San Diego High School Whole Site Modernization and Long-Range Facilities Master Plan

Initial Study

Prepared for:
San Diego Unified School District
4860 Ruffner Street, Annex Room 5
San Diego, CA 92111

Prepared by:
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May 2020 | SDU-02.18

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TABLE OF CONTENTS

TABLE OF CONTENTS (cont.)

LIST OF FIGURES

ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
BMPs	Best Management Practices
BOE	Board of Education
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDC	California Department of Conservation
CEQA	California Environmental Quality Act
City	City of San Diego
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
GHG	greenhouse gas
HVAC	heating, ventilation, air conditioning
I-5	Interstate 5
IBC	International Building Code
IS	Initial Study
LRFMP	Long-Range Facilities Master Plan
MBTA	Migratory Bird Treaty Act
MHPA	Multi-Habitat Planning Area
MND	Mitigated Negative Declaration
MSCP	Multiple Species Conservation Program
ND	Negative Declaration
NOP	Notice of Preparation
O_3	ozone
PM	particulate matter
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter

ACRONYMS AND ABBREVIATIONS (cont.)

PRC	Public Resources Code
PVC	polyvinyl chloride
RAQS	Regional Air Quality Strategy
SANDAG	San Diego Association of Governments
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDIA	San Diego International Airport
SDUSD	San Diego Unified School District or District
sf	square foot/feet
SR	State Route
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resource Control Board
USEPA	U.S. Environmental Protection Agency
WSM	Whole Site Modernization

1.0 INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

The San Diego Unified School District (District), as the lead agency under the California Environmental Quality Act (CEQA), has prepared this initial study (IS) to evaluate the potential environmental impacts associated with the San Diego High School Whole Site Modernization (WSM) and Long-Range Facilities Master Plan (LRFMP; proposed project). The purpose of the IS is to help focus the scope of the environmental analysis for the Environmental Impact Report (EIR). The proposed project would result in campus upgrades at San Diego High School. Implementation of the proposed project would require approval by the City of San Diego (City) to approve a lease agreement followed by the District's Board of Education (BOE) for physical improvements. As part of the discretionary review process, the proposed project is required to undergo environmental review in accordance with CEQA.

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

The content and format of this report are designed to meet the requirements of CEQA. This IS identifies the potential significant environmental impacts of the proposed project to support the decision to prepare an EIR. This report contains the following sections; Section 1, *Introduction*; Section 2, *Environmental Initial Study Checklist*; Section 3, *References*; and Section 4, *List of Preparers*.

1.2 INITIAL STUDY INFORMATION SHEET

1.	Project title:	San Diego High School Whole Site Modernization and Long-Range Facilities Master Plan
2.	Lead agency name and address:	San Diego Unified School District Facilities Planning and Construction 4860 Ruffner Road San Diego, CA 92111
3.	Contact person and phone number:	Contact: Paul Garcia Phone: 619-913-2999
4.	Project location:	1405 Park Boulevard San Diego, CA 92101
5.	Project sponsor's name and address:	San Diego Unified School District Facilities Planning and Construction 4860 Ruffner Road San Diego, CA 92111
6.	General Plan designation:	Public/Civic and Existing Park/Open Space
7.	Zoning designation:	Centre City Planned District - Public/Civic (CCPD-PC) Centre City Planned District – Open Space (CCPD-OS)

8. Surrounding land uses and setting:

Surrounding Uses

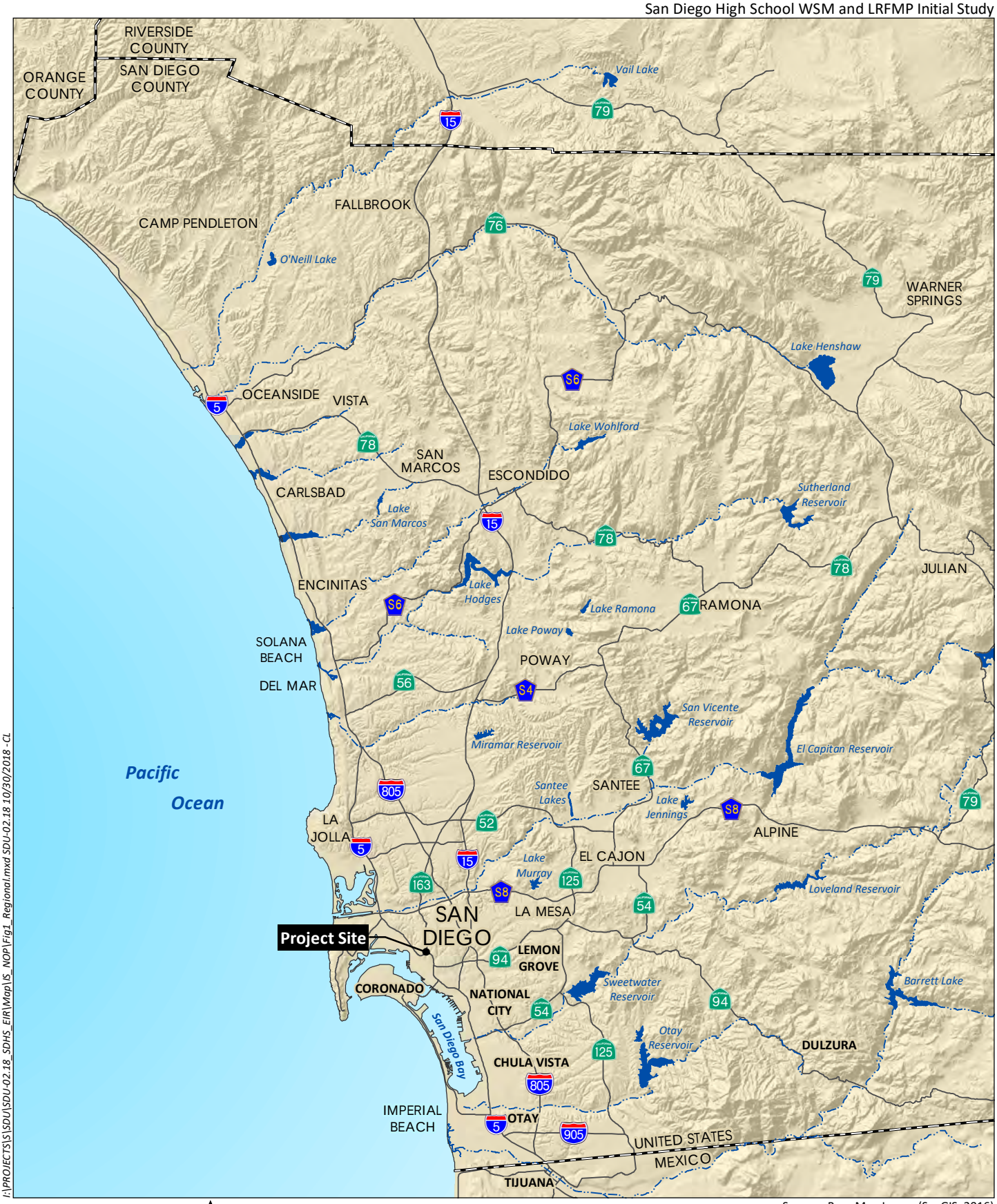
The proposed project is located on an existing, approximately 34-acre parcel at the current location of the San Diego High School campus, located at 1405 Park Boulevard in downtown San Diego. The campus is located in the northeast corner of the City's Downtown Community Plan Area within the northeast sub-district of the East Village neighborhood, which is characterized by multi-story residential, commercial, office, and institutional buildings. The project's location in San Diego County is depicted on Figure 1, *Regional Location*, while Figure 2, *Arial Photograph*, depicts an aerial view of the campus and immediately surrounding areas within downtown San Diego. Figure 3, *USGS Topography*, shows the local topography near the project. As shown, areas adjacent and south of the project site along Russ Boulevard between Park Boulevard and 16th Street include the San Diego City College, which comprises single- and multi-story buildings south of Russ Boulevard for several blocks until Broadway, a major east-west street. Areas further south include multi-story residential development in the East Village neighborhood. Areas east and north of the campus include Interstate 5 (I-5) as it loops around and adjacent to the campus; however, the school campus is separated from I-5 by an approximate 30-foot slope and occurs at a higher elevation than I-5. Further north on the opposite side of I-5 is the Naval Medical Center and the Air and Space Museum within Balboa Park. Areas south of the proposed project site include educational buildings associated with Garfield High School and San Diego City College, followed by State Route 163 (SR 163), located about 300 feet west of the project site.

