







# CAPITAL IMPROVEMENT PROGRAM

## VOLUME I OF II

Draft Program Environmental Impact Report

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# Acronyms and Abbreviations

| | |
|---|---|
| µg/m$^3$ | micrograms per cubic meter |
| µPa | microPascals |
| °C | degrees Celsius |
| AB | Assembly Bill |
| ACM | asbestos-containing material |
| ADA | Americans with Disabilities Act |
| AFY | acre-feet per year |
| ALUC | Airport Land Use Commission |
| ALUCP | Airport Land Use Compatibility Plans |
| AQIA | Air Quality Impact Analysis |
| AR | Administrative Regulation |
| ASCE | American Society of Civil Engineers |
| ATCM | Airborne Toxic Control Measure |
| BAU | business as usual |
| BMPs | best management practices |
| Board | Board of Education |
| BP | before present |
| BTU | British thermal unit |
| C&D | Construction & Demolition |
| CAA | Clean Air Act |
| CAAQS | California Ambient Air Quality Standards |
| CAFÉ | Corporate Average Fuel Economy Standards |
| CAL FIRE | California Department of Forestry and Fire Protection |
| Cal/OSHA | California Division of Occupational Safety and Health |
| CALGreen | Green Building Standards Code |
| Caltrans | California Department of Transportation |
| CAP | Climate Action Plan |
| CAPCOA | California Air Pollution Control Officers Association |
| CARB | California Air Resources Board |
| CBC | California Building Code |
| CCAA | California Clean Air Act |
| CCA | Community Choice Aggregation |
| CCR | California Code of Regulations |
| CDE | California Department of Education |
| CDFW | California Department of Fish and Wildlife |
| CEC | California Education Code |
| CEQA | California Environmental Quality Act |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CFC | California Fire Code |
| CFPP | Construction Fire Protection Plan |
| CFR | Code of Federal Regulations |
| $CH_4$ | methane |
| CHPS | California High Performance Schools |

| | |
|---|---|
| CHPS | Collaborative for High Performance Schools |
| CHRIS | California Historical Resources Information System |
| CMP | Congestion Management Program |
| CNDDB | California Natural Diversity Database |
| CNEL | Community Noise Equivalent Level |
| CO | carbon monoxide |
| $CO_2$ | carbon dioxide |
| $CO_2e$ | carbon dioxide equivalent |
| COP21 | 21st session of the Conference of Parties |
| CPUC | California Public Utilities Commission |
| CRHR | California Register of Historical Resources |
| CTR | California Toxics Rule |
| CUPA | Certified Unified Program Agency |
| CWA | Clean Water Act |
| dB | decibel |
| dBA | A-weighted decibels |
| DEH | Department of Environmental Health |
| District | San Diego Unified School District |
| DOD | Department of Defense |
| DOT | Department of Transportation |
| DPM | diesel particulate matter |
| DPR | Department of Recreation |
| DSA | Division of the State Architect |
| DTSC | Department of Toxic Substances Control |
| EDR | Environmental Data Resources |
| EIR | Program Environmental Impact Report |
| EMS | Energy Management Systems |
| EO | Executive Order |
| EPA | Environmental Protection Agency |
| ESA | Environmental Site Assessment |
| ESAC | Environmental Sustainability Committee |
| ESLs | environmentally sensitive lands |
| ESPs | energy service providers |
| EV | Electric Vehicle |
| FAA | Federal Aviation Administration |
| Facilities Master Plan | Long-Range Facilities Master Plan |
| FEMA | Federal Emergency Management Agency |
| FGC | California Fish and Game Code |
| FHSZ | fire hazard severity zones |
| FHWA | Federal Highway Administration |
| FPC | Facilities Planning and Construction |
| FPP | Fire Protection Plan |
| FRA | Federal Responsibility Area |
| FTA | Federal Transit Administration |
| FUDS | Formerly Used Defense Sites |
| GHG | greenhouse gas |

| | |
|---|---|
| GIS | geographic information system |
| GWP | global warming potential |
| HABS | Historic American Buildings Survey |
| HAER | American Engineering Record |
| HALS | Historic American Landscape Survey |
| Handbook | San Diego Unified School District CEQA Handbook |
| HAP | hazardous air pollutants |
| HCP | habitat conservation plan |
| HFC | Hydroflourocarbon |
| HMD | Hazardous Materials Division |
| hp | horsepower |
| HRB | Historic Resources Board |
| HRE | Historical Resource Evaluation |
| HUs | hydrologic units |
| HVAC | heating, ventilation and air conditioning |
| Hz | Hertz |
| IBC | International Building Code |
| IFC | International Fire Code |
| in/s | inches per second |
| IOUs | investor-owned utilities |
| IPCC | Intergovernmental Panel on Climate Change |
| JPA | Joint Powers Authority |
| JRMP | Jurisdictional Runoff Management Plan |
| kHz | kilohertz |
| LBP | lead-based paint |
| LCFS | low carbon fuel standard |
| LCP | Local Coastal Program |
| $L_{dn}$ | Day-Night Sound Level |
| LED | light-emitting diode |
| $L_{eq}$ | Equivalent Sound Level |
| LID | Low Impact Development |
| $L_{max}$ | Maximum Sound Level |
| $L_{min}$ | Minimum Sound Level |
| LOP | Local Oversite Program |
| LOS | level of service |
| LRA | Local Responsibility Area |
| LRMOSP | Long-Term Resource Management Options Strategic Plan |
| LV | Vibration Velocity Level |
| $L_{xx}$ | Percentile-Exceeded Sound Level |
| MBTA | Migratory Bird Treaty Act |
| MCAS | Marine Corps Air Station |
| MCEG | Maximum Considered Earthquake Geometric Mean |
| MCNH | Murphy Canyon Naval Housing |
| MD | munitions debris |
| MEC | munitions or explosives of concern |
| $mg/m^3$ | milligrams per cubic meter |

| | |
|---|---|
| mgd | million gallons per day |
| MHPA | Multi-Habitat Planning Area |
| MLD | Most Likely Descendent |
| MND | Mitigated Negative Declaration |
| MRP | Munitions Response Plan |
| MRZ | Mineral Resource Zone |
| $MS_4$ | Municipal Separate Storm Sewer System |
| MSAT | mobile source air toxics |
| MSCP | Multiple Species Conservation Program |
| MT | metric tons |
| $N_2O$ | nitrous oxide |
| NAAQS | National Ambient Air Quality Standards |
| NAHC | Native American Heritage Commission |
| NAT | no action taken |
| NAVAIDS | navigational aids |
| NBSD | Naval Base San Diego |
| NCCP | natural community conservation plan |
| NCWRP | North City Water Reclamation Plant |
| ND | Negative Declaration |
| NDC | Nationally Determined Contributions |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NHPA | National Historic Preservation Act |
| NHTSA | National Highway Traffic Safety Administration |
| NO | nitric oxide |
| $NO_2$ | nitrogen dioxide |
| NOP | Notice of Preparation |
| NOSSA | Naval Ordnance Safety and Security Activity |
| $NO_X$ | nitrogen oxides |
| NPDES | National Pollutant Discharge Elimination System |
| NPS | National Parks Service |
| NRHP | National Register of Historic Places |
| NSR | New-Source Review |
| NTR | National Toxics Rule |
| OEHHA | Office of Environmental Health Hazard Assessment |
| OPR | Office of Planning and Research |
| OPSC | Office of Public School Construction |
| OSH | Occupational Safety and Health |
| OSHA | Occupational Safety and Health Administration |
| PA | public address |
| Pb | lead |
| PCB | polychlorinated biphenyls |
| PDPs | Priority Development Projects |
| PEA | Preliminary Environmental Assessment |
| PEA/RAW | Preliminary Endangerment Assessment/Removal Action Workplan |
| PEIR | Program EIR |
| PFCs | perfluorocarbons |

| | |
|---|---|
| PLWTP | Point Loma Wastewater Treatment Plant |
| PM | particulate matter |
| ppb | parts per billion |
| ppm | parts per million |
| PPV | Peak Particle Velocity |
| PRC | Public Resources Code |
| Proposed Program | Capital Improvement Program and the San Diego Unified School District CEQA Handbook |
| PV | photovoltaic |
| PWA | Public Works Administration |
| RAQS | Regional Air Quality Strategy |
| RAW | Remedial Action Workplan |
| RCRA | Resource Conservation and Recovery Act of 1976 |
| Regional Plan | San Diego Forward: Regional Plan |
| RES | Regional Energy Strategy |
| RMS | root-mean-square |
| RPS | Renewables Portfolio Standard |
| RTP | Regional Transportation Plan |
| RWQCB | Regional Water Quality Control Board |
| SAFE | Safer Affordable Fuel-Efficient |
| SANDAG | San Diego Association of Governments |
| SB | Senate Bill |
| SBWRP | South Bay Water Reclamation Plant |
| SCAQMD | South Coast Air Quality Management District |
| SCH | State Clearinghouse and Planning Unit |
| SCIC | South Coastal Information Center |
| SCS | Sustainable Communities Strategy |
| SDAB | San Diego Air Basin |
| SDAPCD | San Diego Air Pollution Control District |
| SDFD | San Diego Fire-Rescue Department |
| SDG&E | San Diego Gas and Electric |
| SDIA | San Diego International Airport |
| SDNHM | San Diego Natural History Museum |
| SDP | Standard Development Project |
| $SF_6$ | sulfur hexafluoride |
| SHPO | State Historic Preservation Officer |
| SIP | State Implementation Plan |
| SJVAPCD | San Joaquin Valley Air Pollution Control District |
| SLCPs | short-lived climate pollutants |
| SMAQMD | Sacramento Metropolitan Air Quality Management District |
| $SO_2$ | sulfur dioxide |
| SOI | Secretary of the Interior |
| SPCC | Spill Prevention, Control, and Countermeasure |
| SR- | State Route |
| SRAs | State Responsibility Areas |
| SRTS | Safe Routes to School |

| | |
|---|---|
| STEM | science, technology, engineering, and mathematics |
| SWPPP | Storm Water Pollution Prevention Plan |
| SWQMP | Storm Water Quality Management Plan |
| SWRCB | State Water Resources Control Board |
| TACs | toxic air contaminants |
| Tanner Act | Toxic Air Contaminant Identification and Control Act |
| T-BACT | Toxics Best Available Control Technology |
| TDM | Transportation Demand Management |
| TIA | Transportation Impact Analysis |
| TMDL | total maximum daily load |
| USACE | U.S. Army Corps of Engineers |
| USC | United States Code |
| USFWS | U.S. Fish and Wildlife Service |
| UWMP | Urban Water Management Plan |
| UWR | Universal Waste Rule |
| UXO | unexploded ordinances |
| VMT | vehicle miles traveled |
| VOCs | volatile organic compounds |
| WDRs | waste discharge requirements |
| WHO | World Health Organization |
| WPA | Works Progress Administration |
| WQIP | Water Quality Improvement Plan |
| WUI | wildland-urban interface |
| WWTP | wastewater treatment plants |
| ZNE | zero net energy |

# Introduction

This chapter provides a summary of the Draft Program Environmental Impact Report (PEIR) for the *San Diego Unified School District CEQA Handbook* and Capital Improvement Program (Proposed Program), prepared in compliance with the California Environmental Quality Act (CEQA). The San Diego Unified School District (District) is the CEQA Lead Agency for the PEIR and, as such, has the primary responsibility for evaluating the environmental effects of the Proposed Program and considering whether to approve or disapprove the Proposed Program in light of these effects.

As required by CEQA, this Draft PEIR: (1) describes the Proposed Program, including its location, objectives, and features; (2) describes the existing conditions at the program sites and nearby environs; (3) analyzes the direct, indirect, and cumulative adverse physical effects that would occur on the existing conditions should the Proposed Program be implemented; (4) identifies feasible means of avoiding or substantially lessening the significant adverse effects; (5) provides a determination of significance for each impact after mitigation is incorporated; and (6) evaluates a reasonable range of feasible alternatives to the Proposed Program that would meet the basic objectives and reduce a Program-related significant impact.

This Executive Summary covers the following topics: (1) Project Description; (2) Areas of Controversy/Issues Raised by Agencies and the Public; and (3) Issues to Be Resolved, including significant environmental effects and the consideration of alternatives to the Proposed Program.

# Project Description

## Overview

The Proposed Program includes two components: the establishment and implementation of the Capital Improvement Program to repair, renovate, and revitalize District schools and the preparation of the *San Diego Unified School District CEQA Handbook*. Pursuant to CEQA, the District currently conducts a separate impact analysis for each of its capital improvement projects. To improve efficiency, the District proposes to establish the Proposed Program to repair, renovate, and revitalize District schools and administration facilities. The Proposed Program is a discretionary action and must be approved by the District's Board of Education (Board). The repair, renovation, and revitalization projects associated with the Proposed Program would include a wide range of future construction and operational activities on either existing school sites or administration facilities or on new, currently unidentified sites. While no site-specific projects are proposed at this time, the Proposed Program consists of several types of common District capital improvement projects that could be implemented at any of the District's school or administrative sites.

## Project Location

The Program area includes the entire boundary of the District, which is primarily located within the City of San Diego jurisdictional boundaries in the southwestern portion of the City but also includes

a small portion of the City of La Mesa, the City of Lemon Grove, and unincorporated San Diego County. However, all existing District facilities are within the boundaries of the City of San Diego. Neighboring San Diego County school districts include: Del Mar Union, San Dieguito Union High School, and Poway Unified to the north; Santee, Cajon Valley Union, Lemon Grove, and Grossmont Union High School to the east; and Coronado Unified, National Elementary, Chula Vista Elementary, and Sweetwater Union High School to the south.

# Project Objectives

The District has identified the following objectives for the proposed project:

1. Meet the Board of Education Vision 2020 plan to develop a quality school in every neighborhood by facilitating approval of the following at specific school sites:
    - Improving school security, emergency communications, controlled-entry points, and door locks so that students and staff have the right to a safe and secure campus where they are free from physical and psychological harm.
    - Upgrading classrooms/labs for vocational/career, science, technology, and math education to provide for a unique opportunity for in-depth studies in a specific area of interest.
    - Repairing foundations, bathrooms, and plumbing to provide healthful, safe, and adequate facilities that enhance the instructional program.
    - Removing lead in drinking water and hazardous asbestos to provide a safe and healthy environment at school facilities for students, staff, and community members.
    - Acquiring property for neighborhood and charter schools to best serve the District's educational needs in accordance with the District's Long-Range Facilities Master Plan and State law, to provide diverse learning opportunities for District students, and to accommodate and contribute to other community needs.
2. Allow for the continued implementation of repairs, renovations, and/or upgrades of specific school sites and facilities consistent with requirements specified in current and future funding mechanisms and to ensure that the adequacy, design, and conditions of existing District facilities meet the needs of the instructional program and to maintain clean and inviting schools that are worthy of our students and families.
3. Facilitate agreements with any public agency, public institution, and/or community organization for use of community facilities for school programs or to make school facilities or grounds available for use by those entities and allow for community and school use of District athletic fields and lighted stadiums in a way that maximizes benefits to the school and its students while minimizing negative impacts on the surrounding community.
4. Develop District-specific CEQA guidelines and criteria, and standard construction and operating procedures to allow for a consistent streamlined process for future environmental reviews of specific school capital improvement and maintenance projects in order to maximize efficiency and provide updated facilities for students as quickly as possible.
5. Improve and modernize District facilities to retain and encourage students to return to their neighborhood schools.

# Project Components

## Capital Improvement Program Project Categories

The Proposed Program consists of improvements identified in the 2008 Long-Range Facilities Master Plan and Propositions S, Z, and YY, as well as other potential projects not identified within existing documents or specific bond measures that are described in this PEIR. For the purposes of this PEIR, the Proposed Program consists of four project categories that represent typical capital improvement projects that could be implemented at any of the District's schools and administrative sites. These four categories are based on project scope and type of construction. This PEIR evaluates the potential physical environmental impacts associated with each of these project categories. As such, the environmental analysis for each issue area in this document considers the following typical project categories:

1. New Acquisition and New School or Administrative Facilities Construction
2. Whole Site Modernization
3. Upgrades of Existing School and Administrative Sites
4. Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

A detailed description of each of these project categories and the types of improvements that could be included under them is provided below. Unless noted otherwise, all District projects are required to be designed in compliance with applicable federal, state, and local regulations and standards, including, but not limited to, the Americans with Disabilities Act (ADA), Title IX of the federal Education Amendments of 1972, Title 5 of the California Code of Regulations, Title 24 of the California Building Standards Code, and the Collaborative for High Performance Schools (CHPS) standards.

### New Acquisition and New School or Administrative Facilities Construction

This project category includes the acquisition of new properties and the construction of new school or administrative facilities. The construction of new District-operated school facilities provides District students with the opportunity to attend a school in their neighborhood. New schools could be constructed to provide increased capacity for a cluster area, reduce travel time outside of the community, or otherwise fill an identified need within the neighborhood, such as the need for a new school to serve an increase in residential density provided for in a community plan update.

This project category also includes the construction of new charter school facilities. Charter schools are public schools that may provide instruction in grades kindergarten through 12 (District 2018). Charter schools are usually created or organized by a group of parents, teachers and other educators, and community leaders or community-based organizations. The specific goals and operating procedures for a charter school are detailed in the agreement (or "charter") between the board and the organizers.

Proposition 39, introduced on the November 2000 ballot, amended California Education Code (CEC) Section 47614 with the intent that public school facilities should be shared fairly among all public-school pupils, including those attending charter schools. As amended, CEC Section 47614 requires that school districts make available to all charter schools operating in their school district, with projections of at least 80 units of average daily attendance, facilities that will sufficiently

accommodate all of the charter schools' in-district students, and that facilities be reasonably equivalent to other classrooms, buildings, or facilities in the district. The District's Real Estate Department is responsible for managing charter school leases of District facilities. Pursuant to Proposition 39, charter schools can be collocated on the same school site as District schools, though their facilities are separate. This can typically involve the installation of portable buildings or the use of existing portables on the school site. Collocation of a charter school is equivalent to new school construction, as it would allow for a new school to operate in an area.

Acquisition of property for new school uses, including charter schools, would be conducted in accordance with California Department of Education requirements, particularly Title 5 of the California Education Code, as well as other applicable regulations. Exact construction specifications would be determined on a project-by-project basis; however, typical features of new school construction generally consist of a wide variety of components, including, but not limited to, the following:

- New classrooms, administrative buildings, and other school facilities, including those that meet the needs of special education or people with disabilities.
- New science/technology laboratories and up-to-date classroom and instructional technology systems.
- New outdoor play areas, including hard court areas, playfields, and other physical education facilities.
- Collocation of a charter school onto an existing District school site.
- New parking lot(s).
- Sustainable landscaping, recycled water systems for irrigation, and energy efficient facilities.

Construction of new schools or administrative facilities would involve substantial ground-disturbing activities, occur over a period of several years, and require the use of heavy equipment. This project category may also include the redesign or reuse of an existing building on a site acquired by the District, which may result in minor ground disturbance. Operation of new schools, including new or collocated charter schools, would result in the congregation of students to a new area and bring different activities, such as recess and sports games, to the area. Similarly, operation of new administrative facilities would bring District staff to a new area. There are no specific new acquisitions, or new school or administrative facilities construction projects identified at this time. However, this PEIR analyzes the impacts for any future site acquisitions or new school or administrative facilities projects within the District at a programmatic level.

