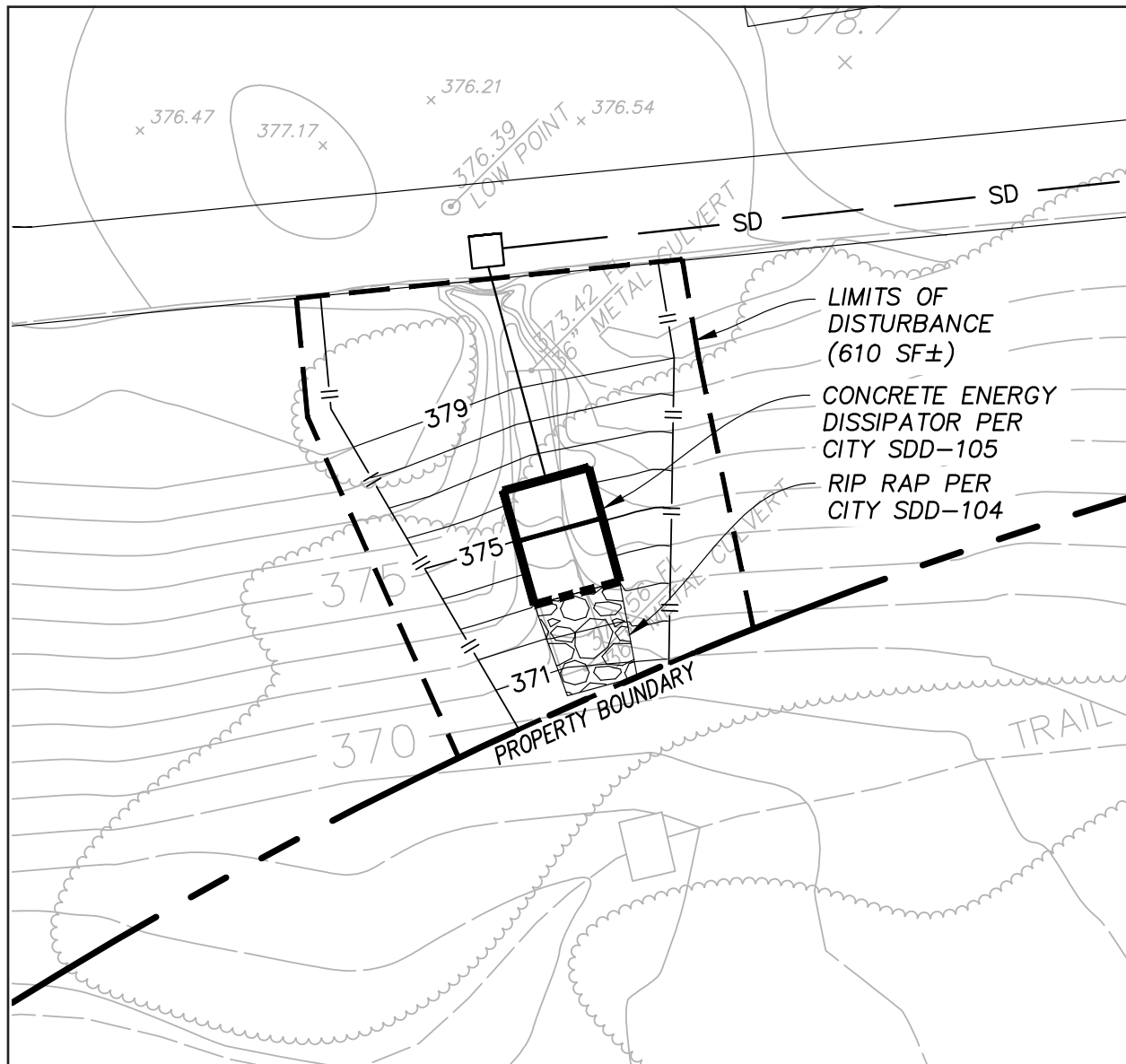
Source: Alden Environmental, Inc, 2020

PlaceWorks

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Figure 10 - Slope Restoration Site 1
3. Environmental Analysis



*Slopes at existing outfalls to be restored to original condition and native plantings provided.

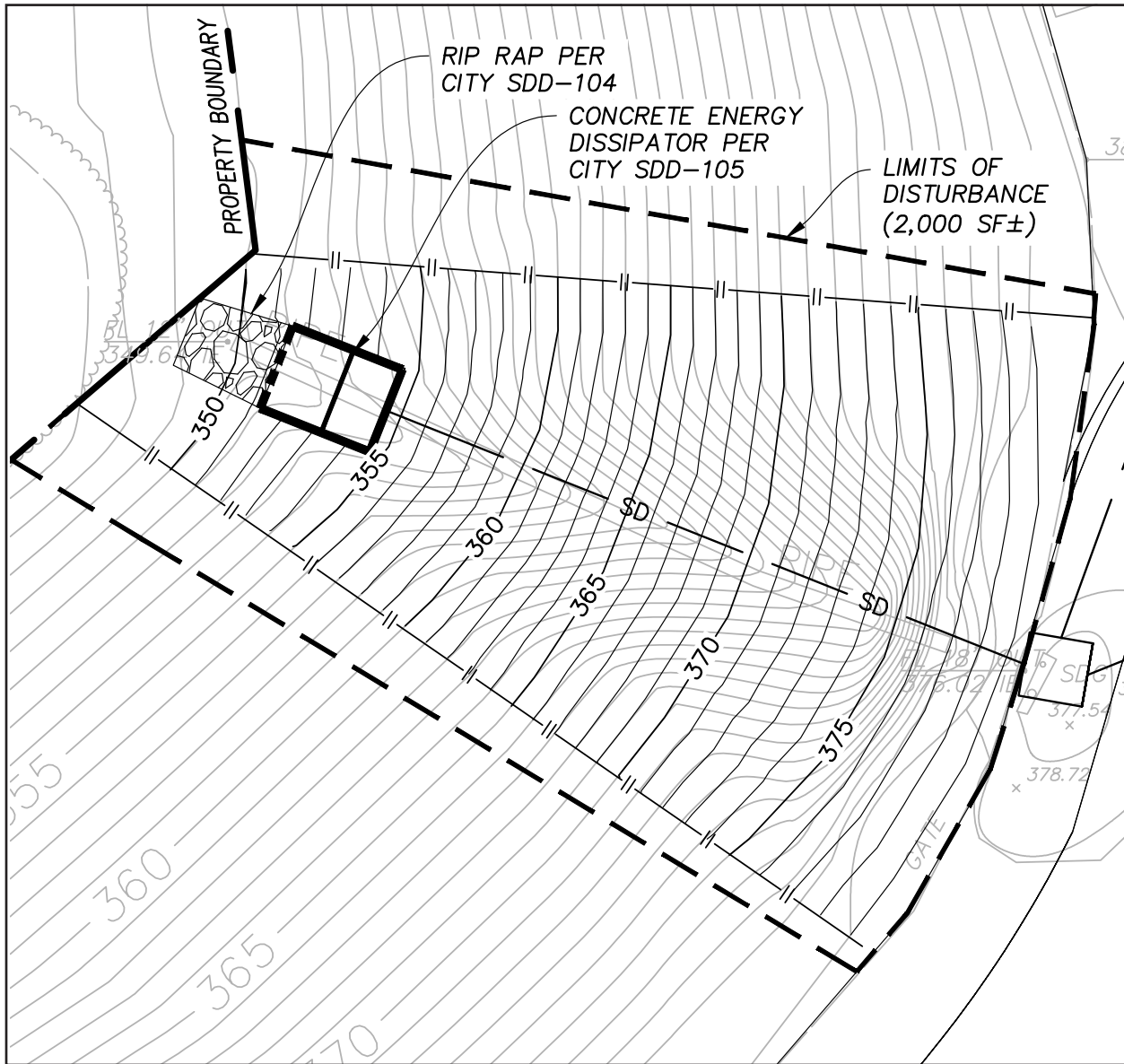
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Scale (Feet)



3. Environmental Analysis

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Figure 11 - Slope Restoration Site 2
3. Environmental Analysis



*Slopes at existing outfalls to be restored to original condition and native plantings provided.

0 10
Scale (Feet)



3. Environmental Analysis

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3. Environmental Analysis

3.5 CULTURAL RESOURCES

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

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

No Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally a resource is considered “historically significant” if it meets one of the following criteria:

- i) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- ii) Is associated with the lives of persons important in our past;
- iii) Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;
- iv) Has yielded, or may be likely to yield, information important in prehistory or history.

The project site contains Del Mar Heights School; the project site is not identified as a state or national historic resource. Construction of the proposed project would be within the footprint of the project site’s fence line. Therefore, there would be no impacts to historical resources.

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

Less Than Significant Impact With Mitigation Incorporated. According to the Torrey Pines Community Plan, the Torrey Pines community contains over 25 prehistoric and historic archaeological sites recorded as of 1981 (San Diego 2014). The Torrey Pines Community Plan identifies the Sorrento Valley/Los Peñasquitos Lagoon area as the site of the prehistoric Indian Village of Ystagua, which has archaeological remnants unique to the area. According to Figure 5, *Resource Zoning Areas*, of the Torrey Pines Community Plan, the project site

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is not located in the Sensitive Coastal Resource (SCR) zone or area subject to the Resource Protection Ordinance. Moreover, the project site is fully developed with no visible native ground surface exposed. Implementation of CUL-1 would ensure that if resources are discovered during ground disturbing activities that resources would be recovered in accordance with state and federal requirements. In the event that archeological resources are discovered, a halt-work condition would be implemented, and a qualified archaeologist would be retained to assess such findings. Implementation of Mitigation Measure CUL-1 would reduce impacts to archaeological resources to a less than significant level.

Mitigation Measures

CUL-1 Prior to issuance of grading permits, a qualified archaeological monitor shall be identified to be on call during ground-disturbing activities. If archeological resources are discovered during excavation and/or construction activities, construction shall stop within 25 feet of the find, and the qualified archaeologist shall be consulted to determine whether the resource requires further study. The archaeologist shall make recommendations to the District to protect the discovered resources. Archaeological resources recovered shall be provided to the South Central Coastal Information Center and San Diego Natural History Museum, or any other local museum or repository willing and able to accept and house the resource to preserve for future scientific study.

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

Less Than Significant Impact. The project site is currently developed and would require grading and other ground disturbing activities. California Health and Safety Code Section 7050.5 requires that if human remains are discovered on a project site, disturbance of the site shall halt until the coroner has conducted an investigation into the circumstances, manner, and cause of death, and has made recommendations concerning their treatment and disposition to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and has reason to believe they are Native American, he or she shall contact the NAHC by telephone within 24 hours. Impacts to human remains would be less than significant.

3.6 ENERGY

The analysis in this section is based in part on the following:

- *Energy Calculations*, PlaceWorks., October 2019

A complete copy of the search results is included in Appendix D to this Initial Study.

Would the project:

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

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

Less Than Significant Impact. The following discusses the potential energy demands from construction activities associated with the development of the proposed project and its operation.

Short-Term Construction

Construction of the proposed project would create temporary increased demands for electricity and vehicle fuels compared to existing conditions and would result in short-term transportation-related energy use. Energy consumption during construction (2020 through 2021) was calculated using fuel usage data from EMFAC2017, Version 1.0.2., and OFFROAD2017, Version 1.0.1, and the results are shown in Table 4.

Table 4 Construction-Related Fuel Usage

Project Component	Gas		Diesel		Electricity	
	VMT	Gallons	VMT	Gallons	VMT	kWh
Construction Worker Commute	455,394	16,933	3,416	83	4,440	1,476
Construction Vendor Trips	8,852	1,869	108,871	14,771	0	0
Construction Truck Haul Trips	8	2	7,641	1,232	0	0
Construction Off-Road Equipment	N/A	0	N/A	32,289	N/A	0
Total	464,254	18,804	119,928	48,375	4,440	1,476

Source: CalEEMod Version 2016.3.2; EMFAC2017 Version 1.0.2; OFFROAD2017 Version 1.0.1

Notes: VMT=vehicle miles traveled; kWh=kilowatt hour

Construction of the proposed project would create temporary increased demands for electricity and vehicle fuels. It is not anticipated that construction equipment used for the proposed project would be powered by natural gas and no natural gas demand is anticipated during construction. Construction activities associated with the proposed project would require electricity use to power the construction equipment. The electricity used during construction would vary during different phases of construction, where the majority of construction equipment during demolition, site preparation, trenching, and grading would be gas-powered or diesel-powered, and the later construction phases, such as architectural coatings, could require electric-powered equipment. Overall, the use of electricity would be temporary in nature and would fluctuate according to the phase of construction. Additionally, it is anticipated that the majority of electric-powered construction

3. Environmental Analysis

equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities.

Transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy used during construction would come from the transport and use of construction equipment, delivery vehicles, and construction employee vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would fluctuate according to the phase of construction and would be temporary. Upon completion of project construction, all construction-equipment would cease. Furthermore, the construction contractors are anticipated to minimize non-essential idling of construction equipment during construction in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9 (SCAQMD 2014). Such required practices would limit wasteful and unnecessary energy consumption. Therefore, overall, it is expected that construction energy usage associated with the proposed project would not be any more inefficient, wasteful, or unnecessary than similar projects and impacts would be less than significant with respect to construction-related energy demands.

Long-Term Operation

Electrical and natural gas services to the proposed project would be provided by San Diego Gas and Electric (SDG&E) through connections to existing offsite electrical lines and new onsite infrastructure. During operation, energy would be used for heating, cooling, and ventilation of the buildings; water heating; onsite equipment; appliances; indoor, outdoor, and perimeter lighting; and security systems. The proposed project involves the redesign and reconstruction of the existing elementary school onsite. While the overall total building square footage would increase from 52,406 square feet to 66,823 square feet after project implementation, the proposed new buildings that would replace the existing buildings would be required to comply with the Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen). Thus, the new buildings would be more energy efficient than the existing buildings that would be replaced. Additionally, because the proposed project would be consistent with the requirements of these energy-related regulations, it would not result in wasteful or unnecessary electricity or natural gas demands. Furthermore, because the proposed project is not anticipated to increase student or adult staff capacity for the schools, implementation of the proposed project would not generate new vehicle trips and would not result in additional vehicle fuel usage compared to existing conditions. In fact, the project would decrease transportation-related energy by increasing the drop-off zone on-campus to 41 vehicles and increasing on-campus parking by 32 spaces. Making the flow of traffic more efficient would decrease congestion and the excessive idling that now occurs. Therefore, operation of the proposed project is not anticipated to increase the demand for electricity, natural gas, and transportation energy compared to existing conditions and impacts would be less than significant.