Project Setting

The District currently holds a lease and an operating agreement for the project site from the City, which expires in the year 2024. A measure authorizing a lease of the property occupied by San Diego High School in Balboa Park (Measure I) was approved by 77.8 percent of voters in November 2016. The District is currently negotiating the terms of the lease with the City and it is assumed the lease will be for a term of 99 years to commence on or before the termination of the existing lease and the operating agreement currently set to expire in 2024. The campus serves students in grades 9 through 12 at San Diego High School, a traditional high school. The project site includes the existing high school campus and some portions of land not included within the legal boundaries of the High School including of Park Boulevard and the I-5 on-/off-ramp near the northern part of the campus.

The campus consists of several single- and multi-story buildings including 118 permanent classrooms, 8 portable classroom buildings, parking areas, hardcourt areas, ballfields, a football stadium (Balboa Stadium), and ornamental landscaping. San Diego High School generally includes 11 buildings (buildings 100 through 1100) and a student quad area in the southwest part of the campus. San Diego High School was originally constructed in 1906 and was incrementally developed between 1912 and 1950. Of the 13 buildings constructed during this time period, three remain, including buildings 500, 600, and 700. The remaining buildings were demolished between 1973 and 1976 to accommodate the construction of four new buildings, buildings 100, 200, 300, and 400. Between 1995 and 2011, 11 additional buildings were constructed.

Regional access to the site is provided via I-5 and SR 163 and local access is provided primarily from Russ Boulevard, where student drop-off and parking areas are located. A pedestrian bridge spans across I-5 from the northeastern part of the campus to a parking lot at the Naval Medical Center. Student and staff parking is available within several small parking lots on campus, including a few lots along Park



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0 8 Miles

Source: Base Map Layers (SanGIS, 2016)

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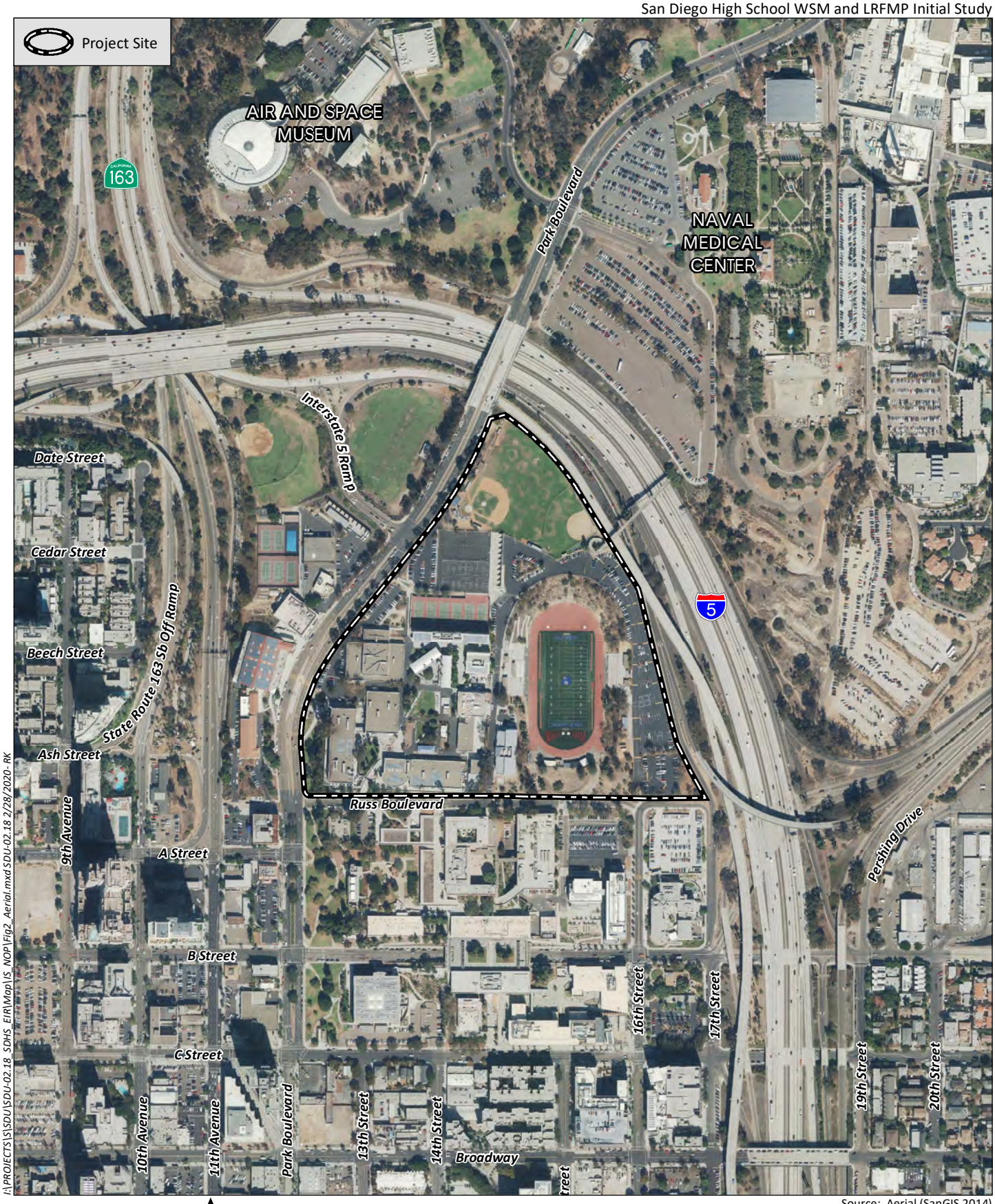
Regional Location