## Whole Site Modernization

Whole site modernization projects involve substantial redevelopment of existing school properties, including charter schools. Many schools were constructed in the mid- to late-1900s, and numerous buildings remain that have been minimally updated and enhanced throughout the years. School sites where a majority of the existing facilities require upgrades and enhancements would be candidates for whole site modernization projects. Additionally, this project category includes renovation of existing District administrative facilities.

These types of projects generally consist of a wide variety of components, including, but not limited to, the following:

- Demolition of existing facilities and the construction of new buildings including, but not limited to, the construction of new, and reconstruction of existing, library/media centers, performing arts buildings, theaters, and auditoriums.
- Improved athletic facilities, such as new athletic fields, stadiums, public address (PA) systems, or field lighting, gymnasiums, and other improvements such as installation of artificial turf fields to replace existing athletic facilities or the reconfiguration of existing athletic facilities, as well as the development of field use policies for school and third-party use of both existing and improved athletic facilities.
- Construction of new permanent classroom buildings to replace existing modular or permanent classroom buildings, or reconfiguration of existing classroom buildings.
- Demolition of modular classrooms and staging of modular classrooms for other District sites.
- Construction of new, or reconfiguration of existing, restrooms.
- Slope repairs.

Other upgrades—such as security enhancement, energy improvements (e.g., renewable energy systems and energy efficiency improvements), joint-use facility development, and technology and safety repairs—can be included as part of a whole site modernization project, or they can be conducted as individual and separate improvement projects. These upgrades are discussed further as separate categories in the sections below.

Construction activities associated with whole site modernization projects would generally involve substantial ground disturbance, occur in phases over a period of several years, and require the use of heavy equipment. Operation of a modernized school and administrative facility would be similar to operations as existing facilities; however, this project category could include new or reconfigured pick-up and drop-off locations. Operation of these types of projects would not increase the student enrollment capacity of the subject school or number of staff at District administrative facilities.

## Upgrades of Existing School and Administrative Sites

Upgrades of existing school and administrative sites, including charter schools, could involve the implementation of a variety of site-wide improvements, including, but not limited to, the following:

- Construction of new, or reconfiguration of existing, driveways, drop-off zones, bus loading areas, and parking lots for improved safety and circulation of vehicles and pedestrians.
- Construction of new, or reconfiguration of existing, ADA pathway, ramp, and elevator improvements.
- Construction of new, or reconfiguration of existing, hardscape and landscape areas.
- Modernization and renovation of school facilities to comply with Title IX gender equity requirements.
- Improvements to visual and performing arts, physical education, athletic, and science education facilities.
- Replacement of fire alarms, emergency communication systems, security fencing, and various site security improvements.
- Technology upgrades, such as wired and wireless infrastructure and equipment upgrades.

- Improvements to the seismic structural integrity of school buildings.
- Heating, ventilation, and air conditioning (HVAC) system upgrades or additions.
- Installation of solar panels and other energy efficiency upgrades.
- Utility upgrades, such as electrical, water, sewer, and storm drains.
- Other interior finishes such as the provision of new classroom furniture, interior and exterior painting and repairs, and the reconfiguration of existing classroom spaces.
- Wall, pole, or ground mounted marquee sign or other wayfinding monuments.

These improvements would be implemented at schools and administrative facilities that require minimal, specific improvements instead of whole site modernization. Improvements such as ADA upgrades; Title IX improvements; overhauls of failing building systems; painting, window replacement, and maintenance and repair activities; emergency system improvements; electrical and technological upgrades; and improvements to performing arts, athletic, and science education facilities would be broad and vary across each campus or administrative site. However, these improvements could generally include installation of ramps outside buildings and interior upgrades to existing structures. Safety improvements to circulation and parking areas could include restriping and repaving of existing paved areas.

Specific designs for HVAC system improvements or additions that would be installed under this project category would vary depending on the existing site plan for each school campus or administrative site. HVAC system improvements could include the installation of units and duct work on the roof or windows of existing buildings, as well as electrical work and construction within building interiors. Minimal trenching may be required for condensate drainage or other utilities.

Solar panel or other energy efficiency upgrades under this project category would typically consist of solar photovoltaic arrays mounted onto building roofs or canopies in parking lots with associated monitoring equipment and electrical wiring for the inverters and integrated disconnects. While less common, ground-mounted solar arrays could also be installed under this project category. Electrical transmission lines may be installed in underground conduit.

Marquee signs installed under this project category would typically be 5- by 9-foot, single- or double-sided, and would include an internally illuminated full-color LED, dimmable, and timer controlled display. Additionally, the marquee signs would use full-color LED lighting to create text and graphics. The text could be displayed using a variety of display options such as sparkle, flash, blink, and scroll to create a message. Transitions between messages would typically occur every 1 to 4 seconds, with individual messages being displayed between approximately 4 and 10 seconds. Lastly, marquee signs would either be wall or dual pole mounted on the school campus. The District would pre-program any new marquee signs to automatically turn off from 11:00 p.m. to 7:00 a.m., for consistency with the City of San Diego Municipal Code, Chapter 14, General Regulations.

Construction of these types of projects would generally result in minimal or no ground-disturbing activities and would not require the use of heavy equipment. The construction period would typically last less than a year. Operation of these types of projects would not increase the student enrollment capacity of the subject school or number of staff at District administrative facilities and would not change or add activities at existing school sites.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

Joint use facility projects involve construction and operation of new recreational facilities intended for future joint use between the District and City of San Diego as part of the Play All Day Program. The Play All Day Program is a collaboration between the District and City to expand recreational opportunities throughout San Diego and help the City address park space deficiencies in each of its communities. Under the Play All Day Program, new joint-use parks would be constructed by the District on existing school sites using bond funds, while the City Parks and Recreation Department would be responsible for operation and maintenance of the new facilities.

In addition, this project category includes future joint-use agreements administered at existing recreational facilities, operation of existing joint-use agreements at existing recreational facilities, and extensions of existing joint-use agreements. Joint-use with the City of San Diego would be consistent with the Recreation Agreement of September 1948 between the City and the District, and the Memorandum of Understanding between the City and District for the Development and Maintenance of Joint Use Facilities adopted by the San Diego City Council on October 7, 2002 (Resolution No. 297149) and by the District's Board of Education on October 8, 2002. These projects can typically include the following components:

- Removal of existing decomposed granite fields.
- Installation of a new natural or artificial turf field.
- Installation of a new stabilized walking track (decomposed granite or asphalt).
- Construction of pools and associated facilities such as equipment buildings, bleachers, restrooms/changing facilities, and concessions facilities.
- Construction of additional parking to accommodate joint-use facility users in accordance with the parking requirements in the City's Municipal Code (Section 142.050 et seq.).
- Other minor amenities that would provide a new recreational space for students and nearby residents in the community, including comfort stations, benches, hard court areas, shade trees, drinking fountains, trash cans, and dog waste stations.
- Utilities for electrical power, water conveyance, sewage, and drainage.

Per data provided by the District, 20 joint-use facilities totaling 69.09 acres would be constructed under the Proposed Program. The joint-use facilities developed under this project category may be used for organized sports activities. The size of each joint-use field would dictate the type of organized sports activity. Each field can range in size, but would typically be suitable for junior soccer league play and practice for ages 11 and younger, as well as a variety of other sports. In addition, any new pools constructed under this category would typically be up to 50 meters by 25 yards, but may be smaller depending on the need.

A joint-use agreement that specifies details of the use—such as the hours of operation, types of activities/sports allowed, how the gates would be locked if a custodian is not available, and maintenance details—can be executed between the District and the City's Parks and Recreation Department. Generally, these agreements stipulate that the District would have exclusive use of the joint-use facilities from 30 minutes before each school campus opens until 30 minutes after the school's dismissal bell on Monday through Friday while school is in session. The community would have use of the fields 30 minutes after school until 30 minutes before school, Monday through Thursday, and 30 minutes after school on Friday until 30 minutes before school on Monday. The

agreements are typically for 25 years. The City is typically responsible for maintenance of all facilities within the joint-use area. For natural turf joint-use fields, the City's Parks and Recreation Department would be responsible for the provision of water to the site. The Parks and Recreation Department is applying new watering methods to irrigate responsibly within San Diego's various climate zones and is prioritizing water use on athletic fields such as joint-use areas (City of San Diego 2020). According to the current San Diego Municipal Code (Section 67.3804(g)), the Parks and Recreation Department is exempt from watering time restrictions; however, it must comply with targeted water-use restrictions, including reductions of overall water use. Active recreational turf areas are currently irrigated three times per week (City of San Diego 2020).

Construction activities associated with installation of fields, walking tracks, parking, or other recreational facilities would generally involve minimal ground disturbance and light equipment. Construction of pools would require deep excavation and other ground disturbance for associated facilities using heavy equipment. The construction period would typically last less than a year. Operation of joint-use facilities would not increase student enrollment capacity but would increase the frequency of use of these facilities by the community consistent with the stipulations in the joint-use agreements as described above.

## Near-Term, Site-Specific Whole Site Modernization Projects

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 existing school sites, as shown in Table ES-1. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the Whole Site Modernization project category.

**Table ES-1. Near-Term Site-Specific Whole-Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Elementary School | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Elementary School | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |

| School | Location |
|---|---|
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019

## San Diego Unified School District CEQA Handbook

The Proposed Program also involves preparation of a *San Diego Unified School District CEQA Handbook* to guide District staff through the CEQA process. Largely informed by the results of the analyses contained in this PEIR as well as the District's experience on previous projects, the CEQA Handbook has been prepared with the intent of assisting the District's Facilities Planning and Construction (FPC) Division, their construction contractors, and other parties working with the District during implementation of the Capital Improvement Program as well as other projects that do not fall under the Capital Improvement Program. The CEQA Handbook outlines the requirements of CEQA, including the process for tiering future CEQA analyses off this PEIR, and identifies screening criteria for being able to narrow or eliminate potential issues. Generally, the CEQA Handbook is designed to:

- Ensure the consistency, accuracy, and completeness of environmental documents prepared by the District and/or its consultants.
- Streamline CEQA review of future projects by establishing a uniform, consistent approach for the District's environmental review process.

The CEQA Handbook is intended to give staff and consultants preparing environmental documents a consistent analysis approach by providing relevant background information; applicable rules and regulations; consistent methodology, screening, and significance criteria; and potential mitigation measures.

A draft of the CEQA Handbook is provided in Appendix A of this PEIR.

# Areas of Known Controversy/Issues Raised by Agencies and the Public

Section 15123 of the State CEQA Guidelines requires the summary of a PEIR to include areas of controversy known to the Lead Agency, including issues raised by agencies and the public. The District circulated a Notice of Preparation (NOP) to solicit agency and public comments on the scope and content of the environmental analysis beginning on March 22, 2019, and ending on April 22, 2019 (Appendix B).

The District received three NOP response letters from the State Clearing House (SCH), the Native American Heritage Commission (NAHC), and the City of San Diego during the review period. The SCH letter provides SCH # 2019039131 and notes which state agencies received a copy of the NOP. The NAHC letter notes the District's responsibility to comply with Assembly Bill (AB) 52 as it relates to tribal consultation requirements. The City of San Diego letter provides comments related to the project description, hydrology and water quality analysis, flood plain management, utilities and service systems, stormwater drainage, and transportation impact analysis. The District has reviewed

these letters and has considered relevant content as the PEIR process progressed. The NOP comment letters are included in Appendix B of this PEIR.

# Issues to Be Resolved

## Summary of Project Impacts

This Draft PEIR examines the potential environmental effects of the proposed project, including information related to existing site conditions, analyses of the types and magnitude of individual and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts. In accordance with Appendix G of the State CEQA Guidelines, the potential environmental effects of the proposed project were analyzed for the following areas.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise and Vibration
- Paleontological Resources
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities
- Wildfire

Table ES-2, presented at the end of this chapter, provides a summary of the environmental impacts that could result from implementation of the proposed project and feasible mitigation measures that would reduce or avoid the impacts. For each impact, Table ES-2 identifies the significance of the impact before mitigation, applicable mitigation measures, and the level of significance of the impact after the implementation of the mitigation measures. Impacts on agriculture and forestry resources, land use and planning, mineral resources, population and housing, and public services are considered to be "Effects Found Not to be Significant," in accordance with Section 15128 of the State CEQA Guidelines. These issues are discussed further in Chapter 6, *Additional Considerations.*

## Summary of Project Alternatives

The following alternatives are analyzed in detail in Chapter 7 of this Draft PEIR. The objective of the alternatives analysis is to consider a reasonable range of potentially feasible alternatives to foster informed decision-making and public participation. The alternatives to the Proposed Program are summarized below.

### Alternative 1: No Project Alternative

As discussed above, per State CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative analyzed in this PEIR would involve the implementation of Vision 2020, the Long-Range Facilities Master Plan, and improvements for school facilities that were identified under Propositions S and Z, and Measure YY. Propositions S and Z identify specific projects that are authorized to be completed at each individual school site. Propositions S and Z, and Measure YY authorizes the following projects to be completed at each or any of the District's school sites, including child development

centers and other District facilities as detailed in Section 3.2.2.3 of Chapter 3, *Project Description*. Under this alternative, improvements detailed in Table 3-1 of Chapter 3 for the New Acquisition and New School or Administrative Facilities, Whole Site Modernization, Upgrades of Existing School and Administrative Sites, and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories would occur. However, the Capital Improvement Program and the *San Diego Unified School District CEQA Handbook* would not be established or implemented as part of Alternative 1. This means the improvements to schools and administrative facilities, and joint-use facilities development would occur consistent with the District's current practice of conducting separate CEQA analyses of every proposed capital improvement project at each school. The District would not develop a set of CEQA guidelines and screening criteria for the project categories that fall under the Capital Improvement Program that would streamline the District's CEQA process under this alternative.

## Alternative 2: No New Site Acquisition and New School or Administrative Facilities Alternative

Under Alternative 2, the District would not acquire any new sites and would not construct any new school or administrative facilities. Any new growth in student population within the Program area would need to be accommodated at existing District facilities. All other improvements related to the Proposed Program as defined in Chapter 3 would occur. Substantial renovation of existing District sites could still occur under the Whole Site Modernization project category as well as the construction of joint-use facilities at existing District properties. In addition, activities associated with the Upgrades of Existing School and Administrative Sites project category would occur, including modernization of buildings, maintenance and replacement of aging infrastructure, technology upgrades, addition or upgrades of HVAC systems, etc.

## Alternative 3: Only Whole Site Modernization and Upgrades of Existing School and Administrative Sites Alternative

Under Alternative 3, the Proposed Program would only include the Upgrades of Existing School and Administrative Sites and portions of the Whole Site Modernization project categories. Because this alternative would not include the acquisition of new sites and construction of new schools, any new growth in student population within the Program area would need to be accommodated at existing District facilities. Under this alternative, the whole site modernization projects would only include renovations or upgrades of existing buildings and would not involve major grading or ground disturbance. No new permanent classrooms would be constructed, and, therefore, modular, relocatable, or portable classrooms would remain at District sites and would continue to be used for additional classroom space. HVAC system upgrades would occur and reconfigurations of existing athletic facilities or of existing driveways, drop-off zones, bus loading areas, and parking lots could also occur. The New Site Acquisition and New School or Administrative Facilities and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories would not be implemented.

Whole site modernization projects would include all of the components described in Chapter 3, including:

- Reconstruction of existing library/media centers, performing arts buildings, theaters, and auditoriums.

- Improvements to athletic facilities, such as new PA systems, electronic scoreboards, locker room improvements, installation of artificial turf fields to replace existing athletic facilities or the reconfiguration of existing athletic facilities, as well as the development of field use policies for school and third-party use of both existing and improved athletic facilities.
- Demolition of modular classrooms and staging of modular classrooms for other District sites.
- Reconfiguration of existing restrooms.

Upgrades of existing school and administrative sites would include all of the components described in Chapter 3, including:

- Construction of new, or reconfiguration of existing, driveways, drop-off zones, bus loading areas, and parking lots for improved safety and circulation of vehicles and pedestrians.
- Construction of new, or reconfiguration of existing, ADA pathway, ramp, and elevator improvements.
- Construction of new, or reconfiguration of existing, hardscape and landscape areas.
- Modernization and renovation of school facilities to comply with Title IX gender equity requirements.
- Improvements to visual and performing arts, physical education, athletic, and science education facilities.
- Replacement of fire alarms, emergency communication systems, security fencing, and various site security improvements.
- Technology upgrades, such as wired and wireless infrastructure and equipment upgrades.
- Improvements to the seismic structural integrity of school buildings.
- HVAC system upgrades or additions.
- Installation of solar panels and other energy efficiency upgrades.
- Utility upgrades, such as electrical, water, sewer, and storm drains.
- Other interior finishes such as the provision of new classroom furniture, interior and exterior painting and repairs, and the reconfiguration of existing classroom spaces.
- Wall, pole, or ground mounted marquee sign or other wayfinding monuments