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

No Impact. The state's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the state's renewable portfolios standard (RPS) to 33

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percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. Senate Bill 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures. On September 10, 2018, Senate Bill 100 (SB 100) was signed and raised California’s RPS requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also established a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

The statewide RPS goal is not directly applicable to individual development projects, but to utilities and energy providers such as SDG&E, which is the utility that would provide all of electricity needs for the proposed project. Compliance of SDG&E in meeting the RPS goals would ensure the State in meeting its objective in transitioning to renewable energy. Additionally, the proposed project would comply with the Building Energy Efficiency Standards and CALGreen. Therefore, implementation of the proposed project would not conflict or obstruct plans for renewable energy and energy efficiency.

3.7 GEOLOGY AND SOILS

The analysis in this section is based on the following technical report:

- *Geological and Environmental Hazards Assessment Report – Del Mar Heights School Rebuild*, PlaceWorks, October 2019

A complete copy of this study is included as Appendix E to this Initial Study.

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of 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.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
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?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

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.**

Less Than Significant Impact. According to the Geological and Environmental Assessment (GEHA), the project site is not in an Alquist-Priolo Earthquake Fault Zone and no fault traces are depicted on the site and the nearest faults are offshore. Therefore, impacts would be less than significant.

ii) **Strong seismic ground shaking?**

Less Than Significant Impact. As stated in 3.7.a.i, above, the project site is not on a known fault zone or within an earthquake fault zone. According to the GEHA, the Rose Canyon Fault is approximately 3 miles to the southwest and the Coronado Bank Fault is approximately 17 miles to the southwest. Therefore, impacts would be less than significant.

iii) **Seismic-related ground failure, including liquefaction?**

Less Than Significant Impact. Liquefaction refers to loose, saturated sand, or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based upon three main contributing factors: 1) cohesionless, granular soils having relatively low densities (usually of Holocene age); 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking. According to the GEHA, liquefaction is unlikely at the project site. Additionally, all structures would be built to adhere to the 2019 California Building Code (CBC) which provides minimum

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standards to protect property and public welfare by regulating design and construction to mitigate the effects of adverse soil conditions. Therefore, impacts would be less than significant.

iv) Landslides?

Less Than Significant Impact. Landsliding is a type of erosion in which masses of earth and rock move downslope as a single unit. According to the GEHA, the site has a low to moderate risk for landslides; the site is relatively level and is located on a terrace and no landslides have been mapped on the site. Furthermore, all structures on the site would comply with the 2019 CBC which provides minimum standards to protect property and public welfare by regulating design and construction to mitigate the effects of adverse soil conditions.

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

Less Than Significant Impact. Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved, and removed from one place and transported to another. The project site is an existing school site with paved and impervious surfaces (parking lot, buildings) as well as pervious surfaces (turf field, vegetation). The project site would implement structural and nonstructural best management practices before and during construction to control surface runoff and erosion to retain sediment on the project site. Once the proposed project is constructed, soil erosion would be controlled with improvements installed on the project site. Therefore, a less than significant impact would occur.

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

Less Than Significant Impact. As discussed in 3.7.a.iii and iv, the project site is not in a liquefaction zone and has a low to moderate risk of landslides. Lateral spreading is a phenomenon where large blocks of intact, non-liquefied soil move downslope on a large liquefied substratum; the mass moves toward an unconfined area, such as a descending slope or stream-cut bluff and has been known to move on slope gradients as little as one degree. The topography of the site is relatively flat, and therefore, impacts from lateral spreading would be less than significant.

Subsidence of basins attributed to overdraft of groundwater aquifers or over pumping of petroleum reserves has been reported in various parts of southern California. The proposed project would not require the withdrawal of groundwater from the site. Impacts to subsidence would be less than significant.

Implementation of CBC and other related construction standards apply seismic requirements and address certain grading activities. The CBC includes common engineering practices requiring special design and construction methods that reduce or eliminate potential expansive soils-related impacts. Compliance with CBC regulations would ensure adequate design and construction of building foundations to resist soil movement. Therefore, impacts would be less than significant.

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- 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?**

Less Than Significant Impact. Expansive soils swell when they become wet and shrink when they dry out resulting in the potential for cracked building foundations. All structures built onsite would adhere to the 2019 CBC. Additionally, since the site would be part of a school site, the California Geological Survey and Division of the State Architect would ensure that the buildings are sufficiently mitigated for the condition. Therefore, the project site would not have less than significant impacts on exposing people or the proposed structures to adverse effects associated with expansive soils.

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

No Impact. The proposed project would not require the installation of a septic tank or alternative wastewater disposal system but would not utilize the local sewer system. Therefore, no impacts would result from soil conditions in relation to septic tanks or other on-site water disposal systems.

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

Less Than Significant Impact With Mitigation Incorporated. The project site is currently developed. The proposed project would require limited grading and other ground disturbing construction activities to accommodate the construction of the proposed project and utility requirements. Due to the ground disturbance associated with construction, there is potential that natural landform beneath the site would be encountered during construction and that subsurface resources and/or paleontological resources would be discovered. Implementation of Mitigation Measure GEO-1 would ensure that if resources are discovered during ground disturbing activities that resources would be recovered in accordance with state and federal requirements. Implementation of Mitigation Measure GEO-1 would reduce impacts to paleontological resources to a less than significant level.

Mitigation Measures

- GEO-1** Prior to construction, a field survey for paleontological resources shall be conducted by a qualified paleontologist. If unique paleontologist resources are not discovered during the field survey, then excavation and/or construction activities can commence. If unique paleontological resources are discovered during excavation and/or construction activities, construction shall stop within 25 feet of the find, and the qualified paleontologist shall be consulted to determine whether the resource requires further study. The paleontologist shall make recommendations to the District to protect the discovered resources. Any paleontological resources recovered shall be provided to the South Central Coastal Information Center and San Diego Natural History Museum, or repository willing and able to accept and house the resource to preserve for future scientific study.

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3.8 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHG—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.^{2, 3}

This section analyzes the project’s contribution to global climate change impacts in California through an analysis of project-related GHG emissions. Information on manufacture of cement, steel, and other “life-cycle” emissions that would occur as a result of the project are not applicable and are not included in the analysis.⁴ A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix B to this Initial Study.

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations

² Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant.

³ Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities (CARB 2017a). However, state and national GHG inventories do not yet include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

⁴ Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

3. Environmental Analysis

Would the project:

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

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

Less Than Significant Impact. Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Annual average construction emissions were amortized over 20 years⁵ to reflect estimated building lifetime (SBTF 2003). Because the project involves the redesign and reconstruction of the elementary school with no increase in student capacity, and the project would replace the existing classroom buildings with new, more energy efficient structures, overall operation of the proposed project would not result in an increase in emissions compared to existing conditions. Thus, implementation of the proposed project would result in an overall net change in GHG emission from the construction emissions distributed over the estimated 20-year building lifetime. As shown in Table 5, *Project-Related Operation GHG Emissions*, the estimated net change in GHG emissions resulting from implementation of the proposed project would be 38 MTCO₂e per year and would not exceed the bright-line threshold of 900 MTCO₂e per year. Therefore, GHG emissions generated by the project are considered less than significant and no mitigation measures are required.

⁵ The use of a 20-year building lifetime does not reflect its actual useful life, but rather, it is done for the analysis as it provides a worst-case outcome, yet it is still not significant.

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Table 5 Project-Related Operation GHG Emissions

Source	GHG (MTCO ₂ e/Year)
Year 2020	348
Year 2021	422
Total	769
Amortized Construction Emissions ¹	38
San Diego County GHG Bright-Line Threshold	900 MTCO ₂ e/Yr
Exceeds Bright-Line Threshold?	No

Source: CalEEMod, Version 2016.3.2. Totals may not equal to the sum of the values as shown due to rounding
Notes: MTons: metric tons; MTCO₂e: metric ton of carbon dioxide equivalent
¹ Total construction emission are amortized over 20 years to represent a conservative estimate of building lifetime (SBTF 2003).

Short-Term Interim Phase Greenhouse Gas Impacts

As previously mentioned, approximately 236 students would be temporarily relocated to Del Mar Hills Academy 0.8 miles away and approximately 203 to Ocean Air School 5.0 miles away. Four portable classrooms would be added to Del Mar Hills Academy and one would be added to Ocean Air School to accommodate these students, which would require minor site preparation and a total of 20 truck trips to install. The installation would result in a nominal increase in GHG emissions that would be substantially less than emissions identified for the reconstruction of Del Mar Heights School. Relocation of these students would also result in a potential increase in VMT. This increase in GHG emissions and VMT would be temporary and nominal and would serve the local community by providing close options for school during reconstruction of Del Mar Heights School. Therefore, GHG emissions associated with the short-term relocation of students would not be less than significant.

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

No Impact. The following state and regional GHG reduction plans have been adopted:

CARB Scoping Plan

CARB's Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by Assembly Bill (AB) 32, which is to return to 1990 emission levels by year 2020 (CARB 2008). The CARB Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Since adoption of the 2008 Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard (LCFS), California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy

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(CAFE) standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of AB 32. New buildings are required to comply with the latest Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen). On December 24, 2017, CARB adopted the Final 2017 Climate Change Scoping Plan Update to address the new 2030 target to achieve a 40 percent reduction below 1990 levels by 2030, which was established by Senate Bill 32 (SB 32) (CARB 2017b). While measures in the Scoping Plan apply to State agencies and not the proposed project, the project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32 and SB 32 were adopted. Therefore, the proposed project would be consistent with the CARB Scoping Plan, and no impact would occur.

SANDAG's San Diego Forward: The Regional Plan

The California legislature passed Senate Bill 375 (SB 375) to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. The San Diego Association of Governments (SANDAG) adopted San Diego Forward: The Regional Plan (Regional Plan), which is the region's SCS, on October 8, 2015. The SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency for governments and developers. The proposed project would construct replacement school facilities at the existing school and is consistent with the underlying General Plan land use designation. Furthermore, implementation of the proposed project would result in the reduction of up to 48 average daily trips compared to existing conditions. Thus, the proposed project would not interfere with SANDAG's ability to implement the regional strategies outlined in The Regional Plan. The proposed project would not have the potential to interfere with the State of California's or SANDAG's ability to achieve GHG reduction goals and strategies. Therefore, no impact would occur.

3.9 HAZARDS AND HAZARDOUS MATERIALS

The analysis in this section is based in part on the following:

- *Phase I Environmental Site Assessment (ESA) - Del Mar Heights Elementary School Rebuild Project*, PlaceWorks, October 2019

A complete copy of the search results is included in Appendix F to this Initial Study.

Would the project:

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

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. Project construction would require small amounts of hazardous materials, including fuels, greases and other lubricants, and coatings such as paint. The handling, use, transport, and disposal of hazardous materials by the construction phase of the project would comply with existing regulations of several agencies—the EPA, Occupational Safety and Health Administration (OSHA), California Division of Occupational Safety and Health (Cal/OSHA), and the US Department of Transportation (DOT). The proposed project would operate as an elementary school. Project maintenance may require the use of cleaners, solvents, pesticides, and other custodial products that are potentially hazardous. These materials would be used in relatively small quantities, clearly labeled, and stored in compliance with state and federal requirements. Additionally, the District’s Integrated Pest Management (IPM) Plan focuses on long-term pest prevention, while minimizing pesticide exposure to people and the environment. With the exercise of normal safety practices, the project would not create substantial hazards to the public or the environment. Therefore, a less than significant impact would occur.

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- 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?**

Less Than Significant Impact. Construction projects typically maintain supplies onsite for containing and cleaning small spills of hazardous materials. However, construction activities would not involve a significant amount of hazardous materials, and their use would be temporary. Furthermore, project construction workers would be trained on the proper use, storage, and disposal of hazardous materials. Operation of the site would continue as existing conditions and would not warrant use of hazardous materials in quantities that could result in conditions.

Based on the Phase I ESA, the project site remained undeveloped and vacant land until approximately 1959 when the earliest existing Del Mar Heights School buildings were originally constructed on the project site. Recognized Environmental Conditions (RECs), Historical RECs, and Controlled RECs were not identified on the site. According to the Phase I report, soil sampling, which was conducted to assess the presence of residual pesticides and lead, indicated that the residual pesticide and lead in the soil do not pose a human health risk. Therefore, impacts would be less than significant.

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

No Impact. There are no schools located within 0.25-mile of the project site. Furthermore, the project site would operate as an elementary school and would not emit hazardous emissions or handle hazardous materials or substances. Therefore, no impact would occur.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Less Than Significant Impact. According to the Phase I report, several databases were utilized to identify if the project was listed on these databases; the project site was listed on HAZNET as the school had materials containing polychlorinated biphenyls (PCBs), 0.17 tons of organic liquid, and 20.22 tons of asbestos containing waste transported off-site for proper disposal under manifest. The project site was not listed on EnviroStor or GeoTracker (DTSC 2019; SWRCB 2015). Therefore, impacts would be less than significant.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

No Impact. The project site is not within two miles of a public use airport; the McClellan-Palomar Airport is approximately 12 miles to the north in the Carlsbad, CA. Therefore, no impacts would occur.

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

Less Than Significant Impact. The proposed project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project site and surrounding properties during construction and post-construction. The proposed project would improve parking and queuing onsite, thereby reducing congestion on the surrounding roadways, and would provide a 20-foot wide fire access lane around the entire campus. Additionally, both the City Fire Marshal and DSA would be required to approve fire access around the site. As part of the DSA process, a Fire and Life Safety Review would be conducted when DSA would review building construction and how occupants can safely exit the buildings in case of a fire. The proposed project would not result in inadequate emergency access, and impacts would be less than significant.