Figure 1



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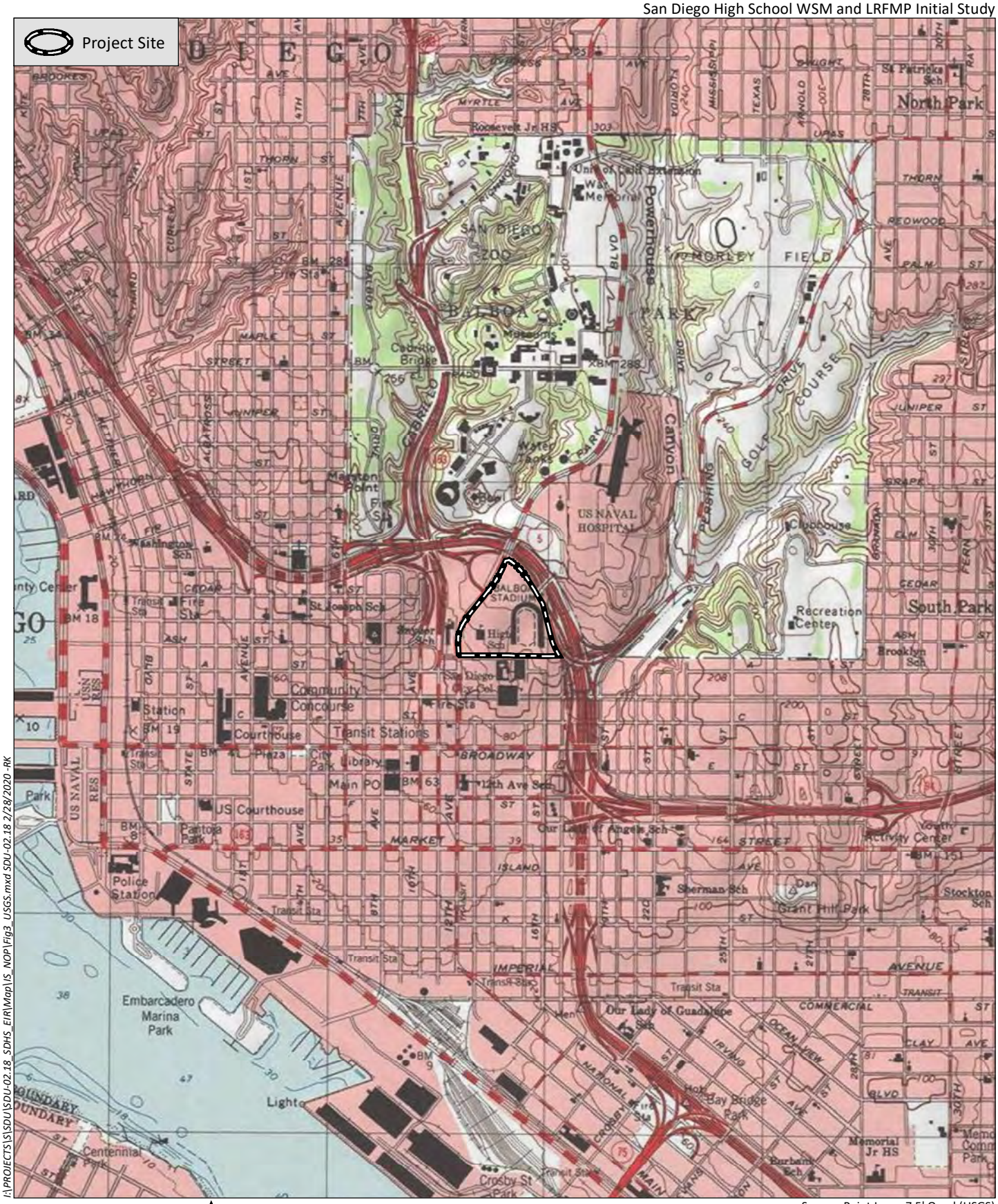
Aerial Photograph

Figure 2



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0 2,000 Feet

Source: Point Loma 7.5' Quad (USGS)

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USGS Topography

Figure 3

Boulevard at the western edge of campus, in the northern part of the campus near the baseball and softball fields, and in the eastern part of campus near I-5, which includes a fence separating staff parking to the north and student parking to the south.

Existing enrollment at San Diego High School is estimated at 2,664 students (with a program capacity for up to 2,916 students) (SDUSD 2020). School is in session at San Diego High School from 7:30 a.m. to 2:30 p.m. on Mondays, Wednesdays, Thursdays, and Fridays, and from 7:30 a.m. to 1:25 p.m. on Tuesdays.

Description of Project

The proposed project involves a lease between the City and the District and upgrades to existing campus. The lease would extend the permission for the District to operate at the project site on or before the expiration of the existing lease and operating agreement in 2024 for up to an additional 99 years. Most of the existing San Diego High School campus was constructed between 1976 and 2001, and while the high school has been updated over the years, much of the site needs renovations, repairs, and/or upgrades. These improvements would occur as part of Propositions S and Z and Measure YY in the near-term (referred to as WSM improvements) and new structures and facilities in the long-term (referred to as LRFMP improvements).

The proposed project involves a lease between the City and the District, and WSM and LRFMP upgrades. The lease would extend the permission for the District to continue operations at the project site consistent with existing use for an additional 99 years from the date of the lease. The lease approval is expected to occur on or before 2024.

Campus-wide WSM improvements would generally involve interior and exterior improvements to existing school buildings. School buildings would be upgraded with plumbing, windows, lighting, painting, signage, and roof improvements, as well as new or replaced heating, ventilation, air conditioning (HVAC). Interior finish upgrades would consist of replacing interior flooring and base, painting walls, ceilings and doors, removing existing casework and providing movable storage, and new window blinds. Other WSM components include, but are not limited to, removal of excess relocatable classrooms, reconfiguration of the upper and lower quad including construction of new food kiosks, improvements to the east parking lot, and construction of new athletic field amenities.