**Table ES-2. Project Impacts and Mitigation Measures**

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| **4.1 Aesthetics** | | | | |
| *Create a substantial adverse effect on a scenic vista*. | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction*:<br>**Impact-AES-1: Potential to Result in Adverse Effects on Views within a Vista Area During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities, including large areas of graded land or the presence of large construction equipment such as cranes or scaffolding for multiple years within a scenic vista, could result in a temporary substantial adverse impact on a scenic vista. This is a potentially significant impact. | Potentially Significant | **MM-AES-1: Install Construction Screening and Fencing.** In compliance with District Guide Specification Section 01-50-00, Temporary Facilities and Controls, the District shall install construction-screening fencing around the entire perimeter of a project site during construction of a new school, administrative facility, or a whole site modernization that would shield construction activities from sight and, prior to the onset of construction activities, the District shall confirm such fencing is depicted on the appropriate demolition and construction plans. Construction screening shall meet the specifications defined in Part 2 of Section 01-50-00. | *Construction*: Significant and Unavoidable |
| | *Operation*:<br>**Impact-AES-2: Potential to Result in Adverse Effects on Views within a Vista Area During Operation of New School or Administration Facilities.** Development of new school or administrative facilities could introduce structures within a designated scenic vista that result in substantial interference with or blockage of a designated scenic vista. This is a potentially significant impact. | Potentially Significant | **MM-AES-2: Minimize Intrusions into the Viewshed from New School or Administrative Facilities.** Prior to the preparation of a site plan and building design for a new school or administrative facility, the District shall determine if the site falls within the viewshed of a scenic vista designated in the City of San Diego community plans or any other plan applicable to the project site. If the site falls within a designated scenic vista, the District shall use site planning and building design to minimize the development's prominence within the viewshed to the greatest extent feasible. Measures could include, but are not limited to, the following:<br>• Position highly visible features that have the potential to block or detract from the scenic vista | *Operation*: Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | | | (e.g., taller or larger buildings, parking lots) out of, or orient that component in such a way as to minimize their prominence within, the viewshed.<br>• If possible, place heating, ventilation and air conditioning ( HVAC) equipment on the ground and/or shield it with equipment sheds/roof screens.<br>• Choose finishing materials for buildings or other site components, such as HVAC equipment sheds/roof screens or fencing, including paint colors, that blend with and do not detract from the surrounding structures or natural vegetation.<br>• Use landscaping elements to minimize the visual prominence of project components within the viewshed.<br>The District shall consider the site plan and building design as well as any residual impacts prior to approval of any specific project. | |
| Whole Site Modernization | *Construction*:<br>**Impact-AES-3: Potential to Result in Adverse Effects on Views within a Vista Area During Construction of Whole Site Modernizations.** Construction activities associated with whole site modernization projects, including large areas of graded land or the presence of large construction equipment such as cranes or scaffolding, could result in a temporary substantial adverse impact on a scenic vista. This is a potentially significant impact. | Potentially Significant | Implement **MM-AES-1**, as described above. | *Construction*: Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | *Operation*:<br>**Impact-AES-4: Potential to Result in Adverse Effects on Views within a Vista Area During Operation of Existing District Sites and Facilities.** Redevelopment or renovation of existing structures associated with whole site modernization projects, upgrades of existing school and administrative sites, or new development associated with joint-use facilities could result in substantial interference with or blockage of a designated scenic vista. This is a potentially significant impact. | | **MM-AES-3: Prepare Visual Simulations to Evaluate the Project's Potential to Affect Scenic Vistas and Minimize Intrusions into the Viewshed at Existing District Facilities.** If subsequent projects occurring under implementation of the Proposed Program at existing District sites or facilities are identified on Table 4.1-2 as falling within the viewshed of a scenic vista designated in the City of San Diego community plans and would involve an overall increase in building height or massing as part of the improvements (including the addition of rooftop features), the District shall conduct a site survey to determine the prominence of the site and its existing structures within the context of the designated scenic vista, taking into consideration the topography and intervening obstructions (other buildings, vegetation, etc.,). If the results of the visual site survey conclude the potential for improvements to intrude into or potentially block a scenic vista, the District shall prepare visual simulations during subsequent CEQA evaluations to analyze the potential for any project components to intrude into the viewshed of a designated scenic vista. If a potential impact on a scenic vista is determined to occur, the District shall minimize the impact to the greatest extent feasible. Measures could include, but are not limited to, the following:<br>• Consider scenic vistas during any reconfigurations to an existing campus layout and position highly visible features that have the potential to block or detract from the scenic vista (e.g., taller or larger buildings, parking lots) out of, or orient that component in such a way as to minimize their prominence within, the viewshed. | *Operation*:<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | | | • When possible, place heating, ventilation, and air conditioning (HVAC) equipment on the rooftop of single-story buildings or on the ground.<br>• Choose finishing materials for buildings or other site components, such as HVAC equipment or fencing, including paint colors, that blend with and do not detract from the surrounding structures or natural vegetation.<br>• Consider the use of landscaping elements to soften the visual prominence of project components within the viewshed.<br>The District shall consider these factors as well as any residual impacts prior to approval of any specific project. | |
| Upgrades of Existing School and Administrative Sites | *Construction*:<br>Construction activities associated with upgrades to existing school sites would not result in substantial adverse impacts on a designated scenic vista. | Less than Significant | No mitigation is required. | *Construction*:<br>Not Applicable |
| | *Operation:*<br>**Impact-AES-4,** as described above. | Potentially Significant | Implement **MM-AES-3**, as described above. | *Operation*:<br>Significant and Unavoidable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>Construction activities associated with joint-use facilities would not result in substantial adverse impacts on a designated scenic vista. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>**Impact-AES-4,** as described above. | Potentially Significant | Implement **MM-AES-3**, as described above. | *Operation:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:* Construction activities associated with the site-specific projects would not result in substantial adverse impacts on a designated scenic vista. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with site-specific projects would not result in substantial adverse impacts on a designated scenic vista. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| *Damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway.* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:* **Impact-AES-5: Potential to Damage Scenic Resources within an Eligible or Officially Designated State Scenic Highway During New Construction.** Construction activities associated with new acquisition and new school or administrative facilities have the potential to remove or damage scenic resources, including historic buildings, trees, or rock outcroppings, within a state scenic highway. This is a potentially significant impact. | Potentially Significant | **MM-AES-4: Preserve Scenic Resources.** During the project planning phases, the District shall review Caltrans' State Scenic Highway Program to determine if the project site falls within an officially designated state scenic highway. If the project site falls outside an officially designated scenic highway, no further action is required. If the project site falls within an officially designated scenic highway the following steps shall be implemented:<br>• If the project site is within a state scenic highway, the District shall avoid damaging, moving, or removing trees, rock outcroppings, historic structures, and other scenic resources from eligible or designated state scenic highway corridors and local scenic resources where those scenic resources are relevant to the designation or eligibility for designation as a state scenic highway or are identified as a protected visual resource in local plans.<br>• For projects within or adjacent to a designated or eligible state scenic highway corridor, prior to project approval, the District shall complete design studies identifying site-specific mitigation measures, and during project construction shall | *Construction:* Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | | | implement such mitigation measures to reduce impacts on the quality of the views or visual experience that originally qualified the highway for scenic designation and project status of local resources in approved plans.<br>The District shall review any design studies and site-specific mitigation measures prior to approval of the project and determine the residual level of significance. | |
| | *Operation:*<br>Operation of a new school or administrative building would not result in damage to or removal of any scenic resources. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Whole Site Modernization | *Construction:*<br>**Impact-AES-6: Potential to Damage Scenic Resources within an Eligible or Officially Designated State Scenic Highway.** Construction activities associated with whole site modernization and joint-use facilities development including fields, pools, and the Play All Day program have the potential to remove or damage scenic resources, including historic buildings, trees, or rock outcroppings, within a state scenic highway. This is a potentially significant impact. | Potentially Significant | Implement **MM-AES-4**, as described above. | *Construction:*<br>Significant and Unavoidable |
| | *Operation:*<br>Operation of a whole site modernization sites would not result in damage to or removal of any scenic resources. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| Upgrades of Existing School and Administrative Sites | *Construction and Operation:* Construction and operation associated with upgrades to existing school sites would not result in substantial adverse impacts on scenic resources within a state scenic highway. | Less than Significant | No mitigation is required. | *Construction and Operation:* Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:* **Impact-AES-6,** as described above. | Potentially Significant | Implement **MM-AES-4,** as described above. | *Construction:* Significant and Unavoidable |
| | *Operation:* Operation associated with Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program would not result in substantial adverse impacts on scenic resources within a state scenic highway. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:* Construction activities associated with the site-specific projects would not result in damage or removal of any scenic resources. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with site-specific projects would not result in damage or removal of any scenic resources. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| *Degrade the existing visual character or quality of public views of the site and its surroundings.* | | | | |
| New Acquisition and New School or | *Construction:* **Impact-AES-7: Degradation of Visual Character and Quality During Construction.** Construction | Potentially Significant | Implement **MM-AES-1**, as described above. | *Construction:* Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| Administrative Facilities | activities associated with new school or administrative facilities have the potential to result in the degradation of the visual character and quality at the project site. This is a potentially significant impact. | | | |
| | *Operation:* Impacts on visual character and quality related to operation of a new school or administrative facility would be less than significant. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Whole Site Modernization | *Construction and Operation:* Construction and operation of whole site modernization sites would not have the potential to result in the degradation of the visual character and quality at the project site. | Less than Significant | No mitigation is required. | *Construction and Operation:* Not Applicable |
| Upgrades of Existing School and Administrative Sites | *Construction and Operation:* Construction and operation of upgrades to existing school sites would not have the potential to result in the degradation of the visual character and quality at the project site. | Less than Significant | No mitigation is required. | *Construction and Operation:* Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction and Operation:* Construction and operation of joint-use facilities development including fields, pools, and Play All Day programs would not have the potential to result in the degradation of the visual character and quality at the project site. | Less than Significant | No mitigation is required. | *Construction and Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction and Operation:*<br>Construction and operation of the site-specific projects would not result in impacts on visual character or quality. | Less than Significant | No mitigation is required. | *Construction and Operation:*<br>Not Applicable |
| *Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.* | | | | |
| New Acquisition and New School or Administrative | *Construction:*<br>Construction associated with a new school or administrative facility would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>**Impact-AES-8: Substantial Increase of Nighttime Lighting.** Operation of a new school, particularly new high schools with athletic fields, have the potential to result in a substantial increase of nighttime lighting caused by the addition of athletic field lighting for nighttime outdoor athletic activities (e.g., football or baseball games). This is a potentially significant impact. | Potentially Significant | **MM-AES-5: Conduct a Lighting Analysis and Minimize Impacts on Nearby Residences.** During subsequent CEQA evaluations for new school or administrative facilities or whole site modernizations that would involve installation of new, or replacement of, athletic field lighting, the District shall conduct a lighting analysis that analyzes sky glow, light trespass, and glare using the standards developed by the Institution of Lighting Engineers, the Illuminating Engineering Society of North America, and the Electric Power Research Institute to determine if illuminance produced by the project would be significant. If found to be significant, the District shall minimize light trespass, to the extent feasible. Measures to reduce light trespass could include, but are not limited to, the following:<br>• Locate new sources of lighting as far from nearby residences as possible.<br>• Use fencing and vegetation to soften the intensity of lighting on nearby residences. | *Operation:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | | | • Install LED lighting standards that feature downward-facing luminaires with reflectors and visors to focus light at the field to reduce the amount of upward or trespass light.<br>• Mount lights at heights that produce narrow beam angles.<br>The District shall consider the lighting analysis and proposed measures to reduce light trespass and determine the residual level of significance prior to approval of any specific project under this Program. | |
| Whole Site Modernization | *Construction:*<br>Construction associated with whole site modernization sites would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operation associated with whole site modernization projects would not include installation of new athletic field lighting or other activities that could result in a substantial increase in nighttime lighting or glare. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Upgrades of Existing School and Administrative Sites | *Construction:*<br>Construction associated with upgrades of existing school sites would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. | Less than Significant | No mitigation is required. | *Construction*<br>Not Applicable |
| | *Operation:*<br>Operation associated with upgrades of existing school sites would not | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | include installation of athletic field lighting or other activities that could result in a substantial increase in nighttime lighting or glare. | | | |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:* Construction associated with of joint-use facilities development including fields, pools, and Play All Day programs would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with of joint-use facilities development including fields, pools, and Play All Day programs would not include installation of athletic field lighting or other activities that could result in a substantial increase in nighttime lighting or glare. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:* Construction activities associated with the site-specific projects would not produce substantial new sources of glare. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with site-specific projects would not produce substantial new sources of glare. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| **4.2 Air Quality** | | | | |
| *Conflict with applicable air quality plan.* | | | | |
| All project categories and Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:* Construction activities associated with all project categories would not conflict with or obstruct implementation of the applicable air quality plan. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with all project categories would not conflict with or obstruct implementation of the applicable air quality plan. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard.* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:* **Impact-AQ-1: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction.** Construction activities associated with new acquisition and new school or administrative facilities that exceed the screening criteria presented in Table 4.2-7 could result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain | Potentially Significant | **MM-AQ-1: Require Alternatively Fueled or Implement Newer Engines on Construction Equipment**. Projects that do not meet the District-specific construction screening criteria identified in Table 4.2-7, and are found to result in emissions exceeding the thresholds presented in Table 4.2-5, shall require contractors, as a condition of contract, to further reduce construction-related exhaust emissions by ensuring that all off-road equipment greater than 50 horsepower and operating for more than 20 total hours over the entire duration of construction activities shall be alternatively fueled (e.g., propane, electric) or operate engines based on the schedule below:<br>• First 5 years of program implementation: Tier 3 Final or newer engines<br>• 5+ years of program implementation: Tier 4 Final or newer engines | *Construction:* Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality. | | Exemptions can be made for specialized equipment where Tier 4 engines are not commercially available within 200 miles of the project site. The construction contractor must identify these pieces of equipment, document their unavailability, and ensure that they operate on no less than a U.S. Environmental Protection Agency-approved Tier 4 engine after 5 years of program implementation. The District's CEQA Civil/Environmental Coordinator shall evaluate the contractor's submission to determine the lack of availability of necessary equipment within the 200-mile range of the project site.<br><br>**MM-AQ-2: Require Construction Fleet to Use Renewable Diesel.** Projects that do not meet the District-specific construction screening criteria identified in Table 4.2-7, and are found to result in emissions exceeding the thresholds presented in Table 4.2-5 shall require their contractors, as a condition of contract, to reduce construction-related exhaust emissions by ensuring that all off-road equipment greater than 50 horsepower and operating for more than 20 total hours over the entire duration of construction activities shall operate on renewable diesel (such as high-performance renewable diesel). Renewable diesel is currently commercially available in the San Diego area. The contractor will submit evidence of the use of low-VOC coatings to the District prior to the start of construction.<br><br>**MM-AQ-3: Require Low-Volatile Organic Compound Coatings during Construction**. Projects that do not meet the District-specific construction screening criteria identified in Table 4.2-7, and are found to result in volatile organic compound (VOC) | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | | | emissions exceeding the thresholds presented in Table 4.2-5 shall require their contractors, as a condition of contract, to reduce construction-related fugitive VOC emissions by ensuring that low-VOC coatings that have a VOC content of 75 grams per liter or less are used during construction. The project applicant will submit evidence of the use of low-VOC coatings to the District prior to the start of construction. | |
| | *Operation:*<br>Operation activities associated with new acquisition and new school or administrative facilities are not anticipated to exceed the screening criteria presented in Table 4.2-8. Therefore, operational impacts would be less than significant. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Whole Site Modernization | *Construction:*<br>**Impact-AQ-2: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of Whole Site Modernization Projects.**<br>Construction activities associated with Whole Site Modernization projects that exceed the screening criteria presented in Table 4.2-7 could result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air | Potentially Significant | Implement **MM-AQ-1 through MM-AQ-3**, as described above. | *Construction:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality. | | | |
| | *Operation:*<br>Operation activities associated with whole site modernization projects are not anticipated to exceed the screening criteria presented in Table 4.2-8. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Upgrades of Existing School and Administrative Sites | *Construction:*<br>**Impact-AQ-3: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of Upgrades of Existing School and Administrative Sites**. Construction activities associated upgrades of existing school and administrative sites that exceed the screening criteria presented in Table 4.2-7 could result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects, which would | Potentially Significant | Implement **MM-AQ-1** through **MM-AQ-3**, as described above. | *Construction:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | result in a potentially significant impact on air quality. | | | |
| | *Operation:*<br>Operation activities associated with upgrades of existing school sites projects are not anticipated to exceed the screening criteria presented in Table 4.2-8. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact-AQ-4: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of Joint-Use Facilities**. Construction activities associated with joint-use facilities that exceed the screening criteria presented in Table 4.2-9 could result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality. | Potentially Significant | Implement **MM-AQ-1 through MM-AQ-3**, as described above. | *Construction:*<br>Significant and Unavoidable |
| | *Operation:*<br>**Impact-AQ-5: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which** | Potentially Significant | **MM-AQ-4: Require Electrical Landscaping Equipment.** The District shall coordinate with the City of San Diego to promote and require use of electrical landscaping equipment. | *Operation:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | **the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Operation of Joint-Use Facilities.** Operational activities associated with joint-use facilities that exceed the screening criteria presented in Table 4.2-10 could result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality. | | **MM-AQ-5: Require Green Consumer Products.** The District shall promote and require the use of green products. Examples of green products may include low-volatile organic compound architectural coatings (75 grams per liter) and cleaning supplies, as well as alternatively fueled landscaping equipment. | |
| Proposed Program Buildout | *Construction:* **Impact-AQ-6: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction.** Construction activities associated Proposed Program Buildout that exceed the screening criteria presented in Tables 4.2-7 and 4.2-9 could result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in | Potentially Significant | Implement **MM-AQ-1** through **MM-AQ-3**, as described above. | *Construction:* Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | the SDAB, which at certain concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality. | | | |
| | *Operation:*<br>**Impact-AQ-7: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Operation.** Operational activities associated with the Proposed Program Buildout (4.2-12) would result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in the SDAB, which at certain concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality. | Potentially Significant | Implement **MM-AQ-4** and **MM-AQ-5**, as described above. | *Operation:*<br>Significant and Unavoidable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>**Impact-AQ-2**, as described above. | Potentially Significant | Implement **MM-AQ-1** through **MM-AQ-3**, as described above. | *Construction:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | *Operation:*<br>Operation activities associated with near-term, site-specific whole site modernization projects are not anticipated to exceed the screening criteria presented in Table 4.2-8. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| *Expose sensitive receptors to substantial pollutant concentrations.* | | | | |
| New Acquisition and New School or Administrative Facilities, Whole Site Modernization, and Upgrades of Existing School and Administrative Sites | *Construction:*<br>**Impact-AQ-8: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of New School and Administrative Facilities**, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites. Construction activities associated with new school and administrative facilities, whole site modernizations, and upgrades of existing school and administrative sites could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects. | Potentially Significant | For **Impact-AQ-8**:<br>Implement **MM-AQ-1** through **MM-AQ-5**, as described above.<br><br>For **Impact-AQ-9:**<br>Implement **MM-AQ-1** and **MM-AQ-2**, as described above. | *Construction:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | **Impact-AQ-9: Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites**. Construction activities associated with new school and administrative facilities, whole site modernizations, and upgrades of existing school and administrative sites that do not meet the screening criteria presented in Tables 4.2-13 and 4.2-14 could result in Toxic Air Contaminant (TAC) emissions that exceed health risk thresholds. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.<br>Additional emissions generated by new stationary sources and vehicle trips could expose receptors to cancer and non-cancer risks in excess of thresholds per San Diego Air Pollution Control District (SDAPCD) Rule 1200. However, as described above, the Public Resources Code would ensure that receptors at existing schools are not exposed to significant health risks from TAC emissions of new | | | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | stationary sources. In addition, the Public Resources Code would ensure receptors at new schools would not be exposed to increased emissions from mobile sources from major roadways. The Proposed Program would also reduce per student vehicle miles traveled (VMT) compared to current conditions. | | | |
| | *Operation:*<br>**Impact-AQ-10: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites.** Operational activities associated with new school and administrative facilities, whole site modernizations, and upgrades of existing school and administrative sites could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects. | Potentially Significant | Implement **MM-AQ-1** through **MM-AQ-5**, as described above. | *Operation:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction*:<br>**Impact-AQ-11: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of Joint-Use Facilities**. Construction and operational activities associated with joint-use facilities could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.<br><br>**Impact-AQ-12: Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of Joint-Use Facilities**. Construction activities associated with joint-use facilities that do not meet the screening criteria presented in Tables 4.2-13 and 4.2-14 could result in Toxic Air Contaminant (TAC) emissions that exceed health risk thresholds. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can | Potentially Significant | For **Impact-AQ-11:**<br>Implement **MM-AQ-1** through **MM-AQ-5**, as described above.<br><br>For **Impact-AQ-12**:<br>Implement **MM-AQ-1** and **MM-AQ-2**, as described above. | *Construction:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | contribute to short- and long-term human health effects.<br>Additional emissions generated by new stationary sources and vehicle trips could expose receptors to cancer and non-cancer risks in excess of thresholds per San Diego Air Pollution Control District (SDAPCD) Rule 1200. However, as described above, the Public Resources Code would ensure that receptors at existing schools are not exposed to significant health risks from TAC emissions of new stationary sources. In addition, the Public Resources Code would ensure receptors at new schools would not be exposed to increased emissions from mobile sources from major roadways. The Proposed Program would also reduce per student vehicle miles traveled (VMT) compared to current conditions (see Section 4.13, *Transportation*). | | | |
| | *Operation:*<br>**Impact-AQ-13: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of Joint-Use Facilities.** Operational activities associated with joint-use facilities could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria | Potentially Significant | Implement **MM-AQ-1** through **MM-AQ-5**, as described above. | *Operation:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects. | | | |
| Proposed Program Buildout | *Construction:*<br>**Impact-AQ-14: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of Buildout of the Proposed Program.** Construction activities associated with the Proposed Program (e.g., new school and administrative facilities, whole site modernizations, upgrades of existing school and administrative sites, joint-use facilities) could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.<br><br>**Impact-AQ-15: Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of Buildout of** | Potentially Significant | For **Impact-AQ-14:**<br>Implement **MM-AQ-1** through **MM-AQ-5.**<br><br>For **Impact-AQ-15**:<br>Implement **MM-AQ-1** and **MM-AQ-2.** | *Construction:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | **the Proposed Program.** Construction activities associated with the Proposed Program (e.g., new school and administrative facilities, whole site modernizations, upgrades of existing school and administrative sites, joint-use facilities) that do not meet the screening criteria presented in Tables 4.2-13 and 4.2-14 could result in Toxic Air Contaminant (TAC) emissions that exceed health risk thresholds. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.<br>Additional emissions generated by new stationary sources and vehicle trips could expose receptors to cancer and non-cancer risks in excess of thresholds per San Diego Air Pollution Control District (SDAPCD) Rule 1200. However, as described above, the Public Resources Code would ensure that receptors at existing schools are not exposed to significant health risks from TAC emissions of new stationary sources. In addition, the Public Resources Code would ensure receptors at new schools would not be exposed to increased emissions from mobile sources from major | | | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | roadways. The Proposed Program would also reduce per student vehicle miles traveled (VMT) compared to current conditions. | | | |
| | *Operation:*<br>**Impact-AQ-16: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of Buildout of the Proposed Program.** Operational activities associated with the Proposed Program (e.g., new school and administrative facilities, whole site modernizations, upgrades of existing school and administrative sites, joint-use facilities) could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects. | Potentially Significant | Implement **MM-AQ-1** through **MM-AQ-5.** | *Operation:*<br>Significant and Unavoidable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>**Impact-AQ-17: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of Near-Term, Site-Specific Whole Site Modernization Projects.** Construction and | Potentially Significant | For **Impact-AQ-17:**<br>Implement **MM-AQ-1** through **MM-AQ-5**, as described above.<br><br>For **Impact-AQ-18:**<br>Implement **MM-AQ-1** and **MM-AQ-2,** as described above**.** | *Construction:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | operational activities associated with the near-term, site-specific whole site modernization projects could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.<br><br>**Impact-AQ-18: Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of Near-Term, Site-Specific Whole Site Modernization Projects.** Construction activities associated with the near-term, site-specific whole site modernization projects that do not meet the screening criteria presented in Table 4.2-13 could result in Toxic Air Contaminant (TAC) emissions that exceed health risk thresholds. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects. | | | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | Additional emissions generated by new stationary sources and vehicle trips could expose receptors to cancer and non-cancer risks in excess of thresholds per San Diego Air Pollution Control District (SDAPCD) Rule 1200. However, as described above, the Public Resources Code would ensure that receptors at existing schools are not exposed to significant health risks from TAC emissions of new stationary sources. In addition, the Public Resources Code would ensure receptors at new schools would not be exposed to increased emissions from mobile sources from major roadways. The Proposed Program would also reduce per student vehicle miles traveled (VMT) compared to current conditions. Thus, these impacts would be less than significant | | | |
| | *Operation:*<br>**Impact-AQ-19: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of Near-Term, Site-Specific Whole Site Modernization Projects.** Operational activities associated with the near-term, site-specific whole site modernization projects could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive | Potentially Significant | Implement **MM-AQ-1** through **MM-AQ-5,** as described above. | *Operation:*<br>*Significant and Unavoidable* |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects. | | | |
| *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?* | | | | |
| New Acquisition and New School or Administrative Facilities Construction | *Construction:* Construction activities associated with new acquisition and new school or administrative facilities would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, with mandatory compliance with SDAPCD Rule 51. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* **Impact-AQ-20: Potential to Result in Other Emissions (Such as Those Leading to Odors) Adversely Affecting a Substantial Number of People During Operation.** Operational activities associated with new acquisition and new school or administrative facilities could result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. | Potentially Significant | **MM-AQ-6: Site New School Facilities Away from Odor-Generating Facilities.** The District shall prohibit new school construction within 1,000 feet of existing odor-generating facilities, consistent with the California Air Resources Board's *Air Quality Land Use Handbook,* which recommends siting sensitive receptors 1,000 feet away from emission sources. | *Operation:* Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Whole Site Modernization and Upgrades of Existing School and Administrative Sites | *Construction:* Construction activities associated with whole site modernization and upgrades of existing school and administrative facilities would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, with mandatory compliance with SDAPCD Rule 51. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operational activities associated with whole site modernization and upgrades of existing school and administrative facilities would not result in substantial odor impacts. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:* Construction activities associated with joint-use facilities would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, with mandatory compliance with SDAPCD Rule 51. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operational activities associated with joint-use facilities would not result in substantial odor impacts. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction and Operation:* Near-term, site-specific whole site modernization projects would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of | Less than Significant | No mitigation is required. | *Construction and Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | people, with mandatory compliance with SDAPCD Rule 51. Operational activities would not result in odor impacts as the types and intensity of activities would remain basically the same. | | | |
| **4.3 Biological Resources** | | | | |
| *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 CDFW or USFWS* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:*<br>**Impact-BIO-1: Potential to Have a Direct Substantial Adverse Effect on Any Sensitive Species During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could directly impact sensitive species by permanently removing suitable habitat on site. This is a potentially significant impact.<br><br>**Impact-BIO-2: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could | Potentially Significant | For **Impact-BIO-1:**<br>**MM-BIO-1**: **Prepare a Desktop Analysis.** During the project-specific design stage, the District shall retain a qualified biologist to perform a desktop analysis to determine the potential for site-specific biological resource impacts. The review shall include a 1-mile radius around the project site. As necessary, field visits will supplement desktop analysis.<br>If any project requires the removal of any trees or vegetation, in compliance with Migratory Bird Treaty Act, if a project requires the removal of any trees or vegetation, to the maximum extent possible, Proposed Program activity construction shall avoid the general avian breeding season (January 15 through August 31) near habitat that may contain sensitive species. If a project proposes construction involving ground disturbance, tree removal, or vegetation trimming or clearing during the nesting season in the vicinity of habitat with potential to support nesting birds, the District shall retain a qualified biologist to perform a nesting bird survey within the construction site. The survey shall be performed within 72 hours prior to project activities. If active nests are identified during the survey, the qualified biologist shall establish appropriate measures to avoid impacts on active nests, which | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.<br><br>**Impact-BIO-3: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could cause sediments and other construction materials to drain into adjacent native vegetation. In addition, noise from construction equipment could indirectly affect sensitive species within areas containing native vegetation. This is a potentially significant impact. | | may include a buffer around designated nests or other avoidance measures. The biologist shall monitor the nest, and the avoidance measures shall be in place until it has been determined the young have fledged or the nest has been abandoned.<br>**MM-BIO-2: Prepare a Biological Resources Technical Report.** If the desktop analysis and field visits prepared under **MM-BIO-1** identify sensitive species on a project site that would be directly or indirectly impacted, the biologist shall complete a biological resources technical report documenting biological findings and recommend project-specific mitigation measures. If the biological resources technical report identifies the need for specific mitigation measures, prior to construction, the District shall provide compensatory mitigation as necessary for direct impacts on any riparian or sensitive vegetation communities to be affected by construction of a specific project. Mitigation can be performed on site or off site, and may include passive or active habitat restoration or the purchasing of mitigation credits. All compensatory mitigation shall comply with all applicable local, regional, state, and federal plans, policies, and procedures, including CEQA compliance. In addition, the following measures shall be implemented, as applicable:<br>1. **Erect Environmentally Sensitive Area Fencing.** If sensitive species are identified as being present within the project site, prior to construction, a qualified biologist retained by the District shall delineate any areas identified as containing sensitive biological resources and install temporary environmentally sensitive area (ESA) fencing. Construction personnel shall avoid entering any area containing ESA fencing, | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | and the ESA fencing shall remain in place until the conclusion of construction.<br>2. **Limit Light Pollution**. If Proposed Program activities are proposed on a site in the vicinity of sensitive biological resources, the District shall protect the biological resources from light pollution though the use of light barriers, redirecting light sources, and the use of downward facing and low-level illumination as appropriate.<br>3. **Limit Noise Pollution**. To further reduce indirect noise impacts, projects in proximity to sensitive biological resources shall construct berms or walls adjacent to recreational areas and other areas that may introduce noises that could interfere with nearby wildlife.<br>4. **Conduct Gnatcatcher Surveys and Monitoring.** If potential nesting habitat for the coastal California gnatcatcher is identified on or adjacent to a project site, construction noise that exceeds the maximum allowable levels shall be avoided during the breeding season for the coastal California gnatcatcher (February 15–August 31). If construction is proposed during the breeding season for the species, U.S. Fish and Wildlife Service protocol surveys shall be required in order to determine species presence/absence. If protocol surveys are not conducted in suitable habitat during the breeding season for the aforementioned listed species, presence shall be assumed with implementation of noise attenuation and biological monitoring, as detailed below:<br>a. Prior to the commencement of the breeding season, a qualified biologist (possessing a | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | | | valid Endangered Species Act Section 10(a)(1)(a) recovery permit) shall survey those habitat areas that would be subject to construction noise levels exceeding 60 A-weighted decibels (dBA) hourly average for the presence of the coastal California gnatcatcher. Surveys shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of any construction. If gnatcatchers are present, then the following conditions must be met:<br>○ Between February 15 and August 31, no clearing, grubbing, or grading of occupied gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist. Construction activities may result in noise levels exceeding 60 dBA hourly average at the edge of occupied gnatcatcher habitat. The qualified biologist, District staff, and a qualified noise specialist shall collaborate to determine suitable measures at the site. This can include, but not be limited to, the following: limitations on the placement of construction equipment and the simultaneous use of equipment, active monitoring of the gnatcatcher by the qualified biologist, or noise attenuation measures. If these implemented measures are determined to be inadequate by the qualified biologist, then the associated construction activities shall cease until such time that adequate noise attenuation | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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is achieved or until the end of the breeding season (August 31).