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

Less Than Significant Impact. The project site is located in a very high fire hazard severity zone (VHFHSZ) (CAL FIRE 2009). The proposed project would increase impervious surfaces onsite, and therefore, the project and site conditions would not contribute to an increase in exposure to wildfire risk. Additionally, because the project site, as with other portions of the City are located within the VHFHSZ, development on the site would be subject to compliance with California Building Code (CBC) and the County's required defensible space requirement. The buildings would be designed to meet the CBC's Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure, standards; the roofing and exterior coverings would be constructed of Class A non-combustible materials; exterior glazing would be fire resistant; and fire hydrants would be provided around the site to meet current code. Moreover, the entire campus would be equipped with an automatic fire sprinkler system. By complying with the California Building and Fire Codes, as well as the defensible space requirements, impacts would be less than significant.

3.10 HYDROLOGY AND WATER QUALITY

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 which would:				
i) result in a substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The project site is within the jurisdiction of the San Diego Regional Water Quality Control Board (RWQCB). Drainage and surface water discharges during construction and operation of the proposed project would not violate any water quality standards or waste discharge requirements. However, site preparation and other soil-disturbing activities during construction of the project could temporarily increase the amount of soil erosion and siltation entering the local stormwater drainage system.

The proposed project would disturb approximately 8.4 acres. Pursuant to Section 402 of the Clean Water Act, the US Environmental Protection Agency has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct stormwater discharges. In California, the State Water Resources Control Board administers the NPDES permitting program and is responsible for developing permitting requirements. The NPDES program regulates industrial pollutant discharges, including construction activities for sites larger than one acre. Since implementation of the proposed project would disturb more than one acre, the proposed project would be subject to the NPDES Construction General Permit requirements (Order No. 2009-0009-DWQ).

Construction

Clearing, grading, excavation, and construction activities associated with the project have the potential to impact water quality through soil erosion and increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials such as fuels, solvents, and paints may present a risk to surface water quality. To minimize these potential impacts, the proposed project would be required to comply with the NPDES

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Construction General Permit as well as the best management practices (BMPs) to control erosion and prevent any discharge of sediments from the site to reduce potential impacts to less than significant levels.

Operation

For site operations, structural BMPs, including swales and landscape planters, would reduce runoff. Therefore, a less than significant impact to water quality standards would occur.

The proposed project would also be required to comply with applicable federal, state, and local regulations. Provided that the standard BMPs are implemented, the proposed project would not substantially degrade water quality. A less than significant impact would occur.

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

Less Than Significant Impact. The proposed project does not propose groundwater wells that would extract groundwater from an aquifer, nor would the proposed project affect recharge capabilities for the basin, as there are no wetlands onsite. Therefore, a less than significant would occur.

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 which would:

i) Result in a substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The proposed project would not alter the course of a stream or river. Construction of the project would increase the potential for erosion and siltation. However, the proposed project would include BMPs such as swales and landscape planters which would reduce runoff, and improvements would be constructed over a short period of time. Therefore, a less than significant impact would occur.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less Than Significant Impact. The proposed project would not alter the course of a stream. Project implementation would increase impervious surfaces on site, however, the use of BMPs and compliance with local, state, and federal regulations would ensure that drainage patterns and stormwater runoff are maintained. Therefore, a less than significant impact would occur.

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

Less Than Significant Impact. Project implementation would increase impervious surfaces onsite, however, the proposed BMPs would reduce impacts associated with impervious surfaces. The proposed project would be required to comply with local, state, and federal regulations pertaining to stormwater.

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Therefore, the proposed project would not exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The project site is developed with an existing school. The proposed project would take place within the footprint of the project site, which is within Zone X, Area of Minimal Flood Hazards (Flood Insurance Rate Map ID #06073C1328G and #06073C1309G)) (FEMA 2012). Since the likelihood of floods in the project area is low, the proposed project would have a less than significant impact on impeding or redirecting flood flows.

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

Less Than Significant Impact. A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam or other artificial body of water. Although there are no large water tanks in the area that could impact the proposed project site, there are dams in the region that could create flooding impacts. Thirteen dams in the greater Los Angeles area moved or cracked during the 1994 Northridge earthquake. However, none were severely damaged. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act.

A tsunami is earthquake-induced flooding that is created from a large displacement of the ocean floor. The site is approximately 0.7-mile east of the Pacific Ocean and is not in a tsunami inundation area (CDC 2009). The project is not at risk for tsunami impacts.

A mudflow is a landslide event in which debris, land mass, and soils are saturated during their displacement. The project site is relatively flat, with no slopes near the site that are capable of generating a mudflow. No mudflow impacts would occur.

Provided that standard BMPs are implemented, the proposed project would not substantially degrade water quality. As impacts related to the occurrence of site inundation by seiche, tsunami, or mudflow are less than significant, the release of pollutants would be less than significant.

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

Less Than Significant Impact. The proposed project would not obstruct or conflict with the implementation of a water quality control plan or sustainable water management plan. The proposed project would comply with the water quality and use requirements of these plans through the implementation of BMPs. Therefore, impacts would be less than significant.

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3.11 LAND USE AND PLANNING

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
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?			X	

a) Physically divide an established community?

No Impact. The project site is surrounded by residential uses and open space canyonlands. The proposed project consists of rebuilding school buildings within the fence line of the project site boundaries and would not divide an established community. Therefore, no impact would occur.

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

Less Than Significant Impact. The project site is currently zoned RS-1-3 and the existing land use designation is Institutional and Public and Semi-Public Facilities. Implementation of the proposed project would not change the zoning or land use designations of the site. The proposed project would not change the uses on site, and impacts would be less than significant.

3.12 MINERAL RESOURCES

Would the project:

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

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a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

No Impact. There are four mineral resources zones (MRZ):

- **MRZ-1.** Adequate information indicates that no significant mineral deposits are present or likely to be present.
- **MRZ-2.** Adequate information indicates that significant mineral deposits are present or there is a high likelihood for their presence, and development should be controlled.
- **MRZ-3.** The significance of mineral deposits cannot be determined from the available data.
- **MRZ-4.** There is insufficient data to assign any other MRZ designation.

The project site is in MRZ-3, where the known or inferred mineral occurrences of undetermined mineral resource significance exists (CGS 2017). The project site and its surroundings areas are not developed for mineral extractions. The areas surrounding the project site are developed with buildings, and therefore, no loss of known resources would result from project implementation. No impact would occur.

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

No Impact. The City of San Diego Conservation Element indicates that extraction of mineral resources occurs in Mission Valley, and other areas such as Carroll Canyon and Mission Gorge, as well as within the Multiple Species Conservation Program subarea plan (San Diego 2008b). The project site currently operates as a school and no mining activities occur onsite. Therefore, the proposed project would not result in a loss of availability of a mining site, and no impact would occur.

3.13 NOISE

Environmental Setting

Existing Noise Environment

The proposed project is located between the Torrey Pines Extension State Park and residential uses. The closest residential uses are single-family homes north and east of the site. The state park is adjacent to the school property to the south and west. The Gully Trailhead access point is south at the end of the Mira Montana Drive cul-de-sac and the Gully Trail runs along the southern property line of the school before heading north.

Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. These uses include residences, schools, hospital facilities, houses of worship, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. Sensitive receptors surrounding the proposed

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reconstruction of Del Mar Heights are single-family homes to the north and east and the Torrey Pines Extension State Park and trails to the south and west.

Applicable Standards

State Noise Regulations

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a general plan that includes a noise element which is to be prepared according to guidelines adopted by the Governor's Office of Planning and Research. The purpose of the noise element is to "limit the exposure of the community to excessive noise levels."

The California Green Building Standards Code (CALGreen) has requirements for insulation that affect exterior-interior noise transmission for nonresidential structures. Pursuant to CALGreen Section 5.507.4.1, Exterior Noise Transmission, an architectural acoustics study may be required when a project site is within a 65 dBA CNEL or L_{dn} noise contour of an airport, freeway or expressway, railroad, industrial source or fixed-guideway source. Where noise contours are not readily available, if buildings are exposed to a noise level of 65 dBA L_{eq} during any hour of operation, specific wall and ceiling assembly and sound-rated windows may be necessary to reduce interior noise to acceptable levels.

City of San Diego Noise Regulations

The City of San Diego Municipal Code includes noise standards in Chapter 5, Article 9.5, *Noise Abatement and Control*. This section provides noise regulations from the municipal code that are applicable to the proposed project. Table 6 summarizes the exterior noise limits from the municipal code.

Table 6 City of San Diego Exterior Sound Level Limits

Land Use	Time of Day	Sound Level, $L_{eq}(1hr)$ dB
Single-Family Residential	7:00 AM to 7:00 PM	50
	7:00 PM to 10:00 PM	45
	10:00 PM to 7:00 AM	40
Multi-Family Residential	7:00 AM to 7:00 PM	55
	7:00 PM to 10:00 PM	50
	10:00 PM to 7:00 AM	45
All Other Residential	7:00 AM to 7:00 PM	60
	7:00 PM to 10:00 PM	55
	10:00 PM to 7:00 AM	50

Source: San Diego Municipal Code Chapter 5, Article 9.5, *Noise Abatement and Control*.

Per Section 59.5.0404 of the Municipal Code, construction activities are limited to the hours of 7:00 AM to 7:00 PM Monday through Saturday and are prohibited on legal holidays (except Columbus Day and Washington's Birthday) and Sundays. Construction noise is limited to an average of 75 dBA L_{eq} at or beyond a residential property line between 7:00 AM and 7:00 PM.

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The City of San Diego does not establish vibration thresholds, therefore, for the purposes of this analysis the FTA threshold of 0.2 inches/second (in/sec) peak particle velocity (PPV) will be used to assess vibration impacts at non-engineered structures (e.g., wood-frame residential) (FTA 2018).

San Diego California Environmental Quality Act Significance Determination Thresholds

The City of San Diego provides noise thresholds in Chapter K, *Noise*, of its *CEQA Significance Determination Thresholds* guidance document for determining significant impacts. Where applicable, these recommended criteria are adopted as significance thresholds in this analysis. The noise analysis is included in Appendix G to this Initial Study.

Would the project result in:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?		X		
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Less Than Significant Impact.

Construction Noise

The total duration for project construction is anticipated to be approximately 14 months. Construction equipment for the proposed project would include equipment such as concrete saws, excavators, dozers, tractors, loaders, graders, cranes, lifts, rollers, pavers, and air compressors.

Two types of short-term noise impacts could occur during construction: (1) mobile-source noise from transport of workers, material deliveries, and debris and soil haul and (2) stationary-source noise from use of construction equipment.

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Construction Vehicles

The transport of workers and materials to and from the construction site would incrementally increase noise levels along site access roadways. Individual construction vehicle pass-bys including haul trucks may create momentary noise levels of up to approximately 85 dBA L_{\max} at 50 feet. However, these occurrences would generally be infrequent and short-lived.

Worker and vendor trips would total a maximum of 283 daily trips⁶ during the overlapping activity phases of building construction, paving, and architectural coating. For comparison, student enrollment at Del Mar Heights for the 2018 - 2019 academic year was 495. The student trips would be eliminated during the time of construction and worker and vendor trips would be less than existing trips associated with students. Therefore, construction-related trip noise would result in a less-than-significant impact.

Construction Equipment

Noise generated by onsite construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each stage of construction involves different kinds of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

The noise produced at each activity phase is determined by combining the L_{eq} contributions from each piece of equipment used at a given time, while accounting for the ongoing time-variations of noise emissions. Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on the specific activity performed at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and shielding effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements. Noise levels from project-related construction activities were calculated from the simultaneous use of all applicable construction equipment at spatially averaged distances (i.e., from the acoustical center of the general construction site) to the property line of the nearest residences and state park and trails. Although construction may occur across the entire phase area, the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors.

The expected construction equipment mix was categorized by construction activity using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). The associated, aggregate sound levels—grouped by construction activity—are summarized in Table 7. RCNM modeling input and output worksheets are included in Appendix G.

⁶ Based on information provided by Del Mar School District and the project air quality modeling.

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Table 7 Project-Related Construction Noise dBA L_{eq}

Construction Activity Phase	Single-Family Homes	Torrey Pines Extension State Park & Trail
	330 feet - east	350 feet - south
Demolition & Haul	70	70
Site Preparation	70	70
Grading	70	70
Utility Trenching	60	60
Building Construction	69	69
Paving	70	70
Architectural Coating	57	57

Notes: Calculations performed with the FHWA RCNM software are included in Appendix G.
Decibels rounded up to the nearest whole number.
Distances measured from the acoustical center of the construction site.

Both San Diego's Municipal Code and *CEQA Significance Determination Thresholds* guidance document apply a 75 dBA L_{eq} exterior noise limit to residential and other sensitive uses affected by construction noise. Although it does not directly indicate open recreational uses, such as state parks, the City of San Diego's *Significance Determination Thresholds* states, "where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors, such as day care facilities, a significant impact may be identified." For the purposes of this analysis, the threshold is applied to all categories of sensitive receptors, including the Torrey Pines Extension trails.

Residential Receptors

As shown in Table 7, on average noise levels would not exceed 75 dBA L_{eq} at the nearest residential property line. Construction is proposed to take place during the municipal code allowable hours of 7:00 AM to 7:00 PM, Monday through Saturday. This would result in a less-than-significant impact to the surrounding residential receptors.

Torrey Pines Extension State Park

The state park is adjacent to Del Mar Heights school property to the west and south. Average construction noise could reach up to 70 dBA L_{eq} at the Gully Trail, which abuts school property to the south. Noise levels on the trail would attenuate at further distances from the school. Construction noise levels are not anticipated to exceed 75 dBA L_{eq} at Torrey Pines Extension State Park and boarding trails. Therefore, this would be a less-than-significant impact.

Interim Portable Classrooms

Students would be temporarily relocated to two interim schools, Del Mar Hills Academy and Ocean Air School. The interim schools would not have enough capacity to for Del Mar Heights students at the existing buildings. To accommodate all Del Mar Heights students, four portable classrooms would be added to Del Mar Hills Academy and one portable classroom would be added to Ocean Air School. Construction noise from portable installation would be temporary and minimal equipment would be used. Installation and transport of portables could result in 16 truck trips at Del Mar Hills Academy and 4 truck trips at Ocean Air School. Portable installation and related trips would occur during the allowable hours of 7:00 AM to 7:00 PM, Monday through

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Saturday. As stated above in *Applicable Standards*, construction is prohibited on Sundays and any legal holiday except for Columbus Day and Washington's Birthday. This would be a less-than-significant impact.