The LRFMP improvements would involve the demolition of buildings 400, 600, and 700 and the construction of several new buildings and facilities on campus. Specifically, the LRFMP projects include the construction of a new two-story classroom building with a lower level parking area, new food service and custodial building, a new aquatic center, a new performing arts building with parking, auxiliary gymnasium, parking structure with tennis courts, and field house. Other LRFMP components to improve project circulation and access include the interior realignment of the existing driveway with I-5 near the new proposed performing arts center and the interior realignment of the 16th Street entrance into the project site. Completion of the WSM improvements and LRFMP improvements would not result in an increase in classroom capacity and are not anticipated to result in an increase in enrollment. Implementation of the LRFMP projects is dependent on the availability of funding.

Construction Activities

The anticipated construction timeline is currently undetermined; however, it would likely begin in the late fall or early winter of 2020. All construction areas and staging areas would be fenced off and isolated from the school. Additional details of construction activity will be provided in the EIR.

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

    - The Division of the State Architect is a reviewing agency that reviews the project design for compliance with the California Code of Regulations, Title 24.

    - City of San Diego (for approval of a lease agreement to allow the WSM and LRFMP improvements and encroachment permits, as required, for modifications within City Right-of-Way).

    - California Department of Transportation (Caltrans; for approval of an encroachment permit during implementation of the LRFMP).

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

Jamul Indian Village requested AB 52 consultation, and consultation was initiated by the District on October 25, 2018. Based on consultation, Jamul Indian Village requested a Kumeyaay Native American monitor for all ground disturbing activities during construction of the proposed project.

1.3 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that may require mitigation to reduce the impact from "Potentially Significant Impact" to "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages. Potential impacts and associated mitigation measures required will be addressed in the EIR.

An IS is conducted by a Lead Agency to determine if a project may have a potentially significant effect on the environment (CEQA Guidelines Section 15063). An EIR must be prepared if an IS indicates that further analysis is needed to determine whether a significant impact will occur or if there is substantial evidence in the record that a project may have a significant effect on the environment (CEQA Guidelines Section 15064(f)). The following environmental topics are identified to be evaluated further during preparation of the EIR.

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

1.4 DETERMINATION

On the basis of this initial evaluation:

☐	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☐	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions 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 "potential impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect I) 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 pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature _____ Date _____

Printed Name: _____ For: _____

2.0 ENVIRONMENTAL INITIAL STUDY CHECKLIST

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

This checklist is adapted from the form provided in Appendix G of the 2019 State CEQA Guidelines. There are 21 CEQA subject categories to be considered, with this checklist organized as such. Each subject discussion includes an evaluation matrix, followed by a brief discussion explaining the evaluation rationale. As appropriate, each subject discussion may address more than one specific issue question if there is a salient interrelation.

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

A. "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.

B. "Less Than Significant with Mitigation" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).

C. "Less Than Significant Impact" applies where the project creates no significant impacts, only less than significant impacts.

D. "No Impact" applies where a project does not create an impact in that category. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which 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).

I. AESTHETICS

AESTHETICS: Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	■	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	■	☐
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	■	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	■	☐

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

Less Than Significant Impact. A scenic vista is generally defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Scenic vistas are commonly identified in local planning documents but can also include public viewpoints not identified within an adopted regulatory document. Within the project vicinity in downtown San Diego, view corridors are identified on Figure 5-1 of the City's Downtown Community Plan towards the San Diego Bay along most east/west oriented streets west of Kettner Street. All of the view corridors are located west of Park Boulevard and the project site, and the proposed project does not occur along or west of any of the view corridors in the Downtown Community Plan. Areas north and west of the project site within Balboa Park, opposite of I-5, include grass and picnic areas with southern and western views towards the project site. While not designated as scenic vistas, these areas do provide views of downtown and San Diego Bay; however, the elevation of the project site is much lower than areas to the north within Balboa Park and the addition of new structures within the campus, as well as temporary construction activities, are not anticipated to result in significant impacts on a scenic vista. No further analysis is anticipated in the EIR.

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

Less Than Significant Impact. The County of San Diego has several designated and eligible state scenic highways, two of which occur near the project site including SR 163, a designated state scenic highway, and I-5, an eligible state scenic highway. There are no other designated or eligible state scenic highways within the vicinity of the project site. Both SR 163 and I-5 occur at a lower elevation than the project site and neither include prolonged views of the project site for motorists. Views of the proposed project components, including taller buildings, would not be expected to be visible or highly noticeable from a state scenic highway and no further analysis is anticipated in the EIR.

c) 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 is located on an existing high school campus in an urban area in downtown San Diego. The project involves upgrades to an existing high school campus including construction of a performing arts center, auxiliary gymnasium, and parking structure and the demolition of several buildings on campus. While the project would not substantially alter the existing visual character of the campus, some visual changes would be noticeable from surrounding areas; however, these changes are not anticipated to be highly noticeable and would not substantially degrade the existing character of the school. Impacts are anticipated to be less than significant and additional analysis in the EIR is not anticipated.

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

Less Than Significant Impact. While the project would involve some additional lighting, improvements associated with the proposed addition of buildings, due to the project's location within an urban downtown area where there are numerous existing sources of light and glare, project-related impacts associated with additional sources of light and glare are not anticipated to be substantial. This would also be consistent with City of San Diego regulations for glare and lighting (Municipal Code Sections 142.0730 and 142.0740).

II. AGRICULTURE AND FORESTRY RESOURCES

AGRICULTURE AND FORESTRY RESOURCES: Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	■
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section l 2220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	■
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■

AGRICULTURE AND FORESTRY RESOURCES: Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	■

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 is in an urbanized area where there is no farmland or agricultural resources. According to the California Department of Conservation's (CDC) San Diego County Important Farmland 2016 map, the project area is classified as "Urban and Built-Up Land," which does not contain agricultural uses or areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (CDC 2018). As such, the proposed project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Therefore, there would be no impact and no additional analysis will be included in the EIR.

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

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

The project area is classified as "Urban and Built-Up Land" by the CDC (CDC 2018). The project area is not zoned for agricultural use, nor are there Williamson Act contracts within the project area (CDC 2018). Additionally, there are no Williamson Act contract eligible lands in the project area. Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract and no additional analysis will be included in the EIR.

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

No Impact. The proposed project is in an urbanized area where there are no forestry resources. The project location is designated as "Urban and Built-Up Land" by the CDC (CDC 2018). The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland resources and no additional analysis will be included in the EIR.

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

No Impact. The proposed project is in an urbanized area where there are no forestry resources. The project location is designated as "Urban and Built-Up Land" by the CDC (CDC 2018). The proposed project would not result in the loss of forest land or convert forest land to non-forest use.