b. If coastal California gnatcatcher is not detected during the protocol survey, the qualified biologist shall submit substantial evidence to District staff that demonstrates whether mitigation measures (described above) are necessary between February 15 and August 31 as follows:
   - If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site conditions, then conditions shall be adhered to as specified above.
   - If this evidence concludes that no impacts on this species are anticipated, no mitigation measures will be necessary.

5. **Consult With Resource Agencies.** Prior to construction and dependent on results of the project-specific biological resources technical report, if protected wetlands are identified on a project, the District shall consult with the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Wildlife to determine project impacts on protected wetlands and obtain permits, as necessary. Additional compensatory mitigation may be required, which would be identified by the resource agencies during the consultation process.
6. **Protect Vernal Pools During Construction.** If, during preparation of the project-specific biological resources technical report, it is determined that construction activities would occur within 250 feet of a vernal pool, the

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | District shall, prior to the start of construction, delineate the boundaries of vernal pool resources with clearly visible flagging or fencing. The flagging and/or fencing shall be maintained in place for the duration of construction. Flagged and fenced areas shall be avoided during construction activities in that area. A qualified biological monitor shall be present during all ground-disturbing and vegetation removal activities within 250 feet of vernal pools. Immediately prior to initial ground-disturbing activities and/or vegetation removal, the qualified biological monitor shall survey the site to ensure that fencing is installed and that construction crews are aware that vernal pool resources cannot be affected.<br>7. **Replace Vernal Pool Habitat.** If direct or indirect impacts on vernal pools cannot be avoided during construction, the District shall mitigate impacts on vernal pools through either purchasing from a vernal pool mitigation bank for preservation or creating additional vernal pool habitat. Direct impacts shall be mitigated at a 2:1 ratio. Indirect impacts shall be mitigated at 1:1 ration.<br><br>For **Impact-BIO-2:**<br>Implement **MM-BIO-1** and **MM-BIO-2**, as described above.<br><br>**MM-BIO-3: Comply With the City's Multi-Habitat Planning Area Adjacency Guidelines.** Prior to the commencement of construction, the District shall verify the contractor has accurately represented the project's design in construction documents and/or | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | contract specifications are in conformance with the City's Multi-Habitat Planning Area Adjacency Guidelines, specifically addressing the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/land development.<br><br>For **Impact-BIO-3:**<br>Implement **MM-BIO-1** and **MM-BIO-2**, as described above. | |
| | *Operation:*<br>**Impact-BIO-4: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Operation of New School or Administrative Facilities.** If a new school or administrative facility construction project installs new nighttime lighting (e.g., athletics field lights, security lights) or creates new temporary or permanent noise sources (e.g., construction equipment, new athletics events, public announcement system) adjacent to existing Multi-Habitat Planning Area land areas, new school or administrative facility construction could result in indirect operational impacts on sensitive species. This is a potentially significant impact.<br><br>**Impact-BIO-5: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During** | Potentially Significant | For **Impact-BIO-4**:<br>Implement **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3,** as described above.<br><br>For **Impact-BIO-5**:<br>Implement **MM-BIO-1** and **MM-BIO-2,** as described above. | *Operation:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | **Operation of New School or Administrative Facilities**. If a new school or administrative facility construction project installs new nighttime lighting (e.g., athletics field lights, security lights) or creates new temporary or permanent noise sources (e.g., new athletics events, public announcement system) adjacent to undisturbed native vegetation, new school or administrative facility construction projects could result in indirect operational impacts on sensitive species. This is a potentially significant impact. | | | |
| Whole Site Modernization | *Construction:*<br>**Impact-BIO-6: Potential to Have a Direct Substantial Adverse Effect on Any Sensitive Species During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could directly impact sensitive species by permanently removing suitable habitat on site. This is a potentially significant impact.<br><br>**Impact-BIO-7: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Whole Site Modernization** | Potentially Significant | For **Impact-BIO-6**:<br>Implement **MM-BIO-1** and **MM-BIO-2**, as described above.<br><br>For **Impact-BIO-7**:<br>Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3**, as described above.<br><br>For **Impact-BIO-8**:<br>Implement **MM-BIO-1** and **MM-BIO-2**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | **Projects.** For existing District properties indicated on Table 4.3-2, construction activities associated with whole site modernization projects could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.<br><br>**Impact-BIO-8: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of Whole Site Modernization Projects.** For existing District properties indicated on Table 4.3-3, construction activities associated with whole site modernization projects could cause sediments and other construction materials to drain into adjacent native vegetation. In addition, noise from construction equipment could indirectly affect sensitive species within areas containing native vegetation. This is a potentially significant impact. | | | |
| | *Operation:*<br>**Impact-BIO-9: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area** | Potentially Significant | For **Impact-BIO-9:**<br>Implement **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3**, as described above. | *Operation:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | **Lands During Operation of Whole Site Modernization Projects.** For an existing District properties indicated on Table 4.3-2, if a whole site modernization project creates new temporary or permanent noise sources (e.g., construction equipment, new athletics events, public announcement system) adjacent to existing Multi-Habitat Planning Area land areas, construction could result in indirect operational impacts on sensitive species. This is a potentially significant impact.<br><br>**Impact-BIO-10: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Operation of Whole Site Modernization Projects.** For an existing District properties indicated on Table 4.3-3, if a whole site modernization project creates new temporary or permanent noise sources (e.g., new athletics events, public announcement system) adjacent to undisturbed native vegetation, whole site modernization projects could result in indirect operational impacts on sensitive species. This is a potentially significant impact. | | For **Impact-BIO-10:**<br>Implement **MM-BIO-1** and **MM-BIO-2,** as described above. | |