Temporary Traffic Noise Increase

Students at Del Mar Heights would be temporarily relocated for approximately 14 months to Ocean Air Elementary and Del Mar Hills Academy. Enrollment during the 2019 to 2020 academic year at Del Mar Heights is 459 students (enrollment is projected to be 440 students for the 2020-2021 academic year). Out of those 459 students, approximately 203 would be relocated to Ocean Air Elementary and 236 would be relocated to Del Mar Hills Academy. The relocation of students would temporarily generate new trips in the vicinity of the interim schools. The district will provide bussing for students relocated to Ocean Air Elementary. Bussing will not be provided to Del Mar Hills Academy, which shares the same attendance area as Del Mar Heights.

For reference, the roadway segment leading up to Del Mar Hills Academy (Mango Dr. - Lozana Rd. to Del Mar Heights Rd.) has an existing average daily traffic (ADT) volume of 7,700.⁷ The San Diego Municipal Code uses a trip generation rate of 2.9 trips per student.⁸ Applying this trip generation rate to the 236 students relocated from Del Mar Heights to Del Mar Hills Academy results in 685 additional trips. When compared to the existing ADT, this would result in a temporary traffic noise increase of 0.5 dBA CNEL or less. As discussed in San Diego's *CEQA Significance Determination Thresholds* guidance document, traffic noise increases of less than 3 dBA are not considered significant.

Ocean Air Elementary is anticipated to accommodate an additional 203 students during the proposed project construction. Busses typically transport between 60 to 71 students per bus.⁹ Using 60 students per bus conservatively, this would result in up to 4 total busses needed for student transport. The addition of 4 busses in the vicinity of the school would result in a less-than-significant temporary noise increase.

Operational Noise

Traffic Noise

The proposed project would not result in staff or student population increases. The proposed project would reduce the number of classrooms from 22 existing to 21 proposed. Currently, the school has one parking lot and entrance on the north via Boquita Drive. The proposed project would expand the parking lot and add a drop-off/pick-up lane along the east and southeast portion of the school. The new drop-off/pick-up lane would be parallel to Mira Montana Drive and would range approximately between 10 feet to 25 feet below Mira Montana Drive. The elevation range, of 10 feet to 25 feet, of the slope would act as a noise barrier to car idling and other vehicle related noises by obstructing line-of-sight to residences on Mira Montana Drive. The new drop-off/pick-up lane would deter vehicles from using Mira Montana as a drop off area. Traffic noise would not significantly increase above existing conditions and impacts would be less than significant.

⁷ SANDAG. 2009-2013 Average Traffic Volumes, City of San Diego.

⁸ San Diego Municipal Code, Land Development Code trip generation of 2.9 trips/student for elementary schools.

⁹ CDE, NHSTA's Unedited Summary of School Bus Report. <https://www.cde.ca.gov/ls/tt/or/nhtsa3702.asp>

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Mechanical Equipment

The construction of new buildings would have mechanical HVAC systems. HVAC equipment would be new, and it is anticipated that the associated noise would be similar to existing HVAC equipment or quieter. For reference, typical HVAC noise is 72 dBA at 3 feet and the nearest sensitive receptors are residences approximately 150 feet to the east and north of proposed buildings. At that distance, HVAC noise levels would attenuate to 38 dBA or less. This would not exceed the municipal code exterior noise limits for single-family residences at any time of day or night as shown in Table 6 (e.g., 40 dBA nighttime). This impact would be less than significant.

Recreational Noise

The project includes the following:

- A new outdoor learning area on the northwest corner where the existing kindergarten and playground currently are located;
- Reconfiguration of the existing multi-use field on the western portion of the site;
- Elimination of the existing batting cages/baseball diamonds on the fields on the southern portion of the site to accommodate new additional learning spaces (field space).

These additions, reconfigurations, and eliminations could change the existing noise environment during outdoor student recreation activities. The new outdoor learning area on the northwest corner would not cause a significant noise increase or change in use from its existing kindergarten playground. The outdoor learning area would not have nighttime lighting and use would be limited to daylight hours. The southeast portion of the multi-use field that includes two ball fields and batting cages located on the south and southeast corner of the school would be eliminated and replaced by new educational buildings reducing recreational noise at nearby residences to the south and east off Mira Montana Drive. The multi-use field adjacent to Torrey Pines Extension would be reconfigured, causing no substantial change to the associated recreational noise. The proposed project's outdoor learning area and playfields plan would not result in a substantial noise increase from existing conditions and would, instead, result in a potential noise decrease in certain areas. Therefore, recreational noise would be less than significant.

Noise and Land Use Compatibility

The proposed project land use would not change and would remain a school use surrounded by residential uses and open space. The project would not generate new or additional trips. The land use compatibility of the noise environment at the proposed project site would remain acceptable.

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

Less Than Significant Impact With Mitigation Incorporated.

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Operational Vibration

The operation of the proposed project would not include any substantial long-term vibration sources. Thus, no significant vibration effects from operations sources would occur.

Construction Vibration

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight architectural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

For reference, a vibration level of 0.2 inches per second (in/sec) peak particle velocity (PPV) is used as the limit for non-engineered timber and masonry buildings (which would apply to the surrounding residential structures) (FTA 2018). Table 8 summarizes vibration levels for typical construction equipment at a reference distance of 25 feet and at the nearest sensitive receptors.

Table 8 Vibration Levels for Typical Construction Equipment

Equipment	PPV (in/sec) at 25 feet	PPV (in/sec) at 15 feet
Vibratory Roller	0.21	0.45
Static Roller	0.05	0.11
Large Bulldozer	0.089	0.19
Loaded Trucks	0.079	0.16
Jackhammer	0.035	0.075
Small Bulldozer	0.003	0.006

Sources: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018. New Zealand Transport Agency 2012.

As shown in Table 8, typical construction equipment can generate vibration levels up to 0.21 in/sec PPV at 25 feet. Paving and grading activities could potentially occur at a distance of 15 feet from residential structures to the north during the proposed parking lot expansion. These activities could include construction equipment such as vibratory rollers. Table 8 shows that vibration levels could exceed 0.2 in/sec PPV at 15 feet with use of a vibratory roller, resulting in a potentially significant impact. Implementation of Mitigation Measure N-1 would reduce project-related construction vibration to a level less than significant. Specifically, use of a static roller is predicted to generate vibration levels of approximately 0.11 in/sec PPV at a distance of 15 feet, which would not exceed the 0.2 in/sec PPV threshold.

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Mitigation Measures

N-1 If paving activity during construction is required within 25 feet of nearby residential structures, use of a static roller in lieu of a vibratory roller shall be employed.

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

No Impact.

The proposed project is not located within the Airport Environs Overlay Zone (AEOZ) of the San Diego International Airport. The McClellan-Palomar Airport is approximately 12 miles to the north in the Carlsbad, CA and the nearest private and or military air strip is Miramar MCAS (Joe Foss Field) Airport, approximately 7 miles to the southeast. The project would not expose people working in the project area to excessive aircraft noise levels. There would be no impact.

3.14 POPULATION AND HOUSING

Would the project:

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

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

No Impact. The proposed project would not increase the capacity of Del Mar Heights School, however, the number of classrooms onsite would decrease by one. Therefore, the proposed project would not directly increase population growth in the area. No construction of homes or businesses is proposed, not extension of roads or other infrastructure. Project implementation would not induce population growth and not impact would occur.

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

No Impact. Project construction would be restricted to the existing Del Mar Heights School campus, and no housing would be displaced or replaced. No impact would occur.

3.15 PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?			X	
Police protection?			X	
Schools?				X
Parks?			X	
Other public facilities?				X

- a) Fire protection?

Less Than Significant Impact. The closest fire station to the project site is the San Diego Fire Department Station 24, located on 13077 Hartfield Avenue, in the City of San Diego, approximately 1.30-miles northeast of the project site and provides fire protection and emergency medical services to Del Mar Heights, including the project site. Table 9, *Response Times to Project Site*, provides a list of fire equipment/fire stations and the amount of time it would take to reach the project site.

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Table 9 Response Times to Project Site

Fire Station and Equipment	Response Times
Engine	
E24 – Fire Station 24 at 13077 Hartfield Avenue	24.8 minutes
SOLE – Solana Beach Fire Station 1 at 101 North Nardo Avenue	7.9 minutes
E47 – Fire Station 47 at 6041 Edgewood Bend Court	8.5 minutes
E41 – Fire Station 41 at 4914 Carrol Canyon Road	9.2 minutes
Truck	
SOLT – Solana Beach Fire Station 1 at North Nardo Avenue	7.9 minutes
T35 – Fire Station 35 at 4285 Eastgate Mall	10.1 minutes
Battalion Chief	
B5 – Fire Station 35 at 4285 Eastgate Mall	10.1 minutes
B3 – Fire Station 25 at 1972 Chicago Street	17.9 minutes
Source: Trame 2019	

Although the proposed project would increase building square footage by approximately 18,000 square feet, the student capacity of the proposed project would remain unchanged, and the site would continue to operate as a school. Additionally, the improvement of the onsite parking and queuing would remove congestion in the adjacent neighborhood, and the addition of fire lanes around the site would thereby improve emergency vehicle access. Therefore, project implementation would not substantially affect the Department's response times or require expansion of fire protection services such that new or physically altered fire stations would be required. Impacts would be less than significant.

b) Police protection?

Less Than Significant Impact. Law enforcement and police protection services are provided by the San Diego Police Department – Northwestern Division at 12592 El Camino Real, in the City of San Diego, approximately 0.66-mile east of the site, which serves the Del Mar Heights area. Although the proposed project would increase building square footage by approximately 18,000 square feet, the student capacity of the proposed project would remain unchanged, and the site would continue to operate as a school. Furthermore, the improved parking onsite and queuing would remove congestion in the adjacent neighborhood, thereby reducing response times to the site. Therefore, project implementation would not warrant additional law enforcement facilities. Impacts to police protection services would be less than significant.

c) Schools?

No Impact. School service needs are related to the size of a residential population, geographic area served, and community characteristics. The proposed project would address the most critical physical needs of buildings and grounds at the campus through the rebuilding and reconfiguration of buildings onsite. Once

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constructed, the new school facilities would continue to serve the existing Del Mar Heights School program and students in the District attendance area. No negative impact on school facilities or services would occur.

d) Parks?

Less than Significant Impact. The proposed project would not generate a demand for park space, which is typically caused by population and/or employment growth. The proposed project would improve the Del Mar Heights School's recreational facilities that are available for community use. The proposed project would provide amenities that are not now available in the community, such as an outdoor learning space in the northwest portion of the site, an open grass amphitheater area for larger group gatherings, a Canyon Rim path and sidewalk which would create a walking loop around the site, stair and ramp access to the trail head at the southern portion of the site which serves as a workout opportunity, and a smaller grass field area at the northwestern portion of the site for mid-sized games. Although the square footage of useable recreation space would decrease by 41,643 square feet, the enhanced recreational facilities and the increased use by students and the community would compensate for the reduction. No significant impact would occur. Additionally, the reconfiguration of the site would improve student safety by separating public and school uses.

e) Other public facilities?

No Impact. The need for public services and facilities (e.g. libraries, hospitals, childcare, teen or senior centers) is typically caused by an existing school, it would not result in the need for new or expanded public facilities. No impact would occur to public facilities.

3.16 RECREATION

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

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact. Similar to existing conditions, operation of Del Mar Heights School would not require students to use existing neighborhood or regional parks. The proposed project would enhance and update the school's outdoor recreational spaces. While the ballfield used by the older little league teams (90-

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base paths) would be eliminated, the new flat grass field includes space for two smaller fields used by younger baseball teams. The activity level would be similar on the new fields as the existing, but a shift in use among age groups would occur. The field is also available for soccer play.

Additionally, an outdoor learning area would be created onsite, which would be used by both the school and the community. The student capacity would remain unchanged after project implementation and impacts to offsite recreational facilities as a result of the proposed project would not result in negative impacts.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less Than Significant Impact. As discussed in section 3.16(a), the proposed project would not require construction of offsite recreational facilities. The proposed project includes the rebuilding and enhancing of recreational facilities at Del Mar Heights School. The environmental effects related to the whole project, including the recreational facility improvements and additions, are discussed throughout this Initial Study. Impacts would be less than significant.

3.17 TRANSPORTATION

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?				X
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?				X

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

Less Than Significant Impact.

Impact to Roadway Facilities

Roadways in the project vicinity include Boquita Drive and Cordero Road.

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Boquita Drive is a 2-lane road with a speed limit of 25 miles per hour and allows curbside parking on both sides of the roadway without restrictions. In the study area the intersections along the street are stop-controlled. At the Cordero Road and Boquita Drive intersection there are four school yellow pedestrian crossings.

Cordero Road is a 2-lane road with a speed limit of 25 miles per hour and allows curbside parking on both sides of the roadway without restrictions. In the study area the intersections along the street are stop-controlled.

Existing Traffic Conditions

Existing access to the school is through the driveway on Boquita Drive, which also leads to the school parking lot. The parking lot contains 48 spaces and an approximately 317-foot student loading area adjacent to the administration building, which can accommodate 15 cars. Currently, staff and parents park their cars along the neighborhood streets, which further narrows the two-lane neighborhood street, and queuing occurs on Boquita Drive during drop-off/pick-up times, causing traffic impacts on the surrounding roadways. The long traffic queue backs up to the 4-way stop Boquita Drive/Cordero Road intersection, which makes pedestrian crossing difficult, despite the presence of a crossing guard. Additionally, the afternoon queue of cars waiting to pick students causes other drivers to drive on the wrong side of the road to access the parking lot. Due to the parked cars and the queue of cars in both lanes, riding bikes to school is challenging and the narrow sidewalks do not provide enough space for safe riding. Similarly, the parked cars during afternoon pick-up hinder residents from entering/exiting their driveways. Moreover, the parked cars on both sides of the street limit the ability of mail and trash trucks to access residences which further congests the street.