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

No Impact. Implementation of the proposed project would have no impact on agriculture and/or forestry resources. The project location is classified as "Urban and Built-Up Land," which does not contain any agricultural uses or areas designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (CDC 2018). Furthermore, there are no Williamson Act contracts or forest lands in the project area (CDC 2013). Implementation of the proposed project would not involve changes to the existing environment or result in the conversion of Farmland to non-agricultural use or forest land to non-forest use.

III. AIR QUALITY

AIR QUALITY: 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:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	■
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	■	☐	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	■	☐	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	■

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

No Impact. The District is in the San Diego Air Basin (SDAB), which is commensurate with San Diego County. The San Diego Air Pollution Control District (SDAPCD) is required, pursuant to the federal and state Clean Air Acts, to reduce emissions of criteria pollutants for which the SDAB is in nonattainment. The SDAB is currently classified as a moderate nonattainment area for the federal 8-hour ozone (O_3) standard and attainment for all other federal pollutants. In addition, the SDAB is classified as a nonattainment area for state O_3, particulate matter (PM) less than 2.5 microns in diameter ($PM_{2.5}$), and PM less than 10 microns in diameter (PM_{10}) standards (SDAPCD 2018).

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

Construction of the project elements would be required to comply with SDAPCD Rules and Regulations, including Rules 50, 51, and 55, which forbid visible emissions, forbid nuisance activities, and require fugitive dust control measures, respectively. Construction and operation activities that would be reasonably foreseeable with implementation of the proposed project could result in a temporary increase in emissions, including motor vehicle trips, energy consumption, and other sources, compared to existing conditions. However, the proposed project is not anticipated to result in emissions that would exceed existing general plan and SANDAG projections because no increase in operations or student enrollment and no expansion of the existing school campus is considered in this evaluation. Further, there would be no amendment to the any land use or zoning designations as the project site would continue to operate as a school of the same size. As a result, the proposed project would be consistent with local general plans and/or SANDAG's growth projections and no impacts are anticipated.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

Potentially Significant Impact. The project is in the San Diego Air Basin, which is classified as a nonattainment area for certain federal and state designated criteria pollutants, including PM_{10}, $PM_{2.5}$, and O_3. Construction activities that would be reasonably foreseeable with implementation of the proposed project would generate emissions of criteria pollutants, including PM_{10}, $PM_{2.5}$, and O_3 precursors. Once constructed, daytime school activities would continue similar to existing conditions; however, some additional campus operations would result from after-school events at the performing arts center, auxiliary gymnasium, and aquatic center and the project has the potential to cause a cumulatively considerable net increase in criteria pollutants, including those for which the region is in nonattainment. Therefore, further analysis will be provided in the EIR.

c) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. There are several sensitive receptors, including the high school campus itself, present throughout the project area that could be affected by construction and operational activities that would be reasonably foreseeable with implementation of the project. As such, the project has the potential to expose sensitive receptors to substantial pollutant concentrations, which would be a potentially significant impact, and further analysis will be provided in the EIR.

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

No Impact. According to the Air Quality and Land Use Handbook (California Environmental Protection Agency [CalEPA]/CARB 2005), land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting facilities,

refineries, landfills, dairies, and fiberglass molding facilities. The project is not within close proximity to these land uses that generate odors. Additionally, the renovation and development of school facilities on the existing campus would not create objectionable odors. Thus, the project would not generate or expose sensitive receptors to objectionable odors and further analysis in the EIR is not warranted.

IV. BIOLOGICAL RESOURCES

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

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 completely developed as an operating school, and all areas on the campus are either paved or graded. However, the project site contains ornamental vegetation that provides potentially suitable nesting habitat for migratory birds and raptors protected under the federal MBTA and Sections 3503 and 3503.5 of the California Fish and Game Code, which prohibit the take or destruction of migratory birds and raptors, their nests, and/or eggs. Project

construction activities would involve noises in proximity to trees and vegetation that could affect nesting birds during the breeding season (January 15 to August 31) and may involve ornamental vegetation and tree removal. No protected tree species would be removed. During construction, the District would comply with federal and state environmental regulations, including but not limited to the MBTA. The District would retain a qualified biologist to conduct a pre-construction survey if removal of vegetation must occur at any of the project site during the breeding season. The purpose of the pre-construction surveys would be to determine the presence or absence of nesting birds in the proposed areas of disturbance. A pre-construction survey must be conducted within seven calendar days prior to the start of construction activities (including removal of vegetation). If nesting birds are detected the qualified biologist would set up appropriate avoidance construction buffers from the nest and visit the site weekly until it is determined that the fledglings are no longer dependent on the nest. Construction would be delayed or an appropriate buffer established until the end of the breeding season or until the fledglings are no longer dependent on the nest. Implementation of these standard operating procedures established by the District would reduce potential impacts to 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 or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The project site is completely developed as an operating school, and all areas on the campus are either paved or graded. As such, there is no sensitive or riparian habitat on the project site that may potentially be inhabited by federally or state-listed biological species and no impacts are anticipated.

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

No Impact. The project site is completely developed as an operating school, and all areas on the campus are either paved or graded. No federally protected wetlands are present within or adjacent to the project site and no impacts are anticipated.

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?

No Impact. The project site is currently developed as an operating school and is either paved or graded. The project site and surrounding area do not contain any streams or bodies of water that may be inhabited by any native resident or migratory fish species. Because the proposed project would occur on an existing developed school campus, the project site is not considered a migratory wildlife corridor. As such, the proposed project would not interfere with the movement of fish or wildlife and would not affect wildlife corridors.

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

No Impact. The proposed project may involve the removal of ornamental trees from within the school campus to accommodate the proposed development; however, no trees would be removed along the adjacent roadway right-of-way. No protected tree species are present and the project site is not within or adjacent to any Multi-Habitat Planning Area (MHPA) as designated by the City. As a result,

construction and tree removal would not conflict with the City tree ordinances or regulations, such as the City's Environmentally Sensitive Lands Ordinance. Therefore, no impact would occur.

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

No Impact. The project site is completely developed as an operating school and in urban area. In the City, local habitat, species, and biological resources are protected under the City's Multiple Species Conservation Program (MSCP), which is implemented through the MSCP Subarea Plan (City of San Diego 1997). San Diego High School is not within or adjacent to the City's MHPA. As such, the City's MHPA Land Use Adjacency Guidelines would not be applicable to the proposed project and construction and operation of the proposed project would not result in any direct or indirect impacts on the MHPA. Due to the developed nature of the school, no habitat, species, or resources protected under the MSCP are present within the project site and no impacts are anticipated.

V. CULTURAL RESOURCES

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

a-c) **Potentially Significant Impact.** Construction activities that are reasonably foreseeable with implementation of the project may impact cultural resources. A complete review of cultural resources will be included in the EIR, including an evaluation of historical, archeological, and human remains.