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| Upgrades of Existing School and Administrative Sites | *Construction:*<br>**Impact-BIO-11: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities.** For existing District properties listed on Table 4.3-2, construction activities associated with upgrades of existing school and administrative sites or with joint-use facilities could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.<br><br>**Impact-BIO-12: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities.** For existing District properties listed on Table 4.3-3, construction activities associated with upgrades of existing school and administrative sites or with joint-use facilities could cause sediments and other construction materials to drain into adjacent native vegetation. In addition, noise from construction equipment could indirectly affect sensitive species within areas containing native | Potentially Significant | For **Impact-BIO-11**:<br>Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.<br><br>For **Impact-BIO-12**:<br>Implement **MM-BIO-1** and **MM-BIO-2**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | vegetation. This is a potentially significant impact. | | | |
| | *Operation:*<br>No operational activities during upgrades of existing sites would result in a substantial adverse effect, either directly or through habitat modifications, on any sensitive species. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact-BIO-11: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities.** For existing District properties listed on Table 4.3-2, construction activities associated with upgrades of existing school and administrative sites or with joint-use facilities could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.<br><br>**Impact-BIO-12: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of Upgrades of** | Potentially Significant | For **Impact-BIO-11**:<br>Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.<br><br>For **Impact-BIO-12**:<br>Implement **MM-BIO-1** and **MM-BIO-2**, as described above.<br><br>For **Impact-BIO-13**:<br>Implement **MM-BIO-1** and **MM-BIO-2**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | **Existing School and Administrative Sites or Joint-Use Facilities.** For existing District properties listed on Table 4.3-3, construction activities associated with upgrades of existing school and administrative sites or with joint-use facilities could cause sediments and other construction materials to drain into adjacent native vegetation. In addition, noise from construction equipment could indirectly affect sensitive species within areas containing native vegetation. This is a potentially significant impact.<br><br>**Impact-BIO-13: Potential to Have a Direct Substantial Adverse Effect on Any Sensitive Species During Construction of Joint-Use Facilities.** Construction activities associated with joint-use facilities could directly impact sensitive species by permanently removing suitable habitat on site. This is a potentially significant impact. | | | |
| | *Operation:*<br>**Impact-BIO-14: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Operation of Joint-Use Facility Projects.** For existing District properties indicated on Table 4.3-2, if a joint-use facility project creates new temporary or | Potentially Significant | For **Impact-BIO-14:**<br>Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3**, as described above.<br><br>For **Impact-BIO-15:**<br>Implement **MM-BIO-1** and **MM-BIO-2,** as described above. | *Operation:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | permanent noise sources (e.g., new athletics events, public announcement system) adjacent to existing Multi-Habitat Planning Area land areas, joint-use facilities could result in indirect operational impacts on sensitive species. This is a potentially significant impact.<br><br>**Impact-BIO-15: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Operation of Joint-Use Facility Projects.** For existing District properties indicated on Table 4.3-3, if a joint-use project creates new temporary or permanent noise sources (e.g., new athletics events, public announcement system) adjacent to undisturbed native vegetation, joint-use facilities could result in indirect operational impacts on sensitive species. | | | |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>**Impact-BIO-6**, **Impact-BIO-7**, and **Impact-BIO-8**, as described above. | Potentially Significant | For **Impact-BIO-6**:<br>Implement **MM-BIO-1** and **MM-BIO-2**, as described above.<br><br>For **Impact-BIO-7**:<br>Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.<br><br>For **Impact-BIO-8**:<br>Implement **MM-BIO-1** and **MM-BIO-2**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | *Operation:*<br>**Impact-BIO-9** and **Impact-BIO-10**, as described above. | Potentially Significant | For **Impact-BIO-9**:<br>Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.<br><br>For **Impact-BIO-10**:<br>Implement **MM-BIO-1** and **MM-BIO-2**, as described above. | *Operation:*<br>Less than Significant |
| *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 CDFW or USFWS* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:*<br>**Impact-BIO-16: Potential to Have an Adverse Effect on Any Riparian or Other Sensitive Vegetation Community Identified in Local or Regional Plans, Policies, or Regulations, or by California Department of Wildlife or U.S. Fish and Wildlife Service.** Construction activities including grading, filling, and ground disturbance associated with the Proposed Program could remove existing sensitive riparian or vegetation communities and result in a direct impact**.** This is a potentially significant impact. | Potentially Significant | Implement **MM-BIO-1** and **MM-BIO-2**, as described above, and **MM-HWQ-1: Implement Construction Best Management Practices**, as described in Section 4.9, *Hydrology and Water Quality*. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>No operational activities would result in a substantial adverse effect on riparian or other sensitive vegetation communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Whole Site Modernization, Upgrades of Existing School and Administrative Facilities, and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:* Construction activities associated with whole site modernization projects, upgrades of existing school and administration facilities, and joint-use facilities would not result in substantial adverse impacts on riparian or other sensitive vegetation communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* No operational activities would result in a substantial adverse effect on riparian or other sensitive vegetation communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:* Construction activities associated with the near-term, site-specific whole site modernization projects would not result in substantial adverse impacts on riparian or other sensitive vegetation communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation of the near-term, site-specific whole site modernization projects would not involve activities | No Impact | No mitigation is required. | *Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | that would affect riparian habitat or other sensitive natural communities and no impacts would occur. | | | |
| *Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction*:<br>**Impact-BIO-17: Potential to have an adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, and coastal wetlands) through direct removal, filling, hydrological interruption, or other means.** Construction activities associated with the Proposed Program including significant clearing and grubbing, grading and excavation, filling and compaction, and other ground-disturbing activities could significantly affect protected wetlands. This is a potentially significant impact. | Potentially Significant | Implement **MM-BIO-1** and **MM-BIO-2**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>No operational activities associated with these project categories would result in a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, and coastal wetlands) through direct removal, filling, hydrological interruption, or other means. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Whole Site Modernization, and Joint-Use Facilities Development Including Fields, Pools, and Play all Day Program | *Construction:*<br>**Impact-BIO-18: Potential to Have an Adverse Effect on State or Federally Protected Wetlands (Including, But Not Limited to, Marshes, Vernal Pools, and Coastal Wetlands) Through Direct Removal, Filling, Hydrological Interruption, or Other Indirect Means.** Construction activities associated with improvements to existing District properties, including significant clearing and grubbing, grading and excavation, filling and compaction, and other ground-disturbing activities could significantly affect state and federally protected wetlands either directly (by occurring within the boundaries of the resource) or indirectly (by occurring within 250 feet of the resource). | Potentially Significant | Implement **MM-BIO-1** and **MM-BIO-2**, as described above. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>No operational activities would result in a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes and vernal pools) through direct removal, filling, hydrological interruption, or other means. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Upgrades of Existing School and Administrative Sites; | *Construction:*<br>Construction activities related to upgrades of existing school and administrative sites would vary, but would occur entirely within the developed areas of any District property and would not involve significant clearing and grubbing. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>No operational activities would result in a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes and vernal pools) through direct removal, filling, hydrological interruption, or other means. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>**Impact-BIO-18**, as described above. | Potentially Significant | Implement **MM-BIO-1** and **MM-BIO-2**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>No operational activities would result in a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes and vernal pools) through direct removal, filling, hydrological interruption, or other means and no impacts would occur. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| *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* | | | | |
| New Acquisition and New School or | *Construction:*<br>**Impact-BIO-19: Potential to Interfere Substantially With the Movement of Any Native Resident** | Potentially Significant | Implement **MM-BIO-1**, and **MM-BIO-2**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Administrative Facilities | **or Migratory Fish or Wildlife Species or With Established Native Resident or Migratory Wildlife Corridors or Impede the Use of Native Wildlife Nursery Sites During Construction.** Construction activities associated with new school or administrative facilities could interfere with wildlife movement by disturbing migratory bird species' nesting habitat. This is a potentially significant impact. | | | |
| | *Operation:* No operational activities associated would interfere substantially with the movement of 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 | No mitigation is required. | *Operation:* Not Applicable |
| Whole Site Modernization; Upgrades of Existing School and Administrative Sites; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:* **Impact-BIO-20: Potential to 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 During Construction.** Construction activities associated with improvements to existing District facilities could interfere with wildlife movement by disturbing migratory | Potentially Significant | Implement **MM-BIO-1** and **MM-BIO-2**, as described above. | *Construction:* Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | bird species' nesting habitat. This is a potentially significant impact. | | | |
| | *Operation:*<br>No operational activities would interfere substantially with the movement of 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 | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>**Impact-BIO-20**, as described above. | Potentially Significant. | Implement **MM-BIO-1** and **MM-BIO-2**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>No operational activities would interfere substantially with the movement of 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 | No mitigation is required. | *Operation:*<br>Not Applicable |
| *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:*<br>**Impact-BIO-2**, as described above.<br><br>**Impact-BIO-21: Potential to Conflict With Any Local Policies or Ordinances Protecting Biological Resources, Such as a Tree Preservation Policy or Ordinance, During Construction.** Construction activities associated with new non- | Potentially Significant | For **Impact-BIO-2**:<br>Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.<br><br>For **Impact-BIO-21**:<br>Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | educational facilities at new site acquisitions could conflict with the Environmentally Sensitive Lands Ordinance or Public Tree Protection Policy. This is a potentially significant impact. | | **MM-BIO-4**: **Obtain a Tree Removal Permit and Provide Compensatory Mitigation.** Prior to construction for a non-educational facility at a new site acquisition, the District shall apply for a tree removal permit with the City of San Diego and provide compensatory mitigation as required by the City for any protected trees slated for removal. | |
| | *Operation:*<br>Operation of new school and administrative facilities would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Whole Site Modernization | *Construction:*<br>**Impact-BIO-7**, as described above. | Potentially Significant | Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>Operational activities associated with the Proposed Program would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Upgrades of Existing School and Administrative Sites; and Joint-Use Facilities Development Including Fields, Pools, | *Construction:*<br>**Impact-BIO-11**, as described above. | Potentially Significant | Implement **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>No operational activities would conflict with any local policies or ordinances protecting biological resources. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| and Play All Day Program | | | | |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>**Impact-BIO-7**, as described above. | Potentially Significant | Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>No operation activities would occur related to a conflict with any local policies or ordinances protecting biological resources. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| *Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:*<br>**Impact-BIO-2**, as described above. | Potentially Significant | Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>No operational activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Whole Site Modernization | *Construction:*<br>**Impact-BIO-7**, as described above. | Potentially Significant | Implement **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>No operational activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Upgrades of Existing School and | *Construction:*<br>**Impact-BIO-11**, as described above. | Potentially Significant | Implement **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| Administrative Sites; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Operation*:<br>No operational activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>**Impact-BIO-7**, as described above. | Potentially Significant | Implement **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>No operational activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| **4.4 Cultural Resources** | | | | |
| *Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:*<br>**Impact-CUL-1: Potential to Cause a Substantial Adverse Change in the Significance of a Historical Resource through Demolition and Construction of a New School or Administrative Facility.** Demolition and construction activities associated with new acquisition and new school or administrative facilities could result in significant impacts on historical resources through demolition of existing buildings or complexes. Any demolition of a known or yet-to-be identified | Potentially Significant | For **Impact-CUL-1** and **Impact-CUL-2:**<br><br>**MM-CUL-1: Prepare a Historical Resource Evaluation of Buildings, Complexes, and Other Potentially Significant Built Environment Resources 45 Years Old or Older that Are Subject to Demolition or Modification.** A Historical Resource Evaluation (HRE) shall be required at existing school sites or newly acquired sites when the following conditions apply: (1) construction activity would potentially demolish or otherwise alter an existing 45-year-old or older building, complex, or structure; and (2) that building, complex, or structure has not previously been evaluated for California Register of Historical Resources (CRHR) | *Construction:*<br>Significant and Unavoidable |

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| | California Register of Historical Resources (CRHR)-eligible building or complex would constitute a significant impact on a historical resource. Some improvements to known or yet-to-be identified CRHR-eligible buildings could result in a significant impact on a historical resource.<br><br>**Impact-CUL-2: Potential to Cause Substantial Adverse Change in the Significance of a Historical Resource through Physical Alteration During Construction of a New School or Administrative Facility.** Alterations of existing buildings and complexes associated with construction of new school or administrative facilities could result in significant impacts on historical resources. Depending on the degree and nature of such modifications planned for specific buildings and complexes, impacts on historical resources could be less than significant in some cases. However, a significant impact on a historical resource would occur if any modifications diminished the historical integrity and eliminated character-defining features of a California Register of Historical Resources (CRHR)-eligible building or complex so as to result in substantial adverse change in the | | eligibility to determine if it qualifies as a historical resource under CEQA. Prior to any approval of a future project proposed for existing school properties or a property acquired for school development, the District shall retain a cultural resources specialist who meets or exceeds the Secretary of the Interior Qualifications Standards for architectural historian to define an appropriate historical resources study area for the project. The study area shall account for potential direct and indirect impacts on historical resources. The architectural historian shall survey and research the study area to identify built resources known to qualify as a historical resource under CEQA as a result of previous evaluation or designation, and shall record and formally evaluate built resources not previously designated that could potentially qualify as historical resources under CEQA. Evaluations shall apply CRHR significance criteria and integrity considerations. The recorded resources and resource evaluations shall be documented in California Department of Recreation (DPR) 523 forms. When a historical resource is present in the study area, an architectural historian shall analyze project actions to determine if the project would result in a significant impact on the historical resource. The District shall make such a finding if the proposed project would result in the following:<br>• Demolish or materially alter the qualities that make the resource eligible for listing in the CRHR (State CEQA Guidelines Section 15064.5[b][2][A],[C]).<br>• Demolish or materially alter the qualities that justify the inclusion of the resource on a local register or its identification in an historical resources survey meeting the requirements of | |

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| | significance of a historical resource. In such instances, impacts would be significant. | | California Public Resources Code (PRC) Section 5024.1(g), unless the District establishes by a preponderance of evidence that the resource is not historically or culturally significant (State CEQA Guidelines Section 15064.5[b][2][B]).<br>• Alter, directly or indirectly, the qualities that make a resource eligible for listing in the National Register of Historic Places (NRHP) (36 CFR 800.5[a][1]).<br>• Cause a substantial adverse change in the significance of an historical resource (California PRC Section 21084.1).<br>The District shall make these findings prior to the approval of any project examined under the measure.<br><br>**MM-CUL-2: Arrange Archival Documentation of Historical Resources.** For existing and new schools and administrative sites, the District shall arrange for preparation of archival documentation to reduce impacts on historical resources that meet California Register of Historical Resources Criterion 3, as architecturally significant historical resources, as important examples of a master architect or builder's work, and/or as resources that embody distinctive characteristics of a type, period, or method of construction. The District shall retain a Secretary of the Interior qualified preservation professional to document such resources through archival photography, physical description, and historical narrative to be distributed to one or more appropriate local repositories. Potentially appropriate repositories include the San Diego Public Library, the San Diego History Center, other local historical societies, and local university library | |

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| | | | special collections. Archival documentation of historical resources would be prepared in accordance with the National Parks Service's guidelines for Historic American Buildings Survey, Historic American Landscape Survey, and Historic American Engineering Record documentation. The documentation shall provide a record of the resource's character-defining features prior to alteration, the historical context of its development, and other historical information pertinent to its significance. The level and degree of documentation would be commensurate with size, extent, and level of the documented historical resource's significance.<br><br>**MM-CUL-3: Provide Interpretive and/or Educational Media.** For existing and new schools and administrative sites, the District shall arrange for preparation of interpretive and/or educational media to reduce impacts on historical resources that meet California Register of Historical Resources Criterion 1 for direct association with an important event or pattern of events, or Criterion 2 for direct association with the work of a historically significant individual. The District shall retain an Secretary of the Interior qualified historic preservation professional to prepare or advise on the preparation of appropriate interpretive and/or educational media such as displays in public spaces, print materials, or websites. Interpretive and educational media may incorporate written, photographic, and archival documentation (such as those compiled according to National Parks Service's guidelines for Historic American Buildings Survey, Historic American Landscape Survey, and Historic American Engineering Record), oral history interviews, video, or animation to tell the story of the heritage | |