During afternoon pick-up, some parents leave their cars in the travel lane to retrieve their child, and some parents complete an illegal and hazardous U-turn on Boquita Drive to avoid the time required to flow through the on-site loop. The congestion on Boquita Drive causes a large number of parents to direct their children to walk to the canyon via Mira Montana Drive, which creates safety concerns.

Long Term Operations Project Traffic

The proposed project would not increase the student capacity at Del Mar Heights School. Therefore, there would be no additional traffic as a result of the project. Additionally, there would be no change in traffic patterns as the entrance to the extended student loading zone would remain via Boquita Drive.

The Del Mar Heights School parking lot and traffic flow would be improved through the expansion of the parking lot and student loading zone, which would allow for an improved and expanded off-street student drop-off and pick-up area. At the southeastern portion of the project site, a drop-off/pick up zone would be centrally located, and a turnaround would allow vehicles to exit from the access driveway on Boquita Drive. The student loading zone would also extend from the access driveway to the proposed drop-off/pick-up zone, which would accommodate approximately 41 cars. With the extended queuing zone and student drop-off/pick-up area, the proposed project would improve circulation in the area, by reducing the number of vehicles on the adjacent roadways. This would create a safer environment for students who live in the neighborhood to walk and/or bike to campus. Furthermore, the construction of the ADA-compliant ramp and stairs at the southeastern portion of the site would provide students safer access to the school, as currently, students are accessing this portion of the site must do so via a dirt path. Providing a safer path would encourage students residing nearby to walk to school.

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The parking lot onsite would be expanded to include a total of 80 staff, visitor, and kindergarten parking spaces which would result in a net increase of 32 stalls, compared to existing conditions.

In summary, the additional parking spaces to be provide on-site and the added on-site queuing would improve traffic conditions on public streets in the residential areas north of the school. As a result, the project would improve traffic conditions in the area and would not result in a conflict with a program, plan, ordinance or policy addressing the roadway facilities and impacts would be less than significant.

Impact to Alternate Modes of Transportation Facilities

As shown in Figure 7, *Site Plan*, pedestrian access to the project site would be via the existing sidewalks and internal walkways that would connect to the new student loading zone. Under the proposed project, the existing access driveway would remain the same and no closure to public sidewalk would be required. The construction of the ADA-compliant ramp and stairs at the southeastern portion of the site would provide students safer access to the school, as currently, students are accessing this portion of the site must do so via a dirt path.

Additionally, there is no bicycle lane or facility along Boquita Drive and there are none within proximity of the project site. The closest bicycle lane is on Del Mar Heights Road. Project implementation would remain within the current fence line of the project site. Therefore, no impact to bicycle facilities are anticipated.

North County Transit Agency (NCTD) operates public transit bus routes in the City of Del Mar. Route 101 is the closest route to the project site; buses along this route travel north-south along South Camino Del Mar. The closest bus stop for this route is approximately 0.6 mile west of the project site at the South Camino Del Mar and Del Mar Heights Road intersection. The project would not displace any existing or future bus stop or degrade transit service in the area.

Therefore, the proposed project would not result in a conflict with a program, plan, ordinance or policy addressing the alternate mode of transportation facilities. Impacts would be less than significant, and no mitigation measures are necessary.

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

No Impact. On September 27, 2013, SB 743 was signed into law. SB 743 started a process that could fundamentally change transportation impact analysis as part of CEQA compliance. These changes include the elimination of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts in many parts of California (if not statewide). As part of the updated CEQA Guidelines, the new criteria “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (Public Resources Code Section 21099(b)(1)). On January 20, 2016, OPR released revisions to its proposed CEQA guidelines for the implementation of SB743. Final review and rulemaking for the new guidelines were completed in December 28, 2018 when the California Natural Resource Agency certified and adopted the CEQA Guidelines update package, including guidelines section implementing Senate Bill 743. OPR allows agencies an opt-in period to adopt the guidelines; they become mandatory on July 1, 2020. Vehicle miles traveled (VMT) is an indicator of the travel levels on the roadway system by motor vehicles. It corresponds to the number of vehicles multiplied by the distance traveled in a given period over a geographical area. In other words, VMT is a function of (1)

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number of daily trips and (2) the average trip length ($\text{VMT} = \text{daily trips} \times \text{average trip length}$). The City of San Diego has not implemented VMT metrics yet and currently uses the established LOS criteria. However, per SB 743 traffic congestion using a LOS metric may no longer be considered a significant impact.

As discussed in response a), the project would not result in additional student capacity and number of staff, and therefore would not result in increased trips. In addition, the project would improve the flow of traffic within and near the campus, reduce congestion and vehicle idling, and create a safer environment for students to walk and bike to school.

The K-3rd grade students temporarily transferred to Del Mar Heights Elementary School reside in the same neighborhood and as a result, VMT is not expected to increase. The busing of 4th-6th grade students to Ocean Air Elementary School would minimize the number of parents driving to Ocean Air. These student transfers are temporary and with the permanent operational improvements of the project, no impact would occur, and no mitigation measures are necessary.

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

No Impact. The main student drop-off and pick-up area would continue to be located off Boquita Drive (see Figure 7, *Site Plan*). Furthermore, the proposed project would create a drop-off and pick-up zone centrally located at the eastern parking lot, and a turnaround at the southeastern portion of the site and extend the student loading zone from the entrance of the driveway to the southeastern portion of the site, which would likely reduce curbside drop-off and reduce queues on streets. By increasing efficiency and flow for vehicles to enter and exit the school property, congestion on adjacent streets would be reduced, thereby creating a safer environment for students to walk and/or bike to campus. Additionally, the ADA-compliant ramp and stairs at the southeastern portion of the site would create a safer route for students to enter and exit the site, as students are now following a dirt path at this location. The proposed project would improve circulation and pedestrian safety for the school and would not include incompatible uses such as farm equipment on area roadways.

The design of the proposed internal drive aisles, access driveways, and other circulation improvements would be required to adhere to the requirements of the Division of the State Architect' and City of San Diego Fire Department'. For example, at intersections and project driveways, a substantially clear line of sight must be maintained between the driver of a vehicle waiting at the crossroad and the driver of an approaching vehicle. Sight distance is the continuous length of roadway visible to the driver. Since the access driveway would not change, enough sight distance would be provided and there are no restrictions blocking the view from proposed location of the access driveways and traffic on Boquita Drive. Compliance with these established design standards would ensure that hazards due to design features would not occur and that the placement of the circulation improvements would not create a conflict for motorists, pedestrians, or bicyclists traveling within or around the project site.

Therefore, no impact resulting from hazards due to design features or incompatible uses would occur and no mitigation measures are necessary.

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Traffic Conditions During Student Transfer

During the 14 months of construction at Del Mar Heights Elementary School, K-3rd grade students would be transferred to Del Mar Hills Academy and 4th-6th grade students would be transferred to Ocean Air Elementary School. The following reviews traffic conditions at the two receiving schools during this period.

The proposed plan is to relocate 236 K-3 students to Del Mar Hills Academy and to relocate 203 students in grades 4-6 to Ocean Air School. Because of the proximity of Del Mar Hills Academy to Del Mar Heights School, the transportation mode for the K-3 students would be essentially unchanged; i.e., the students would either walk or be driven to the school. However, since Ocean Air School is not in the same neighborhood as Del Mar Heights School and Del Mar Hills Academy, the District would provide buses to minimize the number of students driven to Ocean Air School.

The plan is for the buses to stage for loading and unloading at Del Mar Hills Academy for the trip to Ocean Air School. To minimize traffic congestion, the buses would leave Del Mar Hills Academy 20 to 30 minutes prior to the beginning of the school day and would arrive back at Del Mar Hills Academy 20 to 30 minutes after the end of the school day. Parents would also have the option of driving the students to Ocean Air School, which would be more convenient for many of the students and parents. A conservative approach on the number of parents choosing to drive their students to Ocean Air and in the trip rates applied has been taken to ensure that worst-case conditions are evaluated.

Methodology

An analysis has been conducted to evaluate the traffic impacts of the relocated students and the modified traffic patterns. The objective of the analysis is to quantify the impacts of the additional traffic on the streets and intersections in the vicinity of each school site and determine whether the project would increase hazards.

The methodology for the traffic study, in general, was to 1) establish the existing baseline traffic conditions, 2) estimate the levels of additional traffic that would be generated by the elevated student levels at each school, and 3) conduct a comparative analysis of traffic conditions with and without the proposed project. In addition, the study addresses the circulation issues associated with the buses that will be used for student loading and unloading activities.

The analysis is based on the morning (AM) and afternoon (PM) peak period traffic volumes on the most-directly impacted intersections in the vicinity of each school. The LOS at the three intersections shown in Table 10 were analyzed. The table lists the intersections and shows the type of traffic control that is in place at each intersection. All intersections are under the jurisdiction of the City of San Diego.

The AM peak period for the schools would coincide with the morning commuter peak period for the overall street network while the peak traffic volumes generated by the schools in the afternoon would occur earlier than the PM commuter peak period.

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Table 10 Study Area Intersections

Intersection	Type of Traffic Control
At Del Mar Hills Academy	
Del Mar Heights Road at Mango Drive	Traffic Signal
Mango Drive at Lozana Road/School Driveway	4-Way Stop Signs
At Ocean Air School	
Carmel Mountain Road at Canter Heights Drive	Traffic Signal

The roadway network in the project vicinity, the existing traffic volumes, and the levels of service (LOS) at the affected study area intersections are described below.

Roadway Network

The streets and roads within the study area that provide access to the two school sites include Mango Drive, Lozana Road, and Del Mar Heights Road (for Del Mar Hills Academy) and Canter Heights Drive and Carmel Mountain Road (for Ocean Air Elementary School). The following paragraphs provide a brief description of the characteristics of these roadways. Figure 12 shows the study area roadway network, including the type of traffic control at the intersections, the lane configuration at the intersections, the speed limit on each street segment, and the number of lanes on each street segment.

Mango Drive is a two lane north-south street that abuts the west side of the Del Mar Hills Academy campus. It is a local street that serves as the primary access route between Del Mar Heights Road and the school site. The speed limit on Mango Drive is 25 miles per hour (mph) north of Del Mar Heights Road and 30 mph south of Del Mar Heights Road.

Lozana Road is a two-lane east-west street that intersects with Mango Drive at the entrance to Del Mar Hills Academy. The school driveway is essentially an easterly continuation of Lozana Road. The speed limit on Lozana Road is 25 mph.

Del Mar Heights Road is a four-lane east-west highway located approximately one-quarter mile south of the Del Mar Hills Academy campus. It is an arterial route that has an interchange with the San Diego Freeway (Interstate 5) about 1,000 feet east of Mango Drive. The speed limit on Del Mar Heights Road is 45 mph.

Canter Heights Drive is a two lane north-south street that terminates at the Ocean Air Elementary School campus. It is a local street that serves as the primary access route between Carmel Mountain Road and the school site. The speed limit on Canter Heights Drive is 25 mph.

Carmel Mountain Road is a four-lane east-west highway located approximately one-half mile south of the Ocean Air Elementary school campus. It is an arterial route that has an interchange with the San Diego Freeway (Interstate 5) about 1½ mile west of Canter Heights Drive. The speed limit on Carmel Mountain Road is 45 mph.

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In addition to the streets listed above and shown on Figure 12, there are other local streets in the vicinity of the schools that might be used as access routes; i.e., Vantage Way, Durango Drive, Recuerdo Drive, Mercado Drive, and Boquita Drive in the residential area west of Del Mar Hills Academy. These are two lane local streets that could potentially be used as minor access routes to and from the school.

Existing Traffic Volumes

Manual traffic counts were taken at the three study area intersections in February 2020 during the morning and afternoon peak periods. The morning counts were taken from 7:00 to 9:00 a.m. and the afternoon counts were taken from 2:00 to 3:30 p.m. The peak hour traffic volumes that were used for the analysis represent the highest one-hour interval of traffic flow within these two monitoring periods. Figure 13 shows the existing peak hour traffic volumes and turning movements at each intersection for the AM and PM peak hours. The observed traffic volumes were rounded to the nearest 10.

Traffic impact analyses typically address a project's impacts on existing traffic conditions as well the traffic conditions for a future target year. As this project would be initiated in 2020, as the traffic volumes for the analysis were collected in 2020, and as the project would have a duration of approximately one year, an analysis of future traffic conditions is not required.