VI. ENERGY

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

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

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

No Impact. The proposed project does not involve an expansion of the existing campus or an increase in enrollment related to the WSM and LRFMP improvements. In general, modernization improvements would improve the efficiency of energy use on the campus, such as new and more efficient HVAC systems and replacement building windows that would provide better insulation. As a result, energy use would not be wasteful or unnecessary nor would a state or local renewable energy plan be obstructed or conflicted and no further analysis is warranted in the EIR.

VII. GEOLOGY AND SOILS

GEOLOGY AND SOILS: Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	■	☐	☐	☐
ii. Strong seismic ground shaking?	■	☐	☐	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	■	☐
iv. Landslides?	☐	☐	■	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	■	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	■	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	■
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	■	☐	☐	☐

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?

Potentially Significant Impact. The project area is in a known seismically active region where several known earthquake faults occur. Active faults in the project area include the Point Loma Fault and the Rose Canyon Fault. Portions of the project site are within a State of California Earthquake Fault Zone as indicated by the Alquist-Priolo Earthquake Fault Zoning Map (CDC 2018). A seismic event could cause significant ground shaking in the project area, and, while the potential for ground rupture due to faulting is considered low, lurching or cracking of the ground surface as a result of a nearby seismic event is possible. The project entails upgrading existing facilities and constructing a new performing arts building, parking structure, and auxiliary gymnasium. Construction of the proposed structures would follow existing guidelines set forth by the International Building Code (IBC) and the California Building Code (CBC); however, due to the seismic activity in the project area, additional evaluation will be included in the EIR related to fault rupture.

ii. Strong seismic ground shaking?

Potentially Significant Impact. The project area is in a known seismically active region where several known earthquake faults occur. Active faults in the project area include the Point Loma Fault and the Rose Canyon Fault. Portions of the project site are within a State of California Earthquake Fault Zone (CDC 2018). A seismic event could cause significant ground shaking in the project area. The project entails upgrading existing facilities and constructing a new performing arts building, parking structure, and auxiliary gymnasium. Construction of the proposed structures would follow existing guidelines set forth by the IBC and CBC. Incorporation of such guidelines into the design and construction of the project would minimize potentially significant impacts; however, additional evaluation will be included in the EIR related to seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. According to the City's Seismic Safety Study, the project site is not located in an area where liquefaction is likely to occur during a seismic event (City of San Diego 2008). Additionally, construction of the proposed structures would follow existing guidelines set forth by the IBC and the CBC. Therefore, impacts would be less than significant.

iv. Landslides?

Less Than Significant Impact. According to the City's Seismic Safety Study, the project site is not located in an area where landslides are likely to occur (City of San Diego 2008). Additionally, construction of the proposed structures would follow existing guidelines set forth by the IBC and the CBC and impacts are anticipated to be less than significant.

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

Less Than Significant Impact. The project would not result in impacts associated with soil erosion or loss of topsoil as it is in a previously disturbed area of the existing campus. Potential short-term erosion impacts from construction activities would be addressed through Best Management Practices (BMPs) in accordance with the California Stormwater Best Management Practices Handbook to control erosion and protect the quality of surface water runoff during project construction and impacts are expected to be less than significant.

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

Less than Significant Impact. According to the California Geological Survey, the project site does not fall within an area with the potential for landslide or liquefaction occurrences, lateral spreading, subsidence, or collapse. However, construction and design of the proposed structures would incorporate the measures and recommendations proposed by the IBC and the CBC to accommodate potential geologic hazards. Based on the incorporation of applicable guidelines, potential impacts associated with a geologic unit or soil that is unstable would be less than significant.

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

Less Than Significant Impact According to the California Geological Survey, the project site is not located on expansive soil as defined in Table 18-1-B of the Uniform Building Code. Therefore, impacts would be less than significant.

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. No septic tanks or alternative wastewater disposal systems would be installed as part of the proposed project and no impact would occur.

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

Potentially Significant Impact. Construction activities that are reasonably foreseeable with implementation of the project may impact paleontological resources. Further review will be included in the EIR.

VIII. GREENHOUSE GAS EMISSIONS

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

a-b) **Potential Impact**. Construction and operation of the project would have the potential to generate greenhouse gas (GHG) emissions. Consequently, the project could directly or indirectly have a significant impact on the environment. Activities that would be reasonably foreseeable with implementation of the project could result in emissions that may conflict with state, regional, or local plans, policies, or regulations adopted for the purpose of reducing emissions. Therefore, potential impacts associated with greenhouse gas emissions will be further evaluated in the EIR.

IX. HAZARDS AND HAZARDOUS MATERIALS

HAZARDS AND HAZARDOUS MATERIALS: Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	■	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	■	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	■
e) For a project located within an airport land use plan 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?	■	☐	☐	☐

HAZARDS AND HAZARDOUS MATERIALS: Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death?	☐	☐	■	☐

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. The project would involve updating existing facilities and developing a performing arts center, auxiliary gymnasium, and parking structure on an existing high school campus. Construction that would be reasonably foreseeable with implementation of the proposed project would require the transport, use, and disposal of materials that are typically associated with construction activities, such as diesel fuels, hydraulic liquids, oils, solvents, and paints. This transport, use, and disposal of hazardous materials is regulated by federal, state, and local agencies and regulations, such as the U.S. Environmental Protection Agency's (USEPA's) Resource Conservation and Recovery Act of 1976, the U.S. Department of Transportation's Hazardous Materials Regulations, and the San Diego County Department of Environmental Health's regulations.

Operation and maintenance of school and administrative facilities would not require the use of hazardous materials or generate hazardous waste. Compliance with existing hazardous materials regulations is mandatory; therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

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

Less Than Significant Impact. The project involves updating existing facilities and developing a performing arts center, auxiliary gymnasium, and parking structure on an existing high school campus. The project would comply with all existing hazardous material regulations, and 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?

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

Schools typically do not generate hazardous materials or hazardous waste. As such, the project would not emit hazardous emissions or involve the handling of hazardous or acutely hazardous materials, substances, or waste on the existing school site or within 0.25 mile of an existing or proposed school. Construction and operational impacts would be less than significant.

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?

No Impact. The project is not located on a site included on a list of hazardous material sites pursuant to Government Code Section 65962.5 and does not appear in the State Water Resource Control Board's (SWRCB) Geotracker database (October 2018) or the Department of Toxic Substances Control (DTSC) Envirostor database (October 2018). No impact would occur.

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

Potentially Significant Impact. The San Diego International Airport (SDIA) is located approximately two miles west of the project site. The airport has an Airport Land Use Compatibility Plan (ALUCP) which applies to all projects within the SDIA Influence Area. The basic function of an ALUCP is to promote compatibility between airports and the land uses that surround them. The project is located within the SDIA Influence Area and may require review by the Airport Land Use Commission (ALUC) prior to construction. Construction activities that would be reasonably foreseeable with implementation of the proposed project could include the use of large pieces of construction equipment, such as cranes, or the construction of buildings taller than existing conditions. Therefore, a potentially significant impact could occur, and further analysis is warranted in the EIR.