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| | | | represented by the impacted resource. Interpretive media is an appropriate mitigation for built resources qualifying as historical resources under CEQA not for their design qualities, but rather, for their significant associations with events that have made a significant contribution to the broad patterns of San Diego's or California's history and cultural heritage, or for their significant associations with the principle noteworthy activities of individuals important to our past. The District shall evaluate any interpretive and/or educational media proposals and determine the effectiveness of such measures at reducing project-specific impacts as part of the discretionary approval of any project under this Program with the potential to impact historic resources.<br><br>**MM-CUL-4: Ensure that Any Alteration of Historical Resources Is in Accordance with Secretary of the Interior Standards.** For existing and new schools and administrative sites, to the extent feasible, the District shall retain a Secretary of the Interior (SOI)-qualified historic preservation professional (subject to District approval) to assist in the preparation of design measures that provide for improvements to a historical resource that conform to SOI Standards for the Treatment of Historic Properties (SOI Standards) When feasible, District staff shall work with an SOI-qualified historic preservation professional to redesign project elements so that proposed improvements do not result in a substantial adverse change in the significance of a historical resource. Design measures shall provide for improvements to be undertaken so as to ensure that the subject historical resource sufficiently retains historical integrity and the | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | character-defining features that convey its significance. This process shall include preparation of a character-defining feature inventory if an adequate one does not exist, design consultation with an SOI-qualified professional to ensure compliance with SOI Standards, and plan review and approval by an SOI-qualified professional. Depending on the level of the historical resource significance and the scope of alterations to be undertaken, this process may also require the SOI-qualified professional to participate in preconstruction meetings and conduct construction monitoring to ensure and document compliance with the applicable SOI Standards. Where feasible, the District shall also consider relocation of a historical resource subject to potential demolition at a site acquired for new school development in accordance with SOI Standards.<br>Prior to project approval, the District will consider the steps taken pursuant to this measure and determine residual significance for any project to which this measure applies. | |
| | *Operation:*<br>There would be no impacts on historical resources related to operation of this project category. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Whole Site Modernization | *Construction:*<br>**Impact-CUL-3: Potential to Cause a Substantial Adverse Change in the Significance of a Historical Resource through Demolition and Construction of Existing District Facilities.** Demolition and construction activities associated with whole site modernization projects could result in significant | Potentially Significant | For **Impact-CUL-3** and **Impact-CUL-4:**<br><br>Implement **MM-CUL-1** through **MM-CUL-4**, as described above. | *Construction:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | impacts on historical resources through demolition of existing buildings or complexes. Any demolition of a known or yet-to-be identified California Register of Historical Resources (CRHR)-eligible building or complex would constitute a significant impact on a historical resource. Some improvements to existing school complexes and known or yet-to-be identified CRHR-eligible school complexes and buildings could result in a significant impact on a historical resource.<br><br>**Impact-CUL-4: Potential to Cause Substantial Adverse Change in the Significance of a Historical Resource through Physical Alteration of Existing District Facilities.** Alterations of existing school buildings and complexes associated with whole site modernization projects or upgrades of existing school and administrative sites could result in significant impacts on historical resources. Depending on the degree and nature of such modifications planned for specific school buildings and complexes, impacts on historical resources could be less than significant in some cases. However, a significant impact on a historical resource would occur if any modifications diminished the | | | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | historical integrity and eliminated character-defining features of a California Register of Historical Resources-eligible building or complex so as to result in substantial adverse change in the significance of a historical resource. In such instances, impacts would be significant. | | | |
| | *Operation*:<br>There would be no impacts on historical resources related to operation of this project category. | No Impact | No mitigation is required. | *Operation;*<br>Not Applicable |
| Upgrades of Existing School and Administrative Sites | *Construction:*<br>**Impact-CUL-4,** as described. | Potentially Significant | Implement **MM-CUL-1** through **MM-CUL-4**, as described above. | *Construction:*<br>Significant and Unavoidable |
| | *Operation:*<br>There would be no impacts on historical resources related to operation of this project category. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>This project category would occur within areas of existing school sites where recreational facilities are currently located. The existing structures and objects of those existing facilities are ubiquitous elements of a school's built environments that do not contribute to school buildings and complexes that qualify as historical resources. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | *Operation:*<br>There would be no impacts on historical resources related to operation of this project category. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>Planned construction activities involving these 21 school properties would not result in impacts on a historical resource. | No Impact | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operations of the 21 near-term, site-specific whole site modernization projects would not demolish, physically alter, or otherwise diminish the historical integrity of a building or school complex qualifying has a historical resource under CEQA. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| *Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:*<br>**Impact-CUL-5**: **Disturbance and/or Destruction of Previously Recorded and/or Undiscovered Archaeological Resources During Construction Related to New Acquisition and New School or Administrative Facilities.** Ground-disturbing activities associated with new school or administrative facilities could result in damage or destruction of archaeological resources. This would constitute a significant impact on an archaeological resource. | Potentially Significant | **MM-CUL-5: Prepare an Archaeological Sensitivity Analysis.** An archaeological sensitivity analysis shall be prepared during project-specific CEQA analyses for a project that involves ground disturbance or excavation at new school or administrative sites, or at the 164 existing sites with unknown archaeological sensitivity.<br>The archaeological sensitivity analysis shall include:<br>• Obtaining a record search at SCIC that includes the school property and at minimum a quarter-mile buffer.<br>• Obtaining a Sacred Lands file search from the NAHC.<br>• Reviewing available historic maps, historic aerials, Sanborn fire insurance maps, small-scale | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | plot plans, and geotechnical investigation reports of the school property.<br>A cultural resources memo shall be prepared summarizing the results of the record search and background research and illustrating the history of development and disturbances at the school property. The memo shall discuss the potential for historic and prehistoric archeological resources to be present at the school property. Additionally, the memo shall identify potential impacts and provide recommendations.<br>The cultural resources archaeological recommendations shall be valid for 5 years after the date of the record search. After 5 years, the District shall retain an archaeologist who shall acquire an updated record search from the SCIC and review the cultural resources memo recommendations.<br>For District properties, where only a record search and/or a site visit have already been conducted prior to this PEIR, the District shall retain an archaeologist to:<br>• Review record search results, site visit results, and any recommendations.<br>• If the record search is older than 5 years, obtain an updated record search from the SCIC.<br>• Review available historic maps, historic aerials, Sanborn fire insurance maps, small-scale plot plans and geotechnical investigation reports of the school property.<br>• Prepare a cultural resources memo with existing or updated record search results; a summary of background research of historic maps, aerials, etc.; and potential for historic and prehistoric archeological resources to be present at the school property. Additionally, the memo shall | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | identify potential impacts and provide recommendations.<br>The District will review these findings and make a determination regarding the significance of project-level impacts prior to approval of any project.<br><br>**MM-CUL-06: Conduct Archaeological Monitoring.** Where the above analysis **(MM-CUL-05)** indicates that a project would result in significant impacts on archaeological resources, archaeological monitoring shall be required. Specifically, the District and/or its construction supervisor shall ensure the following measures are implemented:<br>• Initial grading and/or excavating shall be monitored by a qualified archaeologist who is supervised by a Lead Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards, as outlined in 36 Code of Federal Regulations (CFR) 61.<br>• The Lead Archaeologist shall participate in a preconstruction meeting to inform all personnel of the potential to encounter archaeological materials during construction.<br>• If the archaeological monitor, through observation and professional judgment, determines that a particular location is not archaeologically sensitive because of lack of native soil or previous disturbance, the archaeological monitor may reduce or curtail monitoring efforts in that location.<br>• Monitoring efforts may be reduced if some of the areas with potential for culturally sensitive materials are determined to have a low potential to contain cultural resources upon exposure and | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | examination by the qualified archaeological monitor.<br>• If an artifact is discovered that requires collection, the archaeological monitor shall have the authority to temporarily halt construction activities in the immediate area of the find, and be given sufficient time to recover the item(s) and map its location with a GPS device.<br>• In the event that cultural materials (e.g., bone, chipped stone, ground stone, shell, glass, ceramics, metal) are located below surface during the construction of a project, work shall be halted in that area so that the significance of the find can be determined by the Lead Archaeologist, and, if necessary, appropriate treatment measures can be developed in consultation with the District. Treatment measures typically include development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs, such as excavation or detailed documentation, following standard archaeological procedures.<br>• Recovered items shall be treated in accordance with current professional standards by being properly provenienced, cleaned, analyzed, researched, reported, and curated in a collection facility meeting the SOI's Standards, as promulgated in 36 CFR 79, such as the San Diego Archaeological Center.<br>• A monitoring report shall be prepared by the Lead Archaeologist and submitted to the District for review and approval. The report shall discuss the monitoring methods and results, and provide interpretations about any recovered materials or sites identified, if any. The final report shall be | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | submitted to the District and the South Coastal Information Center. | |
| | *Operation:*<br>There would be no impacts on archaeological resources related to operation of these project categories. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Whole Site Modernization; Upgrades of Existing School and Administrative Sites; Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact-CUL-6: Disturbance and/or Destruction of Previously Recorded and/or Undiscovered Archaeological Resources.** Ground-disturbing activities at existing school sites associated with implementation of the Proposed Program could result in damage or destruction of archaeological resources and would constitute a significant impact on an archaeological resource. | Potentially Significant | Implement **MM-CUL-5** and **MM-CUL-6**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>Operation of District facilities subject to the Proposed Program would not involve ground disturbance and therefore would not damage or destroy an archaeological resource. No impact on an archaeological resource would occur. | No Impact | No mitigation is required. | *Operation:*<br>Less than Significant |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>**Impact-CUL-7**: **Disturbance and/or Destruction of Significant Archaeological Resources.** Implementation of future construction activities at Crown Point Junior Music Academy and Barnard Asian Pacific Language | Potentially Significant | Implement **MM-CUL-6**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | Academy would result in potentially significant impacts on archaeological resources. | | | |
| | *Operation:*<br>Operations of the 21 near-term, site-specific whole site modernization projects would not involve ground disturbance and therefore would not damage or destroy an archaeological resource. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| *Disturbance of Human Remains, including those interred outside of dedicated cemeteries* | | | | |
| All Project Categories | *Construction:*<br>Construction-related elements of the Proposed Program have the potential to disturb human remains, including those interred outside of formal cemeteries. Potentially significant impact(s) include damage to or destruction of human remains. If human remains are discovered, work must halt in that area and the procedures as set forth in PRC Section 5097.98 and State Health and Safety Code Section 7050.5 must be undertaken. Therefore, because regulations are present that ensure disturbances to human remains are minimized, the Proposed Program impacts on human remains would be less than significant. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operation of these project categories would not require any construction | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | activities involving excavation or other ground disturbances. | | | |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction*:<br>Ground-disturbing activities associated with the whole site modernization projects at the 21 near-term sites have the potential to disturb human remains, including those interred outside of formal cemeteries, and could result in damage or destruction of human remains. If human remains are discovered at any of the 21 schools sites, work must halt in that area and the procedures as set forth in PRC Section 5097.98 and State Health and Safety Code Section 7050.5 must be undertaken. Any potential impacts on human remains would thereby be reduced to a less-than-significant level. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operations at the 21 school sites would not require excavation or other ground-disturbing activities. No impact on human remains would occur as a result of operation. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| **4.5 Energy** | | | | |
| *Wasteful, inefficient, or unnecessary consumption of energy resources* | | | | |
| New Acquisition and New School or Administrative | *Construction:*<br>**Impact-EN-1: Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of New School** | Potentially Significant | Implement **MM-GHG-1: Implement Best Management Practices During Construction**, as described below. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Facilities Construction | **or Administrative Facilities.** Construction activities associated with new acquisition and new school or administrative facilities projects would have the potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. This is a potentially significant impact. | | | |
| | *Operation:* Operations associated with new school and administrative facilities would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Whole Site Modernization | *Construction:* **Impact-EN-2: Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects would have the potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. This is a potentially significant impact. | Potentially Significant | Implement **MM-GHG-1,** as described below. | *Construction:* Less than Significant |
| | *Operation:* Operations associated with whole site modernization projects would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Upgrades of Existing School and Administrative Sites | *Construction:*<br>**Impact-EN-3: Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Upgrades of Existing School and Administrative Sites.** Construction activities associated with upgrades of existing school and administrative sites projects would have the potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. This is a potentially significant impact. | Potentially Significant | Implement **MM-GHG-1,** as described below. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>Operations associated with upgrades of existing school and administrative sites would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact-EN-4: Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Joint-Use Facilities.** Construction associated with joint-use facilities projects would have the potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. This is a potentially significant impact. | Potentially Significant | Implement **MM-GHG-1,** as described below. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | *Operation:*<br>Operations associated with joint-use facilities would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>**Impact-EN-2,** as described above. | Potentially Significant | Implement **MM-GHG-1,** as described below. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>Operations associated with the near-term, site-specific whole site modernization projects would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency* | | | | |
| All Project Categories | *Construction and Operation:*<br>**Impact-EN-5: Inconsistency with District Environmental Sustainability Goals.** The Proposed Program could result in energy use due to construction and long-term operations. While future projects would aim to implement District-wide energy-reducing actions per its *Dream Big* initiative, design guide, and Collaborative for High Performance Schools criteria, there is no guarantee that all actions and design criteria would be incorporated into the design of all future projects. Therefore, it is conservatively assumed that all project categories under the | Potentially Significant | Implement **MM-GHG-2: Incorporate Sustainable Design Features**, as described below. | *Construction and Operation:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | Proposed Program would be inconsistent with the energy efficiency goals set forth by the District. This is a potentially significant impact. | | | |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction and Operation:*<br>**Impact-EN-5**, as described above. | Potentially Significant | Implement **MM-GHG-2**, as described below. | *Construction and Operation:*<br>Less than Significant |
| **4.6 Geology and Soils** | | | | |
| *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*<br>a. *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.*<br>b. *Strong seismic ground shaking.*<br>c. *Seismic-related ground failure, including liquefaction.*<br>d. *Landslides* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:*<br>Construction activities associated with new school or administrative facilities would not result in increased risk of loss, injury, or death due to geologic hazards. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operation of new school or administrative facilities would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Whole Site Modernization | *Construction:* Construction activities associated with whole site modernization projects would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation of whole site modernization projects would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:* Construction activities associated with joint-use facilities would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation of joint-use facilities would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Upgrades of Existing School and Administrative Sites | *Construction:* Construction associated with the upgrades of existing school and administrative sites would not result in increased risk of loss, injury, or death due to geologic hazards. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | Impacts would be less than significant. | | | |
| | *Operation:*<br>Operation following upgrades of existing school and administrative sites would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization | *Construction:*<br>Construction of near-term, site-specific whole site modernization projects would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operation of near-term, site-specific whole site modernization projects would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| *Result in substantial soil erosion or the loss of topsoil* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:*<br>**Impact GEO-1: Potential to Result in Substantial Soil Erosion or the Loss of Topsoil During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could expose soils to the elements, which could cause | Potentially Significant | **MM-HWQ-1: Implement Construction Best Management Practices.** Prior to the onset of any construction activities affecting over 1 acre of land, the District shall obtain coverage under the National Pollutant Discharge Elimination System Construction General Permit, as issued by the San Diego Regional Water Quality Control Board. The District shall be responsible for ensuring that construction activities comply with the conditions in this permit, including development of a Stormwater Pollution Prevention | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | substantial soil erosion or the loss of topsoil. | | Plan (SWPPP), implementation of Best Management Practices (BMPs) identified in the SWPPP, and monitoring (as required) to ensure that effects on water quality are minimized. As part of this process, the District shall implement multiple erosion and sediment control BMPs in areas with the potential to drain to surface water. Guidelines established in the City of San Diego Jurisdictional Runoff Management Plan or equivalent guidelines shall be followed in selecting, implementing, and monitoring BMPs for construction activities. The District shall verify that a notice of intent has been submitted to the State Water Resources Control Board and a SWPPP has been completed before allowing construction to begin.<br><br>Prior to the onset of any construction activities under 1 acre, the District shall prepare a BMP Plan that identifies implementation of best management practices to ensure that effects on water quality are minimized. As part of this process, the District shall implement multiple erosion and sediment control BMPs in areas with the potential to drain to surface water. | |
| | *Operation:*<br>Operational activities associated with new school or administrative facilities would result in less-than-significant impacts related to substantial soil erosion or loss of topsoil. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Whole Site Modernization; Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact GEO-2: Potential to Result in Substantial Soil Erosion or the Loss of Topsoil during Construction of Whole Site Modernizations or Joint-use Facilities.** Construction activities associated with new school or administrative facilities, whole site modernizations, or joint-use facilities could expose soils to the elements, which could cause substantial soil erosion or the loss of topsoil. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operational activities associated with whole site modernizations or joint-use facilities would result in less-than-significant impacts related to exposing soils to the elements, which could cause substantial soil erosion or the loss of topsoil. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Upgrades of Existing School and Administrative Sites | *Construction:*<br>Construction activities associated with the Upgrades of Existing School and Administrative Sites project category would not result in substantial soil erosion or the loss of topsoil. There would be no impacts. | No Impact | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operation of an existing school or administrative facility would not involve ground-disturbing activities. Therefore, the Upgrades of an Existing School and Administrative Sites project category would not | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | result in substantial soil erosion or the loss of topsoil during operation. | | | |
| Near-Term, Site-Specific Whole Site Modernization | *Construction:* Construction activities associated with near-term, site-specific whole site modernization projects would not result in substantial soil erosion or loss of topsoil. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation of an existing school or administrative facility would not involve ground-disturbing activities. Therefore, near-term, site-specific whole site modernization projects would not result in substantial soil erosion or the loss of topsoil during operation. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| *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* | | | | |
| New Acquisition and New School or Administrative Facilities; Whole Site Modernization; Joint-Use Facilities Development Including Fields, Pools, | *Construction:* Construction activities associated with New Acquisition and New School or Administrative Facilities; Whole Site Modernization; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories would not be located on a geologic unit or soil that is unstable and potentially result in lateral spreading, subsidence, or collapse. Impacts would be less than significant. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| and Play All Day Program | *Operation:*<br>Operation of an existing or new school, charter school, administrative facility, or joint-use facility would not involve activities that would cause a geologic unit or soil to become unstable or exacerbate unstable soil in a way that would potentially result in lateral spreading, subsidence, or collapse. No impacts would occur. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Upgrades of Existing School and Administrative Sites | *Construction:*<br>Construction activities associated with the Upgrades of Existing School and Administrative Sites project category would not be constructed on a geologic unit or soil that would potentially result in lateral spreading, subsidence, or collapse. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operation of an existing school or administrative facility would not involve activities that would cause a geologic unit or soil to become unstable or exacerbate unstable soil in a way that would potentially result in lateral spreading, subsidence, or collapse. No impacts would occur. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization | *Construction:*<br>Construction of near-term, site-specific whole site modernization projects would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in an on- or offsite landslide, | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | lateral spreading, subsidence, liquefaction, or collapse. | | | |
| | *Operation:*<br>Operation of near-term, site-specific whole site modernization projects would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in an on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| *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* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:*<br>Construction associated with New Acquisition and New School or Administrative Facilities projects would not place structures on expansive soils and thus would not create substantial direct or indirect risks to life or property. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operation of the New Acquisition and New School or Administrative Facilities project category would not place structures on expansive soils and thus would not create substantial direct or indirect risks to life or property. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Whole Site Modernization; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:* Construction of projects under the Whole Site Modernization and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program categories would not place structures on expansive soils and thus would not create substantial direct or indirect risks to life or property. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* The Whole Site Modernization and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories do not include a change in current operations at existing school sites. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Upgrades of Existing School and Administrative Sites | *Construction:* The Upgrades of Existing School and Administrative Sites project category does not include the construction of new structures. Any ground-disturbing activities would be minimal and contained to previously disturbed areas. Therefore, this project category would not place structures on expansive soils and thus would not create substantial direct or indirect risks to life or property. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* The Upgrades of Existing School and Administrative Sites project category | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | does not include a change in current operations at existing school sites. | | | |
| Near-Term, Site-Specific Whole Site Modernization | *Construction:*<br>Construction of near-term, site-specific whole site modernization projects would not 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 | No mitigation is required. | *Construction:*<br>Not Applicable |
| | Operation:<br>Operation of near-term, site-specific whole site modernization projects would not 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 | No mitigation is required. | *Operation:*<br>Not Applicable |
| **4.7 Greenhouse Gas Emissions** | | | | |
| *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment* | | | | |
| New Acquisition and New School or Administrative Facilities Construction | *Construction:*<br>**Impact-GHG-1: Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Construction.** Depending on the size and scale of an individual project, along with its construction schedule and other parameters, there may also be instances where the construction-related emissions generated by a single project could be substantial. | Potentially Significant | Implement **MM-AQ-2: Require Construction Fleet to Use Renewable Diesel**, as described above.<br><br>**MM-GHG-1: Implement Best Management Practices During Construction**. The District shall incorporate best management practices to reduce greenhouse gas emissions during construction, as applicable. Best management practices may include, but are not limited to:<br>• Use local building materials.<br>• Recycle construction waste or demolition materials.<br>• Implement employee carpool programs. | *Construction:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | This is a potentially significant impact. | | Maintain all construction equipment in proper working condition according to manufacturers' specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated. | |
| | *Operation:*<br>**Impact-GHG-2: Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Operation.** The Proposed Program could result in long-term greenhouse gas emissions, exceeding District-specific thresholds, where applicable. Future projects would be encouraged to implement District-wide sustainability actions per the *Dream Big* initiative, Collaborative for High Performance Schools criteria, Zero Net Energy Plan, and the District's Board policies and administrative regulations. However, while the District would aim to implement all applicable actions and design criteria, there is no guarantee that all actions and design criteria will be incorporated into the project design of all future projects or that these measures would be effective in meeting the District's efficiency thresholds. Therefore, the Proposed Program is conservatively assumed to conflict with the state's 2030 emissions reduction target or the | Potentially Significant | **MM-GHG-2: Incorporate Sustainable Design Features**: To ensure future projects would reduce operational greenhouse gas (GHG) emissions, during project planning and design phases, the District shall require all future projects to incorporate sustainable design features, including, but not limited to, the following:<br>• All interior/exterior lighting shall be LED lighting.<br>• Photovoltaic (PV) solar systems shall be installed at school sites that meet the siting criteria in the District's *Solar PV Design Guide*.<br>• All school sites shall have an Energy Management System to control heating, ventilation, and air conditioning (HVAC) systems for all school site rooms.<br>• All school sites shall provide adequate amounts of trash, recycle, and food waste receptacles that are easily accessible to staff and students. | *Operation:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | 2017 Scoping Plan. This is a potentially significant impact. | | | |
| Whole Site Modernization and Upgrades of Existing School and Administrative Sites | *Construction:* **Impact-GHG-1,** as described above. | Potentially Significant | Implement **MM-AQ-2** and **MM-GHG-1**, as described above. | *Construction:* Significant and Unavoidable |
| | *Operation:* **Impact-GHG-2,** as described above. | Potentially Significant | Implement **MM-GHG-2**, as described above. | *Operation:* Significant and Unavoidable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:* **Impact-GHG-1,** as described above. | Potentially Significant | Implement **MM-AQ-2** and **MM-GHG-1**, as described above. | *Construction:* Significant and Unavoidable |
| | *Operation:* **Impact-GHG-2,** as described above. | Potentially Significant | Implement **MM-GHG-2**, as described above. | *Operation:* Significant and Unavoidable |
| Near-Term, Site-Specific Whole Site Modernization | *Construction:* **Impact-GHG-1,** as described above. | Potentially Significant | Implement **MM-AQ-2** and **MM-GHG-1**, as described above. | *Construction:* Significant and Unavoidable |
| | *Operation:* **Impact-GHG-2,** as described above. | Potentially Significant | Implement **MM-GHG-2**, as described above. | *Operation:* Significant and Unavoidable |
| *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases* | | | | |
| All Project Categories | *Construction and Operation:* **Impact-GHG-3: Potential to Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases.** The Proposed Program could result in construction and long-term operational greenhouse emissions. Future projects would aim to implement District-wide sustainability actions | Potentially Significant | Implement **MM-GHG-1** and **MM-GHG-2**, as described above. | *Construction and Operation:* Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | per its *Dream Big* initiative and design guide, Collaborative for High Performance Schools criteria, Zero Net Energy Plan, and the District's Board policies and administrative regulations. However, while the District would aim to implement all applicable actions and design criteria, there is no guarantee that all actions and design criteria will be incorporated into the project design of all future projects. Therefore, it is conservatively assumed that the Proposed Program's emission levels would be inconsistent with the goals in Executive Order B-55-18/S-3-05. This is a potentially significant impact. | | | |
| Near-Term, Site-Specific Whole Site Modernization | *Construction and Operation:* **Impact-GHG-3,** as described above. | Potentially Significant | Implement **MM-GHG-1** and **MM-GHG-2**, as described above. | *Construction and Operation:* Significant and Unavoidable |
| **4.8 Hazards and Hazardous Materials** | | | | |
| *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* | | | | |
| New Acquisition and New School or Administrative Facilities Construction | *Construction:* **Impact-HAZ-1: Encounter Hazardous Materials During Ground-Disturbing Activities.** Ground-disturbing construction activities at future, unknown sites may encounter soil, groundwater, or vapor contaminated with hazardous materials due to previous uses of the property, that are not listed on Table | Potentially Significant | For **Impact-HAZ-1**: **MM-HAZ-1: Conduct an Environmental Site Assessment.** Prior to acquisition, if not required per California Education Code (CEC) 17213, property-specific due diligence shall be conducted by a licensed Professional Geologist, Professional Engineering Geologist, or Professional Engineer with more than 2 years of experience conducting hazardous material and contamination assessments. | *Construction:* Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | 4.8-2, which could result in a significant hazard to the public or the environment. This is a potentially significant impact.<br><br>**Impact-HAZ-2: Encounter Contamination or Munitions on Sites Listed as Formerly Used Defense Sites.** Ground-disturbing activities at new acquisition and new school or administrative facilities, the locations of which are as yet unknown, could occur on a Formerly Used Defense Site (FUDS). This ground disturbance could encounter potential contamination or munitions from unexploded ordnance (UXO), munitions debris (MD), or munitions and explosives of concern (MECs). This could result in a significant hazard to the public or the environment. This is a potentially significant impact. | | The following steps shall be implemented, as appropriate.<br>• **Prepare Phase I Environmental Site Assessment.** A Phase I Environmental Site Assessment (ESA) shall be conducted in accordance with the standard of care at that time (currently the ASTM Standard Practice E1527-13) and applicable regulations (currently the U.S. Environmental Protection Agency's [EPA's] 40 Code of Federal Regulations 312: *Standards and Practices for All Appropriate Inquiries*). If the Phase I ESA is being prepared for a project that will use state funding, the Phase I ESA must also be prepared in accordance with the requirements detailed in in California Code of Regulations Section 69104.<br>• **Prepare a Phase I ESA Addendum**. For a project that will use state funding, Department of Toxic Substances Control (DTSC) permits evaluation of lead from lead-based paint (LBP), organochlorine pesticides from termiticides, or polychlorinated biphenyls from electrical transformers to be addressed in a Phase I Addendum if the site is a school, residential, or commercial property; if these are the only recognized environmental conditions on site; and if the environmental review process for the site has not reached a Preliminary Environmental Assessment (PEA). The work should be performed in accordance with the DTSC's *Interim Guidance: Evaluation of School Sites with Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers (2006).* A PEA would be used to evaluate contamination if | |