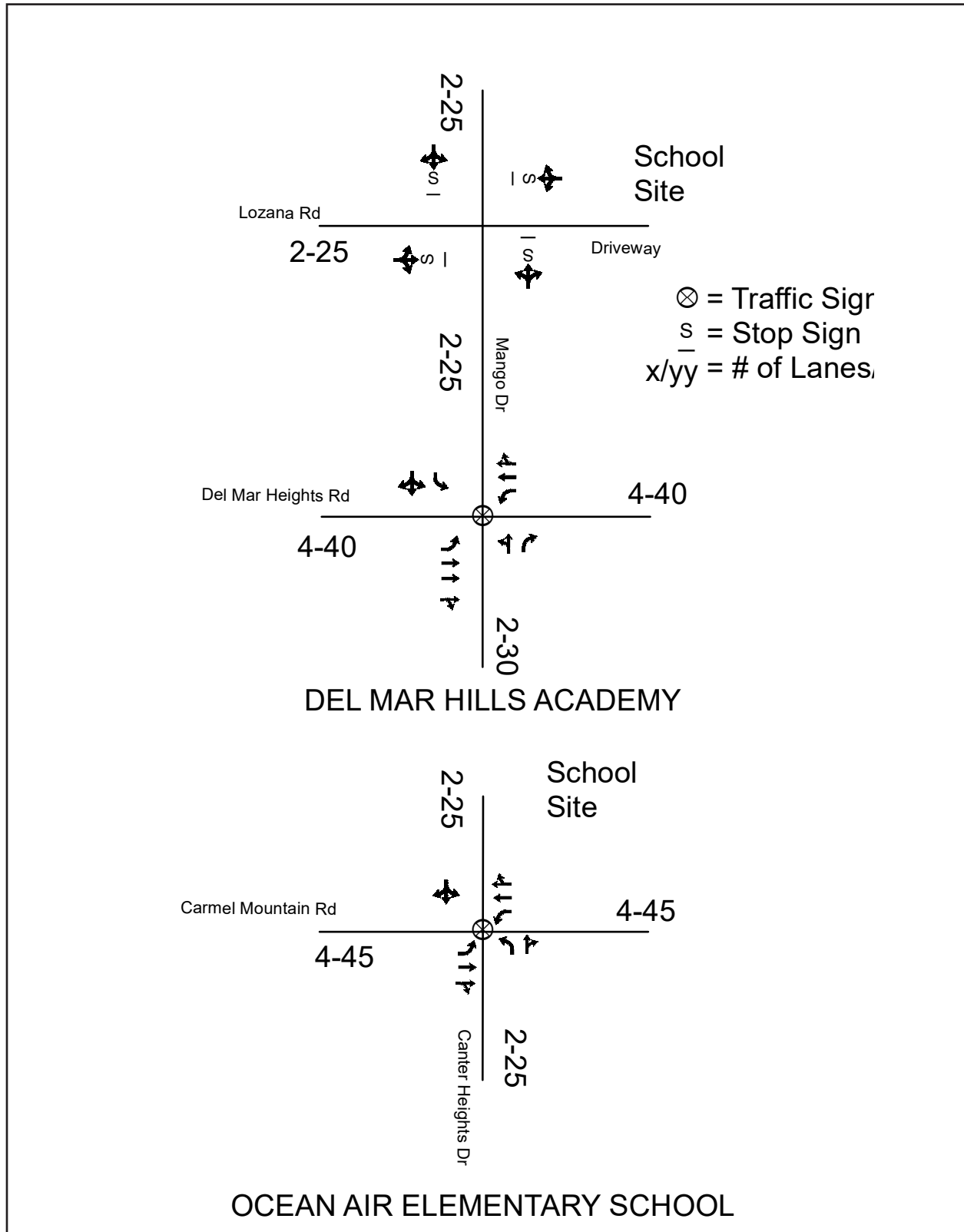
Intersection Levels of Service

To quantify the existing baseline traffic conditions, the study area intersections were analyzed to determine their operating conditions during the AM and PM peak hours. The traffic conditions were quantified by calculating the levels of service at each intersection. Level of service (LOS) is an industry standard by which the operating conditions of a roadway segment or an intersection are measured.

LOS is defined on a scale of A through F with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. LOS A is characterized as having free flowing traffic conditions with minimal vehicle delay and no restrictions on maneuvering or operating speeds, where traffic volumes are low and travel speeds are high. LOS F is characterized as having forced flow with many stoppages, high levels of delay, and low operating speeds.

According to City of San Diego standards, LOS A through D represents acceptable conditions, while LOS E and F represent congested, over-capacity conditions. The levels of service at the study area intersections were determined by using the Highway Capacity Manual (HCM) methodology, which is consistent with the guidelines for traffic impact studies from the City of San Diego's "Traffic Impact Study Manual."

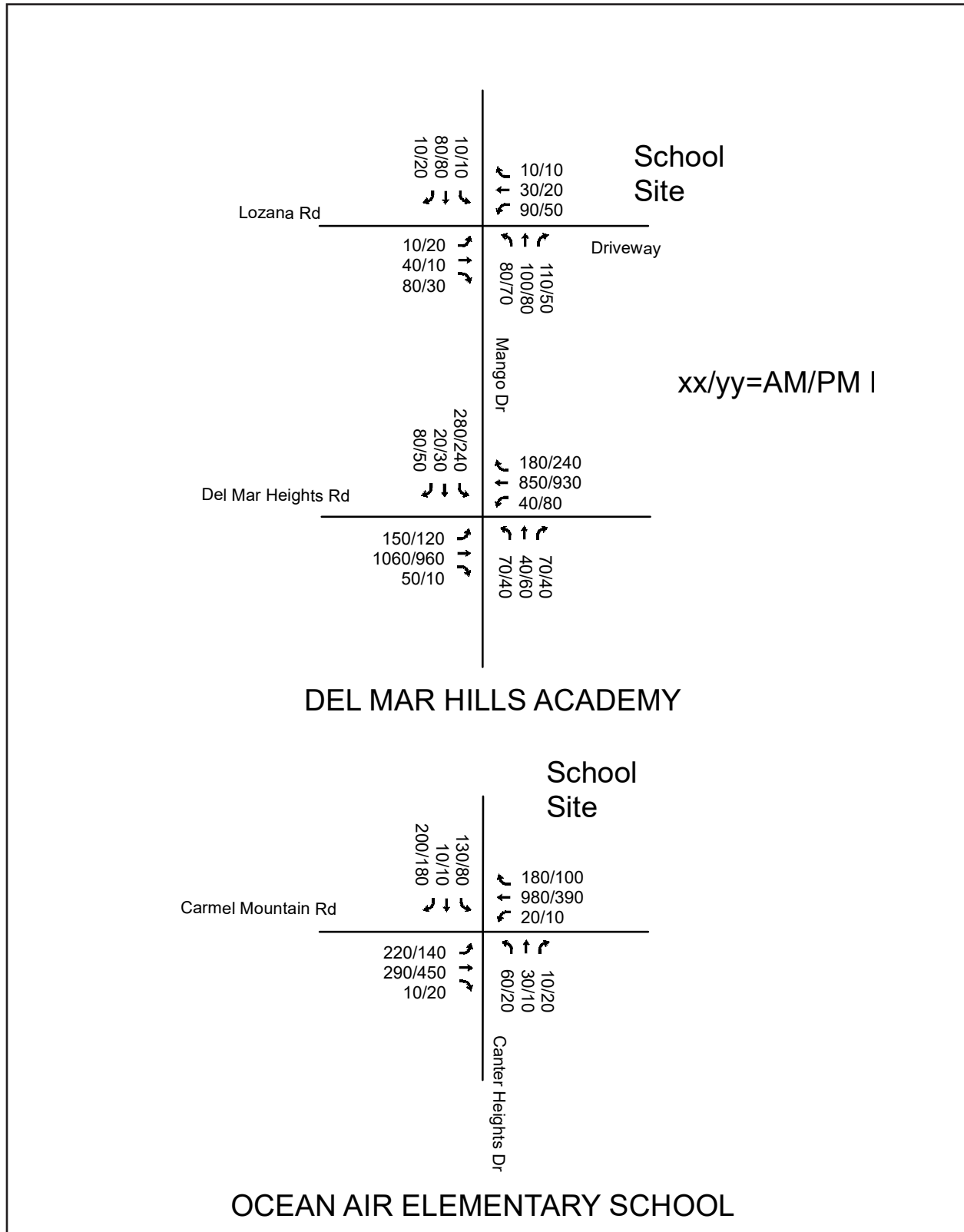
Figure 12 - Study Area Streets and Intersections
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Figure 13 - Existing Traffic Volumes
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Levels of service are based on the average amount of vehicular delay that occurs at an intersection. The average levels of vehicle delay at each intersection and the resulting levels of service were determined using the Highway Capacity Software (HCS). The relationship between delay values and the corresponding levels of service is shown in Table 11.

Table 11 Relationship Between Delay Values & Levels Of Service

Level of Service	Delay Value (seconds) Signalized Intersections	Delay Value (seconds) Unsignalized Intersections
A	0.0 to 10.0	0.0 to 10.0
B	> 10.0 to 20.0	> 10.0 to 15.0
C	> 20.0 to 35.0	> 15.0 to 25.0
D	> 35.0 to 55.0	> 25.0 to 35.0
E	> 55.0 to 80.0	> 35.0 to 50.0
F	> 80.0	> 50.0

Based on the hourly traffic volumes, the turning movement counts, and the existing number of lanes at each intersection, the average vehicle delay values and corresponding levels of service have been determined at each intersection for the existing conditions scenario, as summarized in Table 12.

Table 12 indicates that all three of the study area intersections currently operate at acceptable levels of service (LOS A through D). During the AM peak hour, one intersection operates at LOS B and two intersections operate at LOS C. During the PM peak hour, one intersection operates at LOS A, one intersection operates at LOS B, and one intersection operates at LOS C.

Table 12 Existing Intersection Levels Of Service

Intersection	Delay Value & Level of Service	
	AM Peak Hour	PM Peak Hour
At Del Mar Hills Academy		
Del Mar Heights Road at Mango Drive (signalized)	31.1 – C	29.7 – C
Mango Drive at Lozana Road (4-way stop signs)	10.1 – B	8.6 – A
At Ocean Air School		
Carmel Mountain Rd at Canter Heights Dr (signalized)	31.1 – C	16.3 – B

It should be noted that the delay and level of service values shown in Table 12 represent the average values for vehicles on all four approaches of the intersections during the entire peak hours. It is likely that motorists on some of the individual approaches and/or in specific turning lanes at the intersections would experience delays that are greater than the average values shown in the table. And it is also likely that some of the short-term periods within the peak hour would exhibit greater delays than what is shown for the peak hour average. The typical approach for a traffic analysis, particularly for purposes of CEQA documentation, is to evaluate the levels of service during the peak hour analysis periods.

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Impact Analysis

The following sections outline the impacts of the temporary student relocation on the study area traffic conditions. First is a quantification of the levels of additional traffic that would be generated by the elevated student levels at each school. This is followed by an analysis of the impacts of the proposed student relocations on traffic volumes and intersection levels of service.

The proposed relocation of students from Del Mar Heights School to Del Mar Hills Academy and Ocean Air School would result in an increase in traffic volumes on the streets that provide access to the receiving schools because an additional number of students would be transported to and from the schools by their parents or guardians and additional faculty would be driving to and from the schools. The trip generation rates and the anticipated volumes of additional traffic that would be generated at each school are shown in Table 13.

Table 13 Project Generated Traffic

Schools	AM Peak Hour			PM Peak Hour			Daily Traffic
	Total	In	Out	Total	In	Out	
Trip Generation Rates							
Elementary School (trips per student)	1.37	54%	46%	0.70	45%	55%	2.45
Generated Traffic Volumes							
Del Mar Hills Academy (236 students)	323	174	149	165	74	91	580
Ocean Air School (203 students)	278	150	128	142	64	78	500
Directly to School (55%)	153	83	70	78	35	43	280
To Del Mar Hills for bus (45%)	125	67	58	64	29	35	220
Total to Del Mar Hills	448	241	207	229	103	126	800

The trip generation rates for the schools represent values from the *Trip Generation Manual* (Institute of Transportation Engineers, 10th Edition, 2017) for the elementary school land use category. The trip rates that were used for the traffic analysis are the rates at the high end of the range of data from the manual. They are approximately double the value of the average trip generation rates for an elementary school. This assumption was used so that the worst-case scenario was evaluated. Although the trip generation rates and traffic volumes shown in the table are based on the number of students, the data represent the total number of vehicle trips generated at each school, including staff/faculty vehicles, drop-off/pick-up activities, visitors, and deliveries.

As shown in Table 13, there would be two categories of students commuting to Ocean Air School. The first category represents students who would be transported directly to the school by their parents/guardians. The second category represents students that would be transported to Del Mar Hills Academy and transferred to buses for the ride to Ocean Air School. Based on the geographical distribution of the current students' residences, it was estimated that 26 percent of the students live at locations where it would be more convenient to commute directly to Ocean Air School instead of Del Mar Hills Academy. It was also assumed that the students who live in the immediate vicinity of Del Mar Hills Academy would ride the buses to Ocean Air School because of the geographical convenience provided, which represents 16 percent of the students. For the remaining 58 percent of the students, it was assumed that half of the students would use the buses to travel

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between Del Mar Hills Academy and Ocean Air School (29 percent) and that half of the students would be driven directly to Ocean Air School (29 percent). Based on these assumptions, the overall finding is that 55 percent of the students that would be relocated to Ocean Air School would be driven directly to and from the school (26 plus 29 percent) and that 45 percent of the students would use the buses that load and unload at Del Mar Hills Academy (16 plus 29 percent).

Table 13 indicates that the student relocation program would result in an additional 448 vehicle trips during the morning peak hour (241 inbound and 207 outbound), 229 trips during the afternoon peak hour (103 inbound and 126 outbound), and 800 vehicle trips per day at Del Mar Hills Academy. These numbers represent the 236 K-3 students that would be relocated to Del Mar Hills Academy plus the grades 4-6 students that would use the buses to travel between the two schools. The table also indicates that the program would result in an additional 153 vehicle trips during the morning peak hour (83 inbound and 70 outbound), 78 trips during the afternoon peak hour (35 inbound and 43 outbound), and 280 vehicle trips per day at Ocean Air School.

It should be noted that the volumes of traffic that would be generated by the proposed school reconstruction project do not represent new traffic on the overall roadway network because the traffic volumes shown in Table 13 represent vehicles that would be re-directed to the two school sites from the existing Del Mar Heights School. The total number of students attending school in the area and the associated volumes of school-generated traffic would not change. The project's traffic impacts would, therefore, be localized impacts on the streets and intersections in the immediate vicinity of the two affected schools.

The increased volumes of traffic that would be generated by the relocated students at the two schools during the morning and afternoon peak periods were distributed onto the roadway network based on the geographical distribution of the current students' residences and the layout of the area's roadway network. Figure 14 shows the assumed geographical distribution of project generated traffic on the access roads at each school site.

Using the generated traffic volumes shown in Table 13 for the proposed school project (plus the transport buses) and the geographical distribution assumptions outlined above, the additional volumes of project-related traffic on each roadway and at each study area intersection were determined for the traffic impact analysis. The volumes of project generated traffic at each study area intersection are shown on Figure 14.

To quantify the project's impacts on traffic conditions, the project generated traffic volumes shown on Figure 4 were added to the existing traffic volumes. The resulting "existing plus project" traffic volumes are shown on Figure 15.

Significance Criteria

The City of San Diego's significance criteria for intersections are outlined below, as cited in the "California Environmental Quality Act Significance Determination Thresholds" (City of San Diego, July 2016).

The document states that if any intersection affected by a project would operate at LOS E or F under either direct or cumulative conditions, the impact would be significant if the project exceeds the thresholds shown in Table 14.

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Table 14 Significance Thresholds

Level of Service With Project	Delay (seconds) at Intersections
E	2.0
F	1.0

Intersection Impact Analysis

An analysis of traffic impacts was conducted by quantifying the before-and-after traffic volumes, then determining the average delay values and levels of service at the study area intersections for the “without project” and “with project” scenarios. The baseline scenario represents the existing conditions in year 2020.