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

Less Than Significant Impact. Emergency management services for the high school are provided by the San Diego Fire-Rescue Department via Park Boulevard. Construction activities that would be reasonably foreseeable with implementation of the proposed project would have the potential to temporarily restrict access for emergency vehicles traveling to the school. However, construction would be required to comply with the County of San Diego's Emergency Operations Plan, and it is anticipated that construction would not result in the full closure of roadways or other means of emergency access. New operations associated with the project would not impair or interfere with implementation of adopted emergency response plans or evacuation plans. As such, implementation of the project would not impair or physically interfere with an emergency response, 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. State law requires all local governments to identify any Very High Fire Hazard Severity Zone within their jurisdiction (California Government Code Sections 51175–51189). Inclusion within these zones is based on vegetation density, slope severity, and other relevant factors that contribute to fire severity. According to the Very High Fire Hazard Severity Zone maps prepared by the City in collaboration with the California Department of Forestry and Fire Protection, the project is

not located in an area identified as a wildland fire hazard area (City of San Diego 2009). Additionally, the project is in an urban area not associated with wildland fires. Impacts are anticipated to be less than significant.

X. HYDROLOGY AND WATER QUALITY

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

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

Less Than Significant Impact. The proposed project involves internal improvements at the San Diego High School campus in an urbanized area of the City. During construction, excavation activities and exposed soil have the potential to temporarily increase the amount of sediment runoff that would enter the existing storm drain system during a rain event. However, the project would comply with the standards and regulations established by the SWRCB. The SWPPP would require the implementation of BMPs throughout the construction period. Stormwater BMPs would limit erosion, minimize

sedimentation, and control stormwater runoff water quality during construction activities. Compliance with the SWPPP would not degrade local water quality or exceed waste discharge requirements. During project operations, the amount of stormwater runoff from the site would not change substantially after implementation of the proposed project and impacts would be less than significant.

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

Less Than Significant Impact. The improvements associated with the proposed project would not deplete groundwater supplies or interfere substantially with groundwater recharge. The project site is within an established urban community serviced by the City, Public Utilities Department, and the project does not involve the use of groundwater during construction or operation. Additionally, all project improvements would occur within the existing developed school footprint. Any expansion of impervious areas, which could interfere with groundwater recharge, would be minimal. Therefore, the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, and impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

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

Less Than Significant Impact. The project site is currently developed as an operating school within an urbanized area and is almost entirely paved with asphalt or concrete. The project would not result in a substantial alteration of the existing drainage patterns. Additionally, no stream or river courses exist within the immediate vicinity of the school site that could be affected by the project, either through direct modification or from stormwater runoff from the project site. During construction, BMPs would be implemented in compliance with the SWPPP, which would adequately address erosion and siltation issues. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The project site is currently developed as a high school campus within an urbanized area and is almost entirely paved with asphalt or concrete. While internal campus improvements would occur, the project is not expected to substantially alter the existing drainage pattern of the site. Construction BMPs would be implemented in compliance with the SWPPP and the project would not substantially increase the rate or amount of surface runoff or result on- or off-site flooding. Impacts related to changes to existing drainage patterns are expected to be less than significant.

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

Less Than Significant Impact. The project would comply with the SWPPP, which would implement water quality standards and waste discharge requirements. Additionally, the project would not substantially alter the existing drainage pattern of the site and therefore, would not result in a substantial increase in the rate or amount of stormwater runoff from the site. Stormwater runoff from the site during school

operations would continue to be accommodated by the existing stormwater drainage system currently serving the school property. Moreover, BMPs and the existing storm drainage system would adequately provide stormwater detention for the project site. As such, the proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; therefore, no impact is anticipated.

iv. Impede or redirect flood flows?

Less Than Significant Impact. The project site is currently developed as an operating school within an urbanized area and is almost entirely paved with asphalt or concrete. While internal campus improvements would occur, the project is not expected to substantially alter flooding on the site. Construction BMPs would be implemented in compliance with the SWPPP and the project would not substantially impede or redirect flood flows. Impacts are expected to be less than significant.

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

No Impact. The project site is not located downstream of or adjacent to any major water bodies, including lakes or rivers, that could contribute to impacts associated with inundation by seiche or mudflows. The closest water body to the project site is San Diego Bay, which is approximately 1.3 miles southwest of the school. The San Diego Bay would not pose a flooding hazard to the project site due to the substantial distance. Additionally, the likelihood of the project site being inundated by a tsunami is extremely low due to its elevation. Therefore, the proposed project would not contribute to inundation by seiche, tsunami, or mudflow and no significant environmental impacts are anticipated.

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

No Impact. There are no known water quality control plans or sustainable groundwater management plans that apply to the project site and no impact is expected.

XI. LAND USE AND PLANNING

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

a) Physically divide an established community?

No Impact. All development resulting from the project would occur within the boundaries of the existing school site. Therefore, the project would not physically divide an established community and no significant environmental impacts are anticipated.

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

Less Than Significant Impact. The redevelopment and execution of a lease between the City and the District is not expected to result in a conflict with a planning document that was adopted for the purpose of avoiding or mitigating an environmental effect and no further discussion is warranted in the EIR.

XII. MINERAL RESOURCES

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

a-b) **No Impact.** The project site is previously developed and not known to contain mineral resources that would be of value to the region or state. According to the Conservation Element of the City of San Diego's General Plan, the project site is mapped as urban land where no mineral deposits are present. Therefore, no mineral resources that would be of value to the region or the residents of the state would be lost as a result of the project.

XIII. NOISE

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

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

Potentially Significant Impact. Construction and operational activities that would be reasonably foreseeable with implementation of the project could increase noise levels. A noise report will be prepared for the proposed project and further analysis will be provided in the EIR.

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

Potentially Significant Impact. Construction activities that would be reasonably foreseeable with implementation of the project would have the potential to expose persons to or generate excessive groundborne vibration or groundborne noise. While adherence to applicable standards and regulations for groundborne vibration and noise would likely reduce impacts to less than significant, further evaluation will be included in a noise report to be prepared for the project and the results will be provided in the EIR.

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?

Potentially Significant Impact. There are no private airstrips in the project area; however, SDIA is located less than two miles west of the project area. A portion of the project area lies within a noise contour that exceeds a 24-hour average of 70 dBA (A-weighted decibels), according to the ALUCP (SDIA Land Use Compatibility Plan 2014). Therefore, a potentially significant impact could occur and further analysis will be included in the EIR.