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| | | | there are additional recognized environmental conditions identified on the site or if the Phase I Addendum identifies significant contamination (see below). DTSC may permit for a Phase I and Phase I Addendum to be submitted as a PEA equivalent document.<br>• **Prepare Phase II ESA/PEA.** Based on the findings of the Phase I ESA and/or Phase I Addendum, further evaluation through a Phase II ESA or PEA (for projects utilizing state funding) may be recommended, in which case a Phase II ESA or PEA shall be conducted prior to any disturbance of the area suspected of potential contamination, as indicated by the Phase I ESA or Phase I Addendum. For properties with cases under regulatory oversight, the regulatory agency may require an approved work plan prior to commencement of the Phase II ESA or PEA. Results of previous assessment activities for a property (e.g., previous Phase II ESAs, underground storage tank [UST] removal sampling data), if any, shall be evaluated by a qualified environmental hazardous materials professional with more than 2 years of experience preparing and evaluating Phase II ESAs/PEAs. If a PEA is required, it should be prepared in accordance with the current DTSC *Preliminary Endangerment Assessment Guidance Manual*. If the PEA concludes that significant contamination is present, the DTSC may require additional evaluation as detailed in Figure 1-1 Cleanup Process in the DTSC's *Preliminary Endangerment Assessment Guidance Manual*.<br>If the Phase I ESA or the Phase II ESA/PEA indicate potential sites of environmental concern are present on the project site, **MM-HAZ-3** through **MM-HAZ-7** | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | (see below) shall then be implemented as appropriate; or if DTSC requires additional remedial documentation and/or action beyond the scope of **MM-HAZ-3** through **MM-HAZ-7**, such as a Remedial Action Work Plan/Remedial Action Plan, these requirements shall be implemented.<br><br>For **Impact-HAZ-2**:<br>**MM-HAZ-2: Prepare a Munitions Response Plan for New District Sites.** For work occurring within a new acquisition or new school construction site that is located within a known Formerly Used Defense Site (FUDS) area, the following procedures shall be implemented to ensure safety for all students, staff, and contractors working in these areas:<br>• Preparation of a Munitions Response Plan (MRP) consistent with the District's MRP template (see Appendix H) shall be required for the new school or new administrative facility located within the known FUDS areas. The purpose of the MRP is to outline the procedures that must take place in the event an unexploded ordnance is discovered during ground-disturbing activities.<br>• An unexploded ordnance (UXO) awareness briefing shall be conducted for all District staff and contractors who will be involved in any ground disturbance at a new school or administrative facility in a known FUDS area. The awareness briefings shall be completed prior to the start of ground-disturbing activities. Any new personnel shall be trained prior to beginning work on site. See Appendix H for a sample briefing,<br>• Any ground disturbance at new school or administrative facilities located within the | |

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| | | | Rosedale and Linda Vista FUDS areas shall require a preconstruction survey of the area to be disturbed by a qualified UXO technician using a magnetometer, ground penetrating radar, or other appropriate equipment, to locate any potential hazards. The preconstruction survey is meant as a preliminary tool to assess the risk of UXO presence and shall not be used to provide UXO clearance for ground-disturbing activities. All construction-related ground-disturbing activity into native and nonnative soils shall require a UXO technician be present. Monitoring may also be performed in lieu of a preconstruction survey if the presence of UXO materials is assumed.<br>• Monitoring shall be performed during ground disturbance at any new school or administrative facility site where the preconstruction survey identified the presence of a UXO or other hazard. Monitoring shall be conducted by a qualified UXO technician. Monitoring may also be performed in lieu of a preconstruction survey if the presence of UXO materials is assumed.<br>• Miller Elementary School, located at 4343 Shields Street, San Diego, CA 92124 and Hancock Elementary School, located at 3303 Taussig Street, San Diego, CA 92124 are both located within the Camp Elliot Tierra Santa FUDS area. However, they are located on land leased to the District by the United States Department of the Navy. Prior to any ground disturbing activities at these two schools, the District shall coordinate with the Naval Ordnance Safety and Security Activity (NOSSA). For additional information regarding ground disturbing activities at these two schools the District shall contact the | |

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| | | | Department of the Navy, Naval Ordnance Safety and Security Activity, Farragut Hall 3817, Strauss Avenue, Suite 108 Indian Head, MD 20640-5151, Attn: Captain. Eric Bray (301-744-6003). The Navy NOSSA will provide oversight and ensure that all ground distributing activities follow the Navy's protocols to ensure that any potential risk associated with UXOs is avoided. | |
| | *Operation:*<br>Operation of new school or administrative facilities would not result in impacts associated with significant hazards to the public or the environment due to reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Whole Site Modernization; Upgrades of Existing School and Administrative Sites; and Joint Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact-HAZ-3: Encounter Hazardous Materials During Ground-Disturbing Activities.** Ground-disturbing construction activities at the existing District-owned sites listed in Table 4.8-2 may encounter soil, groundwater, or soil vapor contaminated with hazardous materials, which could result in significant hazard to the public or the environment. This is a potentially significant impact.<br><br>**Impact-HAZ-4: Encounter Lead or Organochlorine Pesticides in Soil During Construction.** Ground- | Potentially Significant | For **Impact-HAZ-3** and **Impact-HAZ-4:**<br>**MM-HAZ-3: Prepare a Site Screening Memorandum.** If implementation of whole site modernization, upgrades of existing school and administrative sites, and joint use facilities projects includes ground-disturbing activities, and any such projects are located at one of the school sites listed in Table 4.8-2, during project design and prior to construction, a Site Screening Memorandum, or equivalent, shall be prepared that includes a review of readily available information pertaining to the site to identify if there are any known environmental concerns/hazards at the site that the project may impact.<br>The sources of information to be reviewed should include the Environmental Conditions/Hazards report prepared by Ninyo & Moore and dated August | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | disturbing activities at the site of an existing or former residential structure built before 1980, a school structure built prior to 1992, or any commercial/industrial structure could encounter lead-contaminated soil. Ground-disturbing activities at the site of an existing or former wooden structure (or structure with wooden components) built prior to January 1, 1989, could encounter pesticide-contaminated soil surrounding the structure. Disturbance of these soils could result in a significant hazard to the public or the environment. This is a potentially significant impact.<br><br>**Impact-HAZ-5: Encounter Contamination or Munitions on Sites Listed as Formerly Used Defense Sites.** Ground-disturbing activities at a Formerly Used Defense Site (FUDS) school or administrative facility listed in Table 4.8-3 could encounter potential contamination or munitions from unexploded ordnance (UXO), munitions debris (MD), or munitions and explosives of concern (MECs). This could result in a significant hazard to the public or the environment. This is a potentially significant impact. | | 9, 2019; regulatory agency online databases (e.g., State Water Resources Control Board's GeoTracker, Department of Toxic Substances Control's [DTSC's] Envirostor, United States Army Corps of Engineers Formerly Used Defense Site [FUDS] databases);and readily available online historical aerial photographs (e.g., Google Earth).<br>In addition, the memorandum should evaluate if a proposed project is located on a site that included historic land uses that may have involved the use of lead-based paints (LBPs) or termiticides. The lines of evidence that should be evaluated include:<br>• **Age of construction of the building(s).** Residential buildings constructed prior to January 1, 1979, school structures constructed prior to January 1, 1992, and commercial/industrial structures of any age may have/had LBP; and buildings constructed prior to January 1, 1989, may have had termiticides applied to soil surrounding the building.<br>• **Building construction components**. If the building(s) do/does not have wooden components, then termiticide impacts are not a concern.<br>• **Documentation of termiticide application**. If the District can provide written documentation, which may include a statement signed by a District-representative, that termiticides have not been applied to the soil at the site, then impacts are not a concern.<br>• **LBP survey reports.** Any survey reports available that include testing of the potential lead-containing surfaces on the exterior of the building(s) should be reviewed. Lead in soil would only be a concern if survey results | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | indicate LBP is present on the exterior of the building(s).<br>• **Drainage off of the structure.** If drainage off of the building(s) is directed only to paved areas prior to discharge off of the site, then lead impacts on soil would not be considered a concern.<br>• **Pavement present around the building(s).** If no unpaved areas are present within 4 feet of the building(s) then lead impacts on soil would not be a concern surrounding the building(s); however, lead impacts on soil may be a concern in areas where runoff from the building(s) may flow if those areas are unpaved.<br>The memorandum should provide one of the following conclusions:<br>• No known environmental concerns/hazards identified on the site.<br>• Environmental concerns/hazards identified on the site, but the project will not impact the concerns/hazards.<br>• Environmental concerns/hazards identified on the site, and the project will impact one or more concern/hazard; however, documents have already been prepared that sufficiently address how to manage the concerns/hazards that will be impacted. (Note: These documents may include, but are not limited to, Soil Management Plans, Operations and Maintenance Plans, Worker Health and Safety Plans, and Community Health and Safety Plans.)<br>• Environmental concerns/hazards identified on the site, but additional studies and/or plans are needed to determine if, or to what extent, the project will impact a concern/hazard or to | |

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| | | | address how to manage the concerns/hazards that will be impacted. The memorandum should provide a recommendation for the additional studies and/or plans needed.<br>If the Site Screening Memorandum indicates additional studies or plans are needed to evaluate the potential for impacts or to address how to manage the concerns/hazards to be impacted, **MM-HAZ-2** through **MM-HAZ-7**(see below) will then be implemented, as appropriate.<br><br>**MM-HAZ-4: Prepare a Site Characterization Report.** The District shall prepare a Site Characterization Report to confirm the presence of onsite contamination if recommended by the Site Screening Memorandum. The Site Characterization Report may include onsite sampling to confirm the presence and determine the extent of the contamination, and if the proposed work onsite would encounter or exacerbate the contamination. The Site Characterization Report will include an evaluation of the location and scope of proposed work on the site, and provide sufficient information regarding the location, extent, and level of contamination present for the preparation of the appropriate plans to manage the contamination during the project.<br>If the Site Characterization Report confirms onsite contamination is present and will be impacted by the project, **MM-HAZ-3** through **MM-HAZ-5** (see below) shall then be implemented as appropriate.<br><br>**MM-HAZ-5: Prepare a Soil Management Plan.** If the Site Screening Memorandum or Site Characterization Report determines the proposed | |