The before-and-after delay values and levels of service at each of the study area intersections are summarized in Table 15 for the morning and afternoon peak hours. The table shows the existing traffic conditions, the traffic conditions with the additional vehicles generated by the temporarily relocated students, and the increase in delay values associated with the project. The final column in the table indicates if the intersection would be significantly impacted by the proposed school project according to the significance criteria outlined above.

The intersection of Del Mar Heights Road and Mango Drive, for example, currently operates with an average delay value of 31.1 seconds per vehicle and LOS C for existing conditions and with an average delay value of 48.4 seconds and LOS D for the existing scenario plus the proposed school project during the AM peak hour. The additional school traffic would increase the average delay at the intersection by 17.3 seconds and the intersection would not be significantly impacted.

Table 15 indicates that all of the study area intersections would continue to operate at acceptable levels of service (LOS A through D) during the AM and PM peak hours for the scenario with the additional traffic generated by the proposed project. These three most-directly affected intersections would not be significantly impacted according to the significance criteria.

Although the intersections would not be significantly impacted in accordance with the criteria, there would be a noticeable increase in congestion because the levels of service would change from LOS C to LOS D at the intersection of Del Mar Heights Road at Mango Drive during both peak periods and from LOS B to LOS D at the intersection of Mango Drive at Lozana Road during the AM peak hour. Similarly, the level of service at the intersection of Carmel Mountain Road at Canter Heights Drive would change from LOS C to LOS D during the AM peak hour. The changes in LOS and the increases in delays for motorists would be adverse, but not significant by San Diego’s CEQA standards. As noted above, even if the change in LOS were above the City’s standard, this change may not be used as the basis for finding a significant impact pursuant to SB 743 and the new CEQA Guidelines.

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Table 15 Project Impact On Intersection Levels Of Service

Intersection	Delay Value & Level of Service		Increase in Delay Value (seconds)	Significant Impact
	Existing Conditions	Existing Plus Project		
At Del Mar Hills Academy				
Del Mar Heights Road at Mango Drive				
AM Peak Hour	31.1 – C	48.4 – D	17.3	No
PM Peak Hour	29.7 – C	35.5 – D	5.8	No
Mango Drive at Lozana Road				
AM Peak Hour	10.1 – B	28.5 – D	18.4	No
PM Peak Hour	8.6 – A	10.6 – B	2.0	No
At Ocean Air School				
Carmel Mountain Rd at Canter Heights Dr				
AM Peak Hour	31.1 – C	45.0 – D	13.9	No
PM Peak Hour	16.3 – B	17.5 – B	1.2	No

While the levels of service for the intersections as a whole would remain at acceptable levels, there would be some directions of travel and vehicle movements that would be adversely affected at these intersections. For example, the southbound approach of Mango Drive at Del Mar Heights Road currently experiences lengthy queues of vehicles waiting for the green phase to enter the intersection. Motorists often wait for the next green signal cycle before they can pass through the intersection during peak periods. These situations would be exacerbated by the presence of the additional project generated traffic. The impacts would not, however, be deemed as a significant impact because the overall intersection levels of service would be acceptable.

The conclusion of the traffic impact analysis that is summarized in Table 6 is that none of the study area intersections would be significantly impacted by the proposed temporary relocation of students to Del Mar Hills Academy and Ocean Air School according to the significance criteria presented previously.

Project Features

While there are no significant CEQA impacts, the District has committed to a schedule that would separate the arrival and departure times for the buses from the school starting and ending times at Del Mar Hills Academy so that the traffic surges generated by the students using the buses would not coincide with the primary traffic surges associated with the students attending Del Mar Hills Academy. The starting time at Del Mar Hills Academy is 8:00 AM and the ending time is 2:30 PM. Observations during the peak drop-off and pick-up times indicate that the primary surge in traffic volumes occurs between 7:50 and 8:00 AM for student drop-offs and between 2:25 and 2:40 PM for student pick-ups. The District is proposing that the buses transporting students to Ocean Air School would depart from Del Mar Hills Academy at 7:40 AM and would return to Del Mar Hills Academy at 2:50 PM. This 20-minute interval between the bus arrival and departure times and the school's starting and ending times would ensure that the traffic surges would not coincide. This measure would minimize the potential traffic impacts associated with the bus service.

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It should also be noted that the traffic analysis assumes that most of the traffic generated by the arrivals and departures at Del Mar Hills Academy would travel through the intersection of Mango Drive and Del Mar Heights Road. Because of the lengthy queuing and delays on southbound Mango Drive at this intersection, some motorists would likely elect to use alternative routes and use local streets such as Durango Drive, Recuerdo Drive, Mercado Drive, and Boquita Drive to gain access to Del Mar Heights Road. This use of alternate routes would reduce the impacts at the Mango Drive/Del Mar Heights Road intersection.

Comparisons to Previous Student Enrollment Levels

The current enrollment at Del Mar Hills Academy is 266 students. With the temporary addition of 236 K-3 students at the school, the total enrollment for the 14-month interim period would be 502 students. As a comparison, the student capacity at the school is 528 students and the maximum enrollment at the school was 500 students, which occurred in 2001. So, the student enrollment level associated with the project is essentially the same as the previous peak enrollment level, which would not exceed the school's student capacity.

The current enrollment at Ocean Air School is 609 students. With the temporary addition of 203 grade 4-6 students at the school, the total enrollment for the 14-month interim period would be 812 students. As a comparison, the student capacity at the school is 864 students and the maximum enrollment at the school was 801 students, which occurred in 2014. So, the student enrollment level associated with the project is essentially the same as the previous peak enrollment level, which would not exceed the school's student capacity.

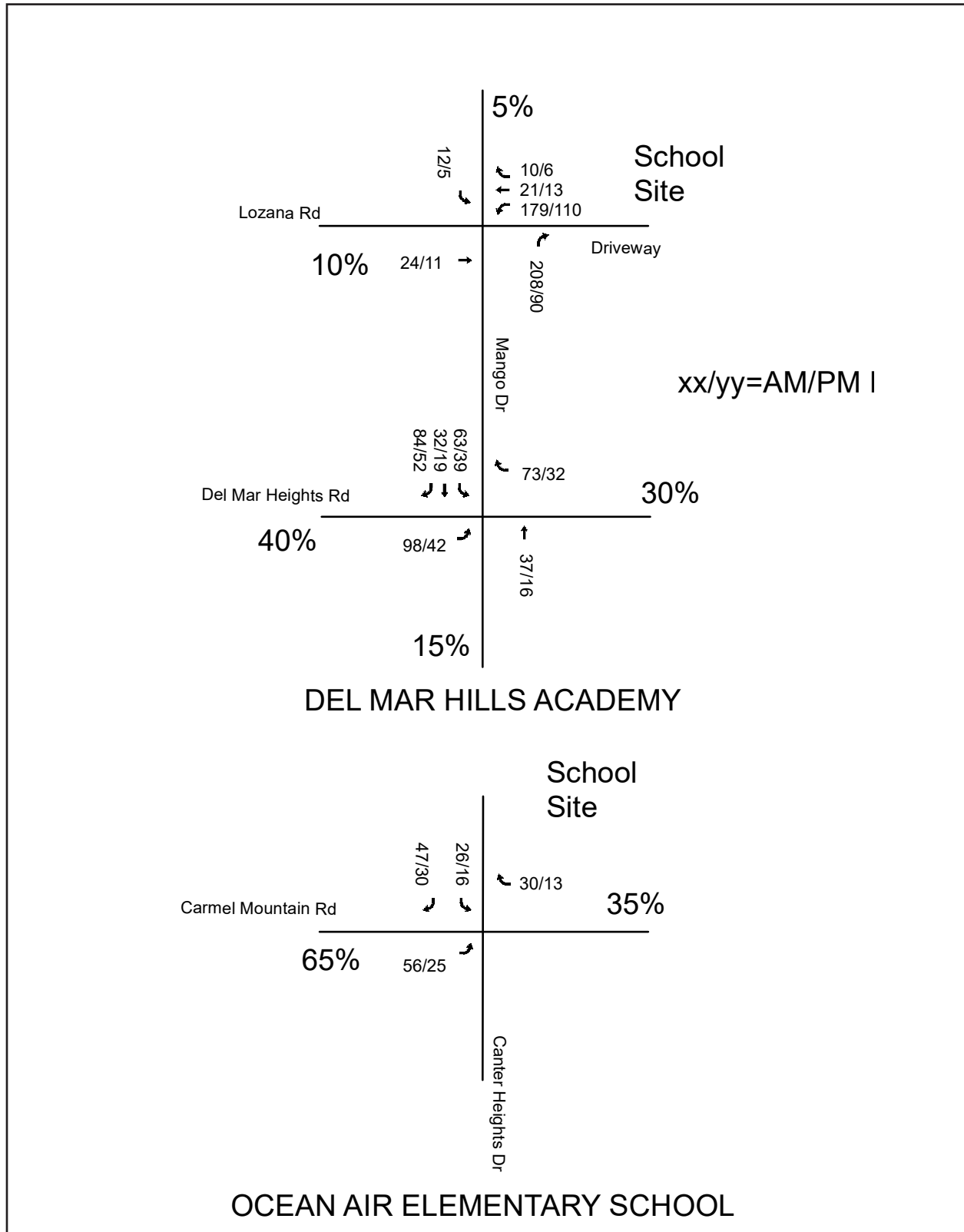
Site Access and Circulation

Del Mar Hills Academy

Vehicular access to Del Mar Hills Academy is provided by a driveway that forms the east leg of the Mango Drive/Lozana Road intersection. For the traffic analysis, it was assumed that all of the additional project generated vehicles would enter and exit the school via this driveway as a worst-case scenario. This driveway provides access to the school's parking lot as well as the student drop-off/pick-up area. Observations at the school during the arrival and departure times indicate, however, that some parents elect to drop off and pick up the students along the curbs of Mango Drive and Lozana Road.

Because of the constrained conditions at the existing on-site parking lot and drop-off/pick-up area, the buses that would be used to transport students from Del Mar Hills Academy to Ocean Air School would use either the curbside parking zone along the east side of Mango Drive or a semi-circular on-site loading area located at the northeast corner of the Mango Drive/Lozana Road intersection. To access this semi-circular loading/unloading area, buses would enter the school's driveway and immediately turn left into the loading zone. Upon departing, the buses would turn left onto Mango Drive and proceed south to Del Mar Heights Road.

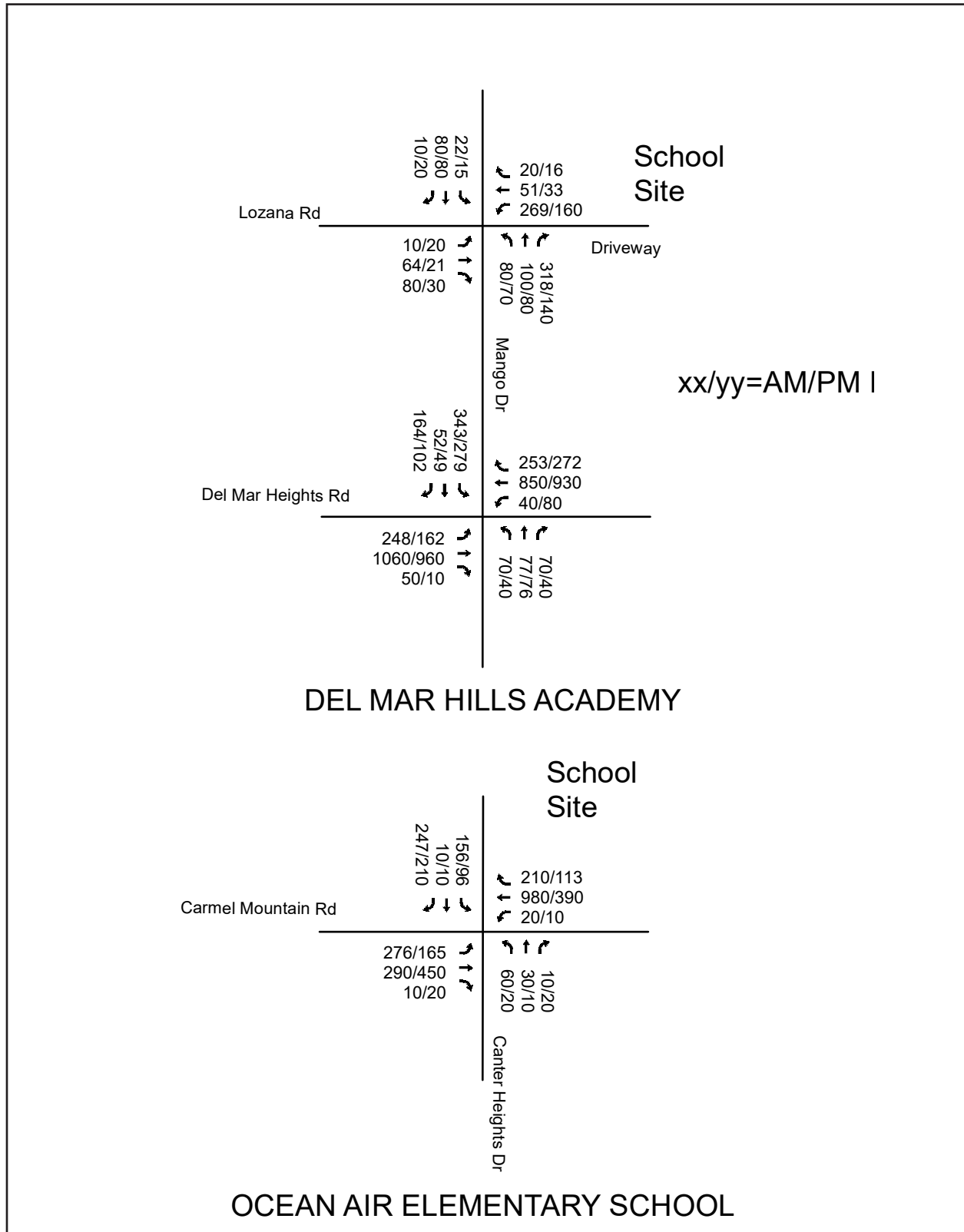
Figure 14 - Project Generated Traffic
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Figure 15 - Existing Plus Project Traffic Volumes
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It is anticipated that three to four buses would be used to transport the students between Del Mar Hills Academy and Ocean Air School. As the semi-circular loading/unloading area is not large enough to accommodate three to four buses, the curbside parking area along the east side of Mango Drive would also be used for bus staging. This activity could be positioned either north of the school's driveway or south of the school's driveway. To ensure that other vehicles would not be parked in these areas, the District would coordinate with the City of San Diego to paint the curbs white and/or to install signs that state "No Parking – 7 AM to 4 PM – School Days – School Buses Excepted." This type of bus loading zone is currently in place on the east side of Mango Drive at the extreme north end of the school campus. This zone would either be expanded or relocated to the south near the intersection of Mango Drive and the school's access driveway. The location and dimensions of the bus loading/unloading zone would be determined through coordination between the District and the City of San Diego.