XIV. POPULATION AND HOUSING

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

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 involve the construction of any new homes or businesses and would not induce population growth. The project would involve improving campus facilities and

would not induce population growth. Development activities that would be reasonably foreseeable with implementation of the proposed project would result in the generation of temporary construction jobs; however, the additional jobs are expected to be filled by individuals currently residing in the San Diego region. Therefore, the proposed project would not directly or indirectly induce substantial population growth and no impacts are anticipated.

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

No Impact. The project site is a high school campus in an existing urban environment and does not contain any housing units nor would the project involve the construction of replacement housing. No impacts are anticipated.

XV. PUBLIC SERVICES

PUBLIC SERVICES: Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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:				
a) Fire protection?	☐	☐	☐	■
b) Police protection?	☐	☐	☐	■
c) Schools?	☐	☐	☐	■
d) Parks?	☐	☐	☐	■
e) Other public facilities?	☐	☐	☐	■

a-e) **No Impact**. The project involves upgrading and expanding the facilities at an existing high school, and substantial physical effects associated with the project are evaluated throughout this Initial Study. The project would not result in an increase in student enrollment nor would the project contribute to population growth. As such, no additional public services would be required to serve the proposed project site at San Diego High School and no impacts would occur.

XVI. RECREATION

RECREATION: Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	■
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?	☐	☐	☐	■

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

No Impact. An increase in the use of existing parks and recreational facilities typically results from an increase in the number of housing units or residents in an area. The project would not result in an increased number of housing units or residents within the project area because it would promote the expansion of the school campus and enrollment would not increase as a result of the project. The project involves upgrading and expanding the facilities at an existing high school to continue serving current enrollment and public uses consistent with the Civic Center Act, which permits public rental and use of school facilities. As such, the project would not result in an increase in the use of other existing recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.

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?

No Impact. The project involves upgrades to existing facilities on the campus and constructing a performing arts center, auxiliary gym, and parking structure with tennis courts. These facilities would serve the existing and future school populations and their potential to result in physical environmental impacts is analyzed throughout this Initial Study. Proposed campus improvements would be constructed on the existing campus, which is a developed site in an urban environment, with the exception of the I-5 ramp improvements adjacent and west of the campus. Therefore, the project is not anticipated to have an impact on the environment as it relates to the construction of recreational facilities.

XVII. TRANSPORTATION AND TRAFFIC

TRANSPORTATION AND TRAFFIC: Would the project:	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?	■	☐	☐	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	■	☐	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	■	☐	☐	☐
d) Result in inadequate emergency access?	■	☐	☐	☐

a-d) **Potentially Significant Impact.** A comprehensive traffic report will be completed for the proposed project and will evaluate the potential significance of traffic impacts associated with the project, including project actions associated with the I-5 off-ramp. Further traffic analysis will be provided in the EIR.

XVIII. TRIBAL CULTURAL RESOURCES

TRIBAL CULTURAL RESOURCES: Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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	■	☐	☐	☐
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	■	☐	☐	☐

a) 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 PRC Section 5020.1(k)?

   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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact. Pursuant to AB 52, California Native American tribes that are traditionally and culturally affiliated with the area can request notification of projects in their traditional cultural territory. Jamul Indian Village requested AB 52 consultation with the District on future projects; and consultation was initiated by the District on October 25, 2018. No other California Native American tribes are on the District's consultation list for AB 52.

Based on consultation, Jamul Indian Village requested a Kumeyaay Native American monitor for all ground disturbing activities. Further analysis of Tribal Cultural Resources will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

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

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

Less Than Significant Impact. The project would not result in an increase in student enrollment that could necessitate greater demand for new or expanded water or wastewater treatment and future demands on water and wastewater are not expected as a result of the proposed project. Similarly, existing storm water drainage infrastructure at the campus is not expected to be relocated or expanded on the campus. Lastly, electric power, natural gas, and telecommunications facilities are not expected to be relocated or expanded and existing facilities would continue to serve San Diego High School. 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. Construction of the project would require the use of water for activities such as dust suppression and the mixing of concrete; however, any water usage during construction would be minimal and temporary. Implementation of the project would not increase student capacity. Therefore, the demand for water would not be any greater than what currently exists at the site and impacts are expected to remain less than significant.

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

Less Than Significant Impact. Implementation of the project would not increase student capacity. Therefore, the demand for wastewater would not be any greater than what currently exists at the site and impacts would remain 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?

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

Less Than Significant Impact. All non-recyclable solid waste generated during construction would be taken to a landfill with sufficient permitted capacity. The proposed project would not increase student capacity at the school. As such, the amount of solid waste generated by the school would be similar to existing conditions. Therefore, the school would continue to comply with federal, state, and local regulations related to solid waste upon the completion of the project and impacts would be less than significant.

XX. WILDFIRE

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

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

Less Than Significant Impact. Emergency management services for the high school are provided by the San Diego Fire-Rescue Department via Park Boulevard. Construction activities that would be reasonably foreseeable with implementation of the proposed project would have the potential to temporarily restrict access for emergency vehicles traveling to the school. However, construction would be required to comply with the County of San Diego's Emergency Operations Plan, and it is anticipated that construction would not result in the full closure of roadways or other means of emergency access. New operations associated with the project would not impair or interfere with implementation of adopted emergency response plans or evacuation plans. As such, implementation of the project would not impair or physically interfere with an emergency response, 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?

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

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

No Impact. The proposed project is in a highly urbanized area of downtown San Diego and would not be directly affected by wildfires or the uncontrolled spread of a wildfire. As a result, wildfire impacts, including those associated with exposing people or structures to significant risks, would not occur with the proposed project.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

MANDATORY FINDINGS OF SIGNIFICANCE: Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
The lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur. Where prior to commencement of the environmental analysis a project proponent agrees to MMs or project modifications that would avoid any significant effect on the environment or would mitigate the significant environmental effect, a lead agency need not prepare an EIR solely because without mitigation the environmental effects would have been significant (per Section 15065 of the State CEQA Guidelines):				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	■	☐	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present and probable future projects)?	☐	☐	■	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	■	☐

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially

reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. The project site is located in an urban area and completely developed as an operating school. No impacts on habitat or plant or animal communities are anticipated; however, additional analysis related to California history and prehistory will be provided in the EIR.

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

Less Than Significant Impact. State CEQA Guidelines Section 15130 requires a discussion of the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable," meaning that the project's incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects. Cumulative impacts of the project would be less than significant, but further analysis of the project's potential contribution to cumulative impacts will be provided in the EIR.

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

Less Than Significant Impact. As discussed under Section VIII, *Hazards and Hazardous Materials*, substantial adverse effects on human beings from the project are anticipated to be less than significant. However, the EIR will further analyze the necessary issue areas to determine the scope of their impact on human beings, either directly or indirectly.

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