If the on-street bus loading zone were to be positioned on the east side of Mango Drive south of the school's driveway, the buses could either make a U-turn using the semi-circular loading area and proceed south on Mango Drive to Del Mar Heights Road or they could turn left on Lozana Road and use Recuerdo Drive, Mercado Drive, and Boquita Drive to gain access to Del Mar Heights Road. Durango Drive would not be used as an access route because there is a "Right Turn Only" sign on Durango Drive at its intersection with Del Mar Heights Road.

If the on-street bus loading zone were to be positioned on the east side of Mango Drive north of the school's driveway, the buses would turn left on Vantage Way and use Recuerdo Drive or Boquita Drive to gain access to Del Mar Heights Road.

Ocean Air School

Vehicular access to Ocean Air School is provided by a driveway that is essentially the continuation of Canter Heights Drive onto the school campus. This driveway provides access to the school's parking lot as well as the student drop-off/pick-up area. As there is sufficient capacity within this on-site parking lot and drop-off/pick-up area to accommodate the additional student enrollment and bus operations, it has been assumed that the buses would conduct the student loading and unloading activities at the on-site loading zones and not alongside the curbs of Canter Heights Drive. The buses would enter and exit the school site via the driveway and use Canter Heights Drive as the access route between the school campus and Carmel Mountain Road.

Summary Of Temporary Conditions

The key findings of the traffic impact analysis are presented below.

- The volumes of traffic that would be generated by the proposed project do not represent new traffic on the overall roadway network because the traffic volumes represent vehicles that would be re-directed to the two interim school sites from the existing Del Mar Heights Elementary School.
- An analysis of three intersections in the vicinity of the two school campuses indicates that the additional traffic generated by the proposed temporary relocation of students would not result in a significant impact according to the City of San Diego's significance criteria. This finding is based on a level of service analysis of the projected traffic volumes during the AM and PM peak hours at the beginning and ending of each

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school day. The three intersections that were evaluated are Del Mar Heights Road at Mango Drive and Mango Drive at Lozana Road/School Driveway (for Del Mar Hills Academy) and Carmel Mountain Road at Canter Heights Drive (for Ocean Air School).

- While the levels of service for the intersections would remain at acceptable levels, there would be some directions of travel and vehicle movements that would be adversely affected at these intersections. For example, the southbound approach of Mango Drive at Del Mar Heights Road currently experiences lengthy queues of vehicles waiting for the green phase to enter the intersection. Motorists often wait for the next green signal cycle before they can pass through the intersection during peak periods. These situations would be exacerbated by the presence of the additional project generated traffic. The impacts would not, however, be deemed as a significant impact because the overall intersection levels of service would be acceptable (i.e., LOS A through D).
- While there are no significant CEQA impacts, the District proposes a schedule that would separate the arrival and departure times for the buses from the school starting and ending times at Del Mar Hills Academy so that the traffic surges generated by the students using the buses would not coincide with the primary traffic surges associated with the students attending Del Mar Hills Academy. The starting time at Del Mar Hills Academy is 8:00 AM and the ending time is 2:30 PM. The District proposes a schedule where buses transporting students to Ocean Air School would depart from Del Mar Hills Academy at 7:40 AM and return to Del Mar Hills Academy at 2:50 PM. This 20-minute interval between the bus arrival and departure times and the school's starting and ending times would ensure that the traffic surges would not coincide. This measure would minimize the potential traffic impacts associated with the bus service.
- The temporary student enrollment levels at Del Mar Hills Academy and Ocean Air School associated with the project would essentially be the same as the previous peak enrollment levels and would not exceed the schools' student capacities.
- The buses used to transport students from Del Mar Hills Academy to Ocean Air School would use either the curbside parking zone along the east side of Mango Drive or a semi-circular on-site loading area located at the northeast corner of the Mango Drive/Lozana Road intersection. The curbside parking zone on the east side of Mango Drive could be located either north of or south of the school's access driveway.
- The buses that would use the curbside loading/unloading zones on Mango Drive would use the local streets west of the school campus to access Del Mar Heights Road; i.e., Lozana Road, Recuerdo Drive, Mercado Drive, and Boquita Drive and possibly Vantage Way.
- To ensure that other vehicles would not be parked in the proposed on-street bus loading zones, the District would coordinate with the City of San Diego to paint the curbs white and/or to install signs that state "No Parking – 7 AM to 4 PM – School Days – School Buses Excepted." The location and dimensions of the bus loading/unloading zone would be determined through coordination between the District and the City of San Diego.

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- At Ocean Air School, the buses would conduct the student loading and unloading activities at the school's on-site loading zones.

No impact resulting from hazards due to design features or incompatible uses would occur and no mitigation measures are necessary.

d) Result in inadequate emergency access?

No Impact. Currently, due to the congestion and afternoon queue in the project area, emergency vehicle access is constrained. However, as outlined above, the proposed project would introduce circulation improvements and expand the onsite parking and student loading zone. To address emergency and fire access needs, the improvements are designed in accordance with all applicable City Fire Marshall's design standards for emergency access (e.g., minimum lane width and turning radius). For example, the drive aisles would be designed to meet the minimum width requirements of Fire Marshall to allow the passing of emergency vehicles.

Additionally, the proposed project is required to incorporate all applicable design and safety requirements as set forth in the most current adopted building codes, and fire and life safety standards, subject to review and approval of the State Division of the State Architect (DSA). Compliance with these standards is ensured through the City and DSA' review and building plan check process.

Implementation of the proposed project would not require major road closures or otherwise impact the functionality of Boquita Drive and Cordero Road as a public safety access route.

Based on the preceding, no impact to emergency access would occur no mitigation measures are necessary.

3.18 TRIBAL CULTURAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) 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				X

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		

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

i) 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

No Impact. The project site contains Del Mar Heights School; the project site is not identified as a state or national historic resource. Construction of the proposed project would be within the footprint of the project site's fence line. Therefore, there would be no impacts to historical resources.

ii) 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.

Less Than Significant Impact with Mitigation Incorporated. As stated in Section 3.5.b, the Torrey Pines Community Plan identifies the Sorrento Valley/Los Peñasquitos Lagoon area as the site of the prehistoric Indian Village of Ystagua, which has archaeological remnants unique to the area. According to Figure 5, *Resource Zoning Areas*, of the Torrey Pines Community Plan, the project site is not located in the Sensitive Coastal Resource (SCR) zone or area subject to the Resource Protection Ordinance. Moreover, the project site is fully developed with no visible native ground surface exposed. Implementation of CUL-1 would ensure that if resources are discovered during ground disturbing activities that resources would be recovered in accordance with state and federal requirements. In the event that archeological resources are discovered, a halt-work condition would be implemented, and a qualified archaeologist would be retained to assess such findings. Implementation of Mitigation Measure CUL-1 would reduce impacts to archaeological resources to a less than significant level.

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3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

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

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

Less Than Significant Impact. The proposed project involves the redesign and reconstruction of Del Mar Heights School, which is not expected to increase in capacity. The proposed project would remove all existing utilities onsite and provide new utilities from the existing points of connection to the proposed buildings. Therefore, as utilities would not be expanded or relocated, impacts would be less than significant.

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

Less Than Significant Impact. The proposed project is within the San Diego Regional Water Quality Control Board (RWQCB) (Region 9). The City of San Diego is the City's water, wastewater service, and recycled water provider. The City delivers an average of 200 million gallons per day (mgd) or 224,000 acre-feet per year (AFY) (San Diego 2016b). As student capacity at the school would remain unchanged, the water needs of the school are expected to be similar to existing conditions; therefore, the City's water supply is anticipated to be sufficient for the proposed project and impacts would be less than significant.

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- c) **Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Less Than Significant Impact. The City of San Diego is responsible for the collection of wastewater within the City. The City's wastewater collection system treats approximately 160 mgd of sewage (San Diego 2016b). Wastewater is treated at three plants in the City – North County Water Reclamation Plant, South Bay Water Reclamation Plant, and the Point Loma Water Treatment Plant – which have a combined treatment capacity of 285 mgd (San Diego 2016b). The proposed project would not increase capacity at the school; therefore, it is anticipated that the wastewater facilities would continue to have adequate capacity to serve the proposed project. Therefore, impacts would be less than significant.

- 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?**

Less Than Significant Impact. Waste from the proposed project would be transported to the West Miramar Sanitary Landfill at 5180 Convoy Street in San Diego, California. The West Miramar Landfill has a maximum daily permitted disposal rate of 8,000 tons per day (CalRecycle 2019). The Landfill has a remaining capacity of 15,527,878 cubic yards and a cease operation date of August 31, 2025 (CalRecycle 2019).

The proposed improvements would not result in an increase in the student or staff populations, and therefore, generation of waste during operational activities would be similar to existing conditions. Project impacts on landfill capacity would be less than significant.

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

Less Than Significant Impact. Solid waste would be generated during construction and operation of the proposed project. The proposed project would comply with all regulations pertaining to solid waste, such as the California Integrated Waste Management Act and the City's recycling and waste programs. The District and its construction contractor would comply with all applicable laws and regulations and make every effort to reuse and/or recycle the construction debris that would otherwise be taken to a landfill. Hazardous waste, such as paint used during construction, would be disposed of only at facilities permitted to receive them in accordance with local, state, and federal regulations. The proposed project would comply with all applicable local, state, and federal statutes and regulations related to solid waste disposal. Therefore, impacts would be less than significant.

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3.20 WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
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?			X	

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

Less Than Significant Impact. The proposed project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project site and surrounding properties during construction and post-construction. The proposed project would improve parking and queuing onsite, thereby reducing congestion on the surrounding roadways, and would provide a 20-foot wide fire access lane around the entire campus. Additionally, both the City Fire Marshal and DSA would be required to approve fire access around the site. AS part of the DSA process, a Fire and Life Safety Review would be conducted when DSA would review building construction and how occupants can safely exit the buildings in case of a fire. The proposed project would not result in inadequate emergency access, and impacts would be less than significant.

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

Less Than Significant Impact. There are three primary factors used in assessing wildfire hazards—topography, weather, and fuel. The project site is relatively flat and is in a predominantly urbanized environment. The proposed project would not impact weather or topography. At project completion, the project site would consist of 66,823 square feet of impervious surface in the form of the proposed buildings. According to CAL

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FIRE, the project site is within a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2009). The proposed project would increase impervious surfaces onsite, and therefore, the project and site conditions would not contribute to an increase in exposure to wildfire risk. Additionally, because the project site, as with other portions of the City are located within the VHFHSZ, development on the site would be subject to compliance with California Building Code (CBC) and the County's required defensible space requirement. The buildings would be designed to meet the CBC's Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure, standards; the roofing and exterior coverings would be constructed of Class A non-combustible materials; exterior glazing would be fire resistant; and fire hydrants would be provided around the site to meet current code. Moreover, the entire campus would be equipped with an automatic fire sprinkler system. By complying with the California Building and Fire Codes, as well as the defensible space requirements, impacts would be less than significant.

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

Less Than Significant Impact. Due to the reconfiguration of buildings onsite, the proposed project would require changes to the connections to utilities such as electricity, water, and sewer. The utilities would be installed to meet service requirements. The construction of infrastructure improvements for the project would not directly increase fire risk, and impacts would be less than significant.

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

Less Than Significant Impact. The project site is relatively flat. The project site is located in an area that is generally susceptible to landslides (CDC 1995). Additionally, the project site is located within Flood Zone X – Area of Minimal Flood Hazard (Flood Insurance Rate Map ID #06073C1328G and #06073C1309G) (FEMA 2012). Construction activities related to the proposed project would be subject to compliance with the California Building Code (CBC) and would include best management practices (BMPs). Therefore, with implementation of BMPs and compliance with the CBC, impacts would be less than significant.

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3.21 MANDATORY FINDINGS OF SIGNIFICANCE

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
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.)			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

- 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?

Less Than Significant Impact With Mitigation Incorporated. The proposed project would improve the facilities on the school site as well as improve parking and queuing onsite. The proposed project would not result in an increase in student capacity. The project would comply with the MBTA bird nesting season restrictions and therefore would not result in impacts to nesting regulatory birds protected by the MBTA. The proposed project would occur within the school's existing fence line, with the exception of the outfall drainage which would occur within the property boundary; impacts would be limited to non-sensitive development and ornamental areas of the project site. No sensitive animal or plant species would be impacts. Additionally, the implementation of Mitigation Measures CUL-1 and GEO-1 would ensure that archaeological and paleontological resources, respectively, are protected and preserved. Therefore, impacts would be less than significant with mitigation incorporated.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable

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when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. The proposed project would improve the existing school facilities. The proposed project would not result in an increase in capacity at the school. The proposed project would improve parking and queuing onsite, thereby reducing congestion on the surrounding roadways. Therefore, the proposed project would not result in cumulative impacts in the surrounding area.

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

Less Than Significant Impact. The proposed project would improve the facilities at the school and would improve parking and queuing onsite. By increasing efficiency and flow for vehicles to enter and exit the school property, congestion on adjacent streets would be reduced, thereby creating a safer environment for students who live in the neighborhood to walk and/or bike to campus. Additionally, an ADA-compliant ramp and stairs would be constructed at the southeastern portion of the site and would provide students safer access to the school, as currently, students are accessing this portion of the site via a dirt path. The proposed project would not result in an increase in student capacity. As demonstrated in this Initial Study, the proposed project would not substantially increase environmental effects that would directly or indirectly affect human beings. Impacts would be less than significant.

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