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| | | | work may encounter onsite soil and/or groundwater contamination, during project design and prior to construction, the District shall obtain a consultant to prepare a Soil Management Plan (or Soil and Groundwater Management Plan if groundwater will be encountered that has or may have been impacted by existing environmental hazards), if no existing Soil Management Plan exists. The Soil Management Plan shall be prepared by a licensed Professional Geologist, Professional Engineering Geologist, or Professional Engineer with experience in contaminated site redevelopment and restoration and be implemented during soil-disturbing activities under the oversight of a qualified environmental professional on behalf of the District. The plan shall address monitoring of the disturbed soil, soil and groundwater handling, stockpiling, characterization, onsite reuse, export, and disposal protocols. Appropriate references of the potential to encounter contaminated soils and/or groundwater shall be included in construction specifications and bid documents so that the contractor can consider various environmental factors (e.g., groundwater pumping rates, soil disposal, worker health and safety) are appropriately and cost-effectively managed by the contractor. The Soil Management Plan shall be submitted to the District for review and approval. After the District's review and approval, the contractor shall implement the Soil Management Plan.<br><br>**MM-HAZ-6: Prepare a Project-Specific Worker Health and Safety Plan.** For proposed projects that may disturb existing hazardous conditions, the District and the contractor performing the work on behalf of the District, prior to the start of | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | construction, shall each prepare a project-specific Worker Health and Safety Plan for their respective workers. The Worker Health and Safety Plan shall include site-specific information, requirements, and guidelines to be followed while conducting activities that may disturb the existing hazardous materials of concern, which may include but are not limited to, grading, excavation, trenching, boring, dewatering, stockpiling, reusing, handling, or disposing of wastes; and, other applicable site activities. The Worker Health and Safety Plan shall be prepared in accordance with the Federal and State Occupational Safety and Health Administration Hazardous Waste Operations and Emergency Response (HAZWOPER) Standards: 29 Code of Federal Regulations (CFR) 1910.120 and 8 California Code of Regulations (CCR) 5192. The Worker Health and Safety Plan shall include contingencies (i.e., if unknown or unanticipated environmental conditions may exist at the site) for a variety of situations that may arise. The Worker Health and Safety Plan shall be based on the Site Characterization Report, Soil Management Plan, and the planned site construction activities to ensure that site workers potentially exposed to site contamination in soil, groundwater, or vapor are trained, equipped, and monitored during site activity. The training, equipment, and monitoring activities shall ensure that workers are not exposed to contaminants above personnel exposure limits established by Table Z, 29 CFR 1910.1000. The Worker Health and Safety Plan shall be signed by and implemented under the oversight of a California State Certified Industrial Hygienist.<br><br>**MM-HAZ-7: Prepare a Community Health and Safety Plan.** If the Site Characterization Report | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | determines the proposed work may encounter onsite contamination, during project design and prior to construction, the District must prepare a Community Health and Safety Plan for the project site if no such plan exists. The Ninyo & Moore Environmental Conditions/Hazards Report, included as Appendix H to this PEIR, shall be reviewed to determine if a Master Community Health and Safety Plan has already been prepared for the site. The Community Health and Safety Plan shall address field procedures, anticipated contaminants on the project site, and established action levels for exposure to contaminants; and provide contingency plans for emergencies that may arise during fieldwork that may encounter hazardous materials. The Community Health and Safety Plan shall be prepared in general accordance with the current DEH Site Assessment and Mitigation Manual Guidelines. If a Master Community Health and Safety Plan has been prepared for the site, it shall be reviewed to determine if regulatory agency notifications of project-specific activities or monitoring are required. The Community Health and Safety Plan shall be implemented by the District during activities that may encounter existing hazardous materials to ensure the public and surrounding properties were protected from potential health and environmental hazards during these activities and indicate that unacceptable community exposure to adverse conditions did not occur during these activities.<br><br>For **Impact-HAZ-5:**<br>**MM-HAZ-8: Prepare a Munitions Response Plan for Existing District Sites.** For work occurring within any of the 14 schools located within the known Formerly Used Defense Site (FUDS) identified | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | in Table 4.8-3, the following procedures shall be implemented to ensure safety for all students, staff, and contractors working in these areas:<br>• Preparation of a Munitions Response Plan (MRP) consistent with the District's MRP template (see Appendix H) shall be required for the 14 identified schools located within the known FUDS areas. The purpose of the MRP is to outline the procedures that must take place in the event an unexploded ordnance is discovered during ground-disturbing activities.<br>• An unexploded ordnance (UXO) awareness briefing shall be conducted for all District staff and contractors who will be involved in any ground disturbance at any of the 14 identified schools shown in Table 4.8-5. The awareness briefings shall be completed prior to the start of ground-disturbing activities. Any new personnel shall be trained prior to beginning work on site. See Appendix H for a sample briefing.<br>• Any ground disturbance at schools located within the Rosedale and Linda Vista FUDS areas shall require a preconstruction survey of the area to be disturbed by a qualified UXO technician using a magnetometer, ground penetrating radar, or other appropriate equipment, to locate any potential hazards. The preconstruction survey is meant as a preliminary tool to assess the risk of UXO presence and shall not be used to provide UXO clearance for ground-disturbing activities. All construction-related ground-disturbing activity into native and nonnative soils shall require a UXO technician be present.<br>• Monitoring shall be performed during ground disturbance at any school site where the | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | preconstruction survey identified the presence of a UXO or other hazard. Monitoring shall be conducted by a qualified UXO technician. | |
| | *Operation:*<br>Operation of Whole Site Modernization; Upgrades of Existing School and Administrative Sites; and Joint Use Facilities Development Including Fields, Pools, and Play All Day Program would not result in impacts associated with significant hazards to the public or the environment due to reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. | Less than Significant | No mitigation is required. | *Operation:*<br>Less than Significant |
| Near-Term, Site-Specific Whole Site Modernization | *Construction:*<br>**Impact-HAZ-3,** as described above.<br><br>**Impact-HAZ-4,** as described above.<br><br>**Impact-HAZ-6: Encounter Contamination or Munitions at Madison High School During Ground-Disturbing Activities.** Because Madison High School is located within the Rosedale Formerly Used Defense Site (FUDS) area, ground-disturbing activities could encounter potential contamination or munitions from unexploded ordnance (UXO), munitions debris (MD), or munitions and explosives of concern (MECs). This could result in | Potentially Significant | For **Impact-HAZ-3** and **Impact-HAZ-4:**<br>Implement **MM-HAZ-3** through **MM-HAZ-7**, as described above.<br><br>For **Impact-HAZ-6:**<br>Implement **MM-HAZ-8,** as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | a significant hazard to the public or the environment. This is a potentially significant impact. | | | |
| | *Operation:*<br>Operation would not involve ground-disturbing activities that would have the possibility of encountering hazardous materials listed on an environmental database. Therefore, operations would not result in a significant hazard to the public or the environment due to reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| *Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:*<br>**Impact-HAZ-1**, as described above. | Potentially Significant | Implement **MM-HAZ-1**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>Operation of new school or administrative facilities would not result in impacts associated with significant hazards to the public or the environment due to being located on a site that is listed on a hazardous materials database pursuant to Government Code Section 65962.5. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Whole Site Modernization; Upgrades of Existing School or Administrative Sites; and Joint Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact-HAZ-3**, as described above. | Potentially Significant | Implement **MM-HAZ-3** through **MM-HAZ-7**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>Operation of new school or administrative facilities would not result in impacts associated with significant hazards to the public or the environment due to being located on a site that is listed on a hazardous materials database pursuant to Government Code Section 65962.5. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization | *Construction:*<br>**Impact-HAZ-3,** as described above | Potentially Significant | Implement **MM-HAZ-3** through **MM-HAZ-7**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>Operations associated with near-term, site-specific whole site modernization projects would not exacerbate existing hazardous conditions associated with being listed on a hazardous materials database as part of the Cortese list, and would not result in a significant impact. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| *Be located within an airport land use plan or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard or excessive noise for people residing or working within the vicinity of the project area.* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction and Operation:*<br>**Impact-HAZ-7: Interfere with Federal Aviation Administration Communication.** Proposed projects located within the Federal Aviation Administration Notification overlay | Potentially Significant | For **Impact-HAZ-7**:<br>**MM-HAZ-9: Ensure Federal Aviation Administration Notification of Proposed Construction or Alteration.** During project design, the District shall comply with the requirements of 14 Code of Federal Regulations 77 Notification Criteria | *Construction and Operation:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | for nearby airports could introduce elements that could interfere with the safe operation of aircraft or air navigation facilities, due to the height of structures or construction equipment. This could result in a safety hazard for the people living or working within the vicinity of the proposed project site. This is a potentially significant impact.<br><br>**Impact-HAZ-8: Conflict with Regulations Applicable to Review Area 1.** Future proposed projects located within Review Area 1 for nearby airports could result in a conflict with Airport Land Use Compatibility Plan (ALUCP) regulations regarding land use projects in the vicinity of the airport. This could result in a safety hazard for the people living or working within the vicinity of the proposed project site. This is a potentially significant impact.<br><br>**Impact-HAZ-9: Conflict with Regulations Applicable to Review Area 2.** Future proposed projects located within Review Area 2 could propose structures, construction equipment, or other project elements that would conflict with Airport Land Use Compatibility Plan (ALUCP) regulations regarding land use projects within Review Area 2. This | | for proposed construction or alteration of objects exceeding certain heights or that could potentially interfere with navigational aids by submitting Form 7460-1 to the Federal Aviation Administration (FAA) for review and approval. Regardless of location, the District shall notify the FAA of proposed structures or objects (including construction cranes) exceeding 200 feet above ground level. If conditions of approval are issued by the FAA upon review, the District shall comply with all conditions.<br><br>For **Impact-HAZ-8**:<br>**MM-HAZ-9: Ensure Airport Land Use Commission Review and Approval for Review Area 1.** During project design, the District shall submit a consistency application for Airport Land Use Commission (ALUC) review for all projects located within Review Area 1. The ALUC shall make a consistency determination as to whether the project is compatible with Airport Land Use Compatibility Plan (ALUCP) noise and safety compatibility policies, and whether the project requires Federal Aviation Administration (FAA) review or is determined by the FAA not to be a hazard or obstruction to air navigation. The District shall include the FAA notice of determination (**MM-HAZ-9**) with the ALUC consistency application.<br><br>For **Impact-HAZ-9**:<br>**MM-HAZ-11: Ensure Airport Land Use Commission Review and Approval for Review Area 2.** Prior to project design, the District shall submit a consistency application for Airport Land Use Commission (ALUC) review for land use projects located within Review Area 2 if they propose | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | could result in a safety hazard for the people living or working within the vicinity of the airport. This is a potentially significant impact. | | increases in height limits compared to existing structures, or for projects that:<br>• Have received a Notice of Presumed Hazard, a Determination of Hazard, or a Determination of No Hazard subject to conditions, limitations, or marking and lighting requirements, from the Federal Aviation Administration (FAA); and/or<br>• Would create any of the following hazards:<br>o Glare<br>o Lighting<br>o Electromagnetic interference<br>o Dust, water vapor, and smoke<br>o Thermal plumes<br>o Bird attractants | |
| Whole Site Modernization; Upgrades of Existing School and Administrative Sites; and Joint Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact-HAZ-7**, **Impact-HAZ-8**, and **Impact-HAZ-9**, as described above. | Potentially Significant | For **Impact-HAZ-7**:<br>Implement **MM-HAZ-9**, as described above.<br><br>For **Impact-HAZ-8**:<br>Implement **MM-HAZ-10**, as described above.<br><br>For **Impact-HAZ-9**:<br>Implement **MM-HAZ-11**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>Operations associated with whole site modernization, upgrades of existing school and administrative sites, and joint use facilities projects would not result in impacts associated with a safety hazard or excessive noise for people residing or working in the project area due to being located within an airport land use plan area or, where such a plan | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | has not been adopted, within two miles of a public airport or public use airport. | | | |
| Near-Term, Site-Specific Whole Site Modernization | *Construction:* **Impact-HAZ-7**, **Impact-HAZ-8**, and **Impact-HAZ-9**, as described above. | Potentially Significant | For **Impact-HAZ-7**: Implement **MM-HAZ-9**, as described above.<br><br>For **Impact-HAZ-8**: Implement **MM-HAZ-10**, as described above.<br><br>For **Impact-HAZ-9**: Implement **MM-HAZ-11**, as described above. | *Construction:* Less than Significant |
| | *Operation:* Implementation of near-term, site-specific whole site modernization projects would not result in potentially significant impacts. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| **4.9 Hydrology/Water Quality** | | | | |
| *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:* **Impact-HWQ-1: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of New School or Administrative Facilities.** Construction activities associated with the with new school or administrative facilities could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact. | Potentially Significant | **MM-HWQ-1: Implement Construction Best Management Practices.** Prior to the onset of any construction activities affecting over 1 acre of land, the District shall obtain coverage under the National Pollutant Discharge Elimination System Construction General Permit, as issued by the San Diego Regional Water Quality Control Board. The District shall be responsible for ensuring that construction activities comply with the conditions in this permit, including development of a Stormwater Pollution Prevention Plan (SWPPP), implementation of Best Management Practices (BMPs) identified in the SWPPP, and monitoring (as required) to ensure that effects on water quality are minimized. As part of this process, the District shall implement multiple erosion and sediment control BMPs in areas with the potential to | *Construction:* Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | drain to surface water. Guidelines established in the City of San Diego Jurisdictional Runoff Management Plan or equivalent guidelines shall be followed in selecting, implementing, and monitoring BMPs for construction activities. The District shall verify that a notice of intent has been submitted to the State Water Resources Control Board and a SWPPP has been completed before allowing construction to begin.<br>Prior to the onset of any construction activities under 1 acre, the District shall prepare a BMP Plan that identifies implementation of best management practices to ensure that effects on water quality are minimized. As part of this process, the District shall implement multiple erosion and sediment control BMPs in areas with the potential to drain to surface water. | |
| | *Operation:*<br>**Impact-HWQ-2: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of New School or Administrative Facilities.** Operation activities associated with new school or administrative facilities could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact. | Potentially Significant | **MM-HWQ-2: Implement Low Impact Development Features and Post-Construction Best Management Practices.** The District shall complete the City of San Diego's Storm Water Requirements Applicability Checklist (Form DS-560) to determine if the project is a Priority Development Project (PDP), Standard Development Project (SDP), or Exempt and to determine which stormwater requirements apply. Per the City of San Diego's National Pollutant Discharge Elimination System Municipal Permit and Jurisdictional Runoff Management Plan, the District shall implement the applicable stormwater Best Management Practices (BMP) into project building and grading plans. The Jurisdictional Runoff Management Plan (JRMP) dictates installation of which post-construction best management practices to implement to prevent pollutants from entering the storm drainage system. The JRMP requirements may include, but are not | *Operation:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | limited to, minimum source control BMP requirements and site design Low Impact Development (LID) requirements for all projects regardless of the size and for PDPs to incorporate pollutant control BMPs and hydromodification management BMPs. | |
| Whole Site Modernization | *Construction:* **Impact-HWQ-3: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:* Less than Significant |
| | *Operation:* **Impact-HWQ-4: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of Whole Site Modernization Projects.** Operation activities associated with whole site modernization projects could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:* Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Upgrades of Existing School and Administrative Sites | *Construction:*<br>Construction associated with upgrades of existing school and administrative sites would not result in a violation of a water quality standard or waste discharge requirement during construction activities, with implementation of construction BMPs as needed. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operational activities associated with upgrades of existing school and administrative sites would not result in a violation of a water quality standard or WDR with implementation of operational BMPs as needed. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact-HWQ-5: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of Joint-Use Facilities.** Construction activities associated with joint-use facilities could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>**Impact-HWQ-6: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of Joint-Use Facilities.** Operation activities | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | associated with joint-use facilities could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact. | | | |
| Near-Term, Site-Specific Whole Site Modernization | *Construction:* **Impact-HWQ-3,** as described above. | Potentially Significant | Implement **MM-HWQ-1,** as described above. | *Construction:* Less than Significant |
| | *Operation:* **Impact-HWQ-4,** as described above. | Potentially Significant | Implement **MM-HWQ-4,** as described above. | *Operation:* Less than Significant |
| *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin* | | | | |
| All Project Categories | *Construction:* Construction activities associated with all project categories would not 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 | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operational activities associated with all project categories would not 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 | No mitigation is required. | *Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Near-Term, Site-Specific Whole Site Modernization | *Construction and Operation:* Construction and operation of near-term, site-specific whole site modernization projects would result in less-than-significant impacts prior to mitigation. | Less than Significant | No mitigation is required. | *Construction and Operation:* Not Applicable |
| *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:* a. *Result in substantial erosion or siltation on or off site;* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:* **Impact-HWQ-7: Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of New Acquisition and New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction*: Less than Significant |
| | *Operation:* **Impact-HWQ-8: Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of New Acquisition and New School or Administrative Facilities.** Operational activities associated with new school or | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation*: Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | administrative facilities could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact. | | | |
| Whole Site Modernization | *Construction:*<br>**Impact-HWQ-9: Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>**Impact-HWQ-10: Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of Whole Site Modernization Projects.** Operation activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Upgrades of Existing School and Administrative Sites | *Construction:*<br>Construction activities associated with upgrades of existing school and administrative sites would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on or off site. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation*:<br>Operation of upgrades of existing school and administrative sites would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on or off site. | Less than Significant | No mitigation is required. | *Operation*:<br>Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact-HWQ-11: Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of Joint-Use Facilities.** Construction activities associated with joint-use facilities could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | *Operation:*<br>**Impact-HWQ-12: Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of Joint-Use Facilities.** Operation activities associated with joint-use facilities could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:*<br>Less than Significant |
| Near-Term, Site-Specific Whole Site Modernization | *Construction:*<br>**Impact-HWQ-9,** as described above. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>**Impact-HWQ-10,** as described above. | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:*<br>Less than Significant |
| *b.* | *Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; or* | | | |
| *d.* | *Impede or redirect flood flows.* | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:*<br>**Impact-HWQ-13: Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could alter the existing drainage pattern of the site or area, and could result in substantial flooding on or off site or | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | impede or redirect flood flows. This is a potentially significant impact. | | | |
| | *Operation:*<br>**Impact-HWQ-14: Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of New School or Administrative Facilities.** Operation activities associated with new school or administrative facilities could alter the existing drainage pattern of the site or area, and could result in substantial flooding on or off site or impede or redirect flood flows. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:*<br>Less than Significant |
| Whole Site Modernization | *Construction:*<br>**Impact-HWQ-15: Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could result in substantial flooding on or off site or impede or redirect flood flows. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>**Impact-HWQ-16: Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of** | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | **Whole Site Modernization Projects.** Operation activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could result in substantial flooding on or off site or impede or redirect flood flows. This is a potentially significant impact. | | | |
| Upgrades of Existing School and Administrative Sites | *Construction:* Construction activities associated with upgrades of existing school and administrative facilities would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site or impede or redirect flood flows. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation of upgrades of existing school and administrative facilities would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | on or off site or impede or redirect flood flows. | | | |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>Construction activities associated with joint-use facilities would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site or impede or redirect flood flows. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | Operation:<br>**Impact-HWQ-17: Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of Joint-Use Facilities.** Operation activities associated with joint-use facilities could alter the existing drainage pattern of the site or area, and could result in substantial flooding on or off site or impede or redirect flood flows. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:*<br>Less than Significant |
| Near-Term, Site-Specific Whole Site Modernization | *Construction:*<br>**Impact-HWQ-15,** as described above. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | *Operation:*<br>**Impact-HWQ-16,** as described above. | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:*<br>Less than Significant |
| *c. 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.* | | | | |
| New Acquisition and New School or Administrative Facilities | Construction:<br>**Impact-HWQ-18: Potential for New School and Administrative Facilities to 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 During Construction.** Construction activities associated with new acquisition and new school or administrative facilities projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>**Impact-HWQ-19: Potential for New School and Administrative Facilities to Create or Contribute Runoff Water That Would Exceed the Capacity of Existing or Planned Stormwater Drainage Systems or Provide Substantial Additional** | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | **Sources of Polluted Runoff During Operation.** Operation activities associated with new acquisition and new school or administrative facilities projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact. | | | |
| Whole Site Modernization | *Construction:*<br>**Impact-HWQ-20: Potential for Whole Site Modernization Projects to 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 During Construction.** Construction activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | *Operation:*<br>**Impact-HWQ-21: Potential for Whole Site Modernization Projects to 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 During Operation.** Operation activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:*<br>Less than Significant |
| Upgrades of Existing School and Administrative Sites | *Construction:*<br>Construction activities associated with upgrades of existing school and administrative sites would not result in alteration of existing drainage patterns during construction, which could exceed stormwater drainage system capacities or provide substantial sources of additional pollutants. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operational activities associated with upgrades of existing school and administrative sites would not result | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | in alteration of existing drainage patterns during operation, which could exceed stormwater drainage system capacities or provide substantial sources of additional pollutants. | | | |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact-HWQ-22: Potential for Joint-Use Facilities to 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 During Construction.** Construction activities associated with joint-use facilities projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation:*<br>**Impact-HWQ-23: Potential for Joint-Use Facilities to 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 During Operation.** | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | Operation activities associated with joint-use facilities projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact. | | | |
| Near-Term, Site-Specific Whole Site Modernization | *Construction:* **Impact-HWQ-20,** as described above. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:* Less than Significant |
| | *Operation:* **Impact-HWQ-21,** as described above. | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:* Less than Significant |
| *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation* | | | | |
| All Project Categories | *Construction and Operation:* Construction activities associated with and operation of the Proposed Program would not risk the release of pollutants due to project inundation within a flood hazard, tsunami, or seiche zone. | Less than Significant | No mitigation is required. | *Construction and Operation:* Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization | *Construction and Operation:* Construction and operational activities associated the near-term, site-specific whole site modernization projects would not risk the release of pollutants due to project inundation within a flood hazard, tsunami, or seiche zone. | Less than Significant | No mitigation is required. | *Construction and Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:* **Impact-HWQ-1,** as described above. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:* Less than Significant |
| | *Operation:* **Impact-HWQ-2,** as described above. | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:* Less than Significant |
| Whole Site Modernization | *Construction:* **Impact-HWQ-3,** as described above. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:* Less than Significant |
| | *Operation:* **Impact-HWQ-4,** as described above. | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:* Less than Significant |
| Upgrades of Existing School and Administrative Sites | *Construction:* Construction activities associated with upgrades of existing school and administrative facilities would not result in a violation of a water quality standard or WDR during construction activities, with implementation of construction BMPs as needed. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operations following upgrades of existing school and administrative facilities would not result in a violation of a water quality standard with implementation of post-construction BMPs as needed. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Joint-Use Facilities | *Construction:* **Impact-HWQ-5,** as described above. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:* Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Development Including | *Operation:*<br>**Impact-HWQ-6,** as described above. | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:*<br>Less than Significant |
| Near-Term, Site-Specific Whole Site Modernization | *Construction***:**<br>**Impact-HWQ-3,** as described above. | Potentially Significant | Implement **MM-HWQ-1**, as described above. | *Construction:*<br>Less than Significant |
| | *Operation*:<br>**Impact-HWQ-4,** as described above. | Potentially Significant | Implement **MM-HWQ-2**, as described above. | *Operation:*<br>Less than Significant |
| **4.10 Noise and Vibration** | | | | |
| *Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies.* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:*<br>**Impact-NOI-1: Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of New School or Administrative Facilities.** Noise levels due to various construction activities (phases) associated with new school or administrative facilities could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level (Leq) at residences or other offsite noise-sensitive receptors. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13. (Actual impact distances could be shorter depending on site-specific details such as ground | Potentially Significant | For **Impact-NOI-1:**<br>**MM-NOI-1: Conduct Site-Specific Reviews of Noise Impacts and, if Warranted, Conduct Additional Analyses.** Once individual project (i.e., site-specific) plans are available, an acoustical consultant shall be retained by the District to review noise impacts against the identified screening criteria, prior to implementation of further mitigation measures. If impacts are confirmed, then no further analysis is required, and the project may proceed with implementation of the relevant mitigation measures described in this PEIR. However, at the District's discretion, new or more detailed analysis may be conducted in order to clarify site-specific impacts. These analyses may indicate that significant impacts will not, in fact, occur. In such cases, the acoustical consultant shall indicate which mitigation measure(s) are no longer required, and the District may modify or eliminate those measure(s) from the project accordingly at the approval of the project. The analysis and findings should be documented by | *Construction:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | conditions and the presence of any acoustical screening.) This is a potentially significant impact.<br><br>**Impact-NOI-2: Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to New School or Administrative Facilities.** Noise levels due to various construction activities (phases) associated with new school or administrative facilities could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level (Leq) at onsite learning spaces (classrooms, libraries, etc.) while occupied by students for academic purposes. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13 of occupied onsite learning spaces. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact. | | the acoustical consultant in a memorandum or technical report.<br><br>**MM-NOI-2: Prohibit Exterior Construction Activities Outside of the City of San Diego's Permitted Construction Hours**. During construction of the project, the District shall require all contractors to limit exterior construction activities, including material or equipment deliveries and collections, to the hours of 7 a.m. to 7 p.m. on weekdays and Saturdays, with no such work at any time on Sundays or legal holidays. Except for construction personnel specifically working on interior construction tasks, construction personnel shall not be permitted on the job site outside of the permitted exterior construction hours.<br><br>**MM-NOI-3: Avoid Construction Within the Calculated Screening Distances of Noise-Sensitive Receptors.** During construction of the project, the District shall require all contractors to maintain adequate clearance from noise-sensitive offsite receptors based on the appropriate screening distance for each phase of construction, as identified in Tables 4.10-11 and 4.10-13.<br><br>**MM-NOI-4: Implement General Best Practices for Construction Noise Abatement.** During construction of the project, the District shall require all contractors to adhere to the following noise abatement measures:<br>• All construction equipment and vehicles using internal combustion engines will be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | other noise-reducing features in good operating condition that meet or exceed original factory specification.<br>• All mobile or fixed construction equipment used on the project that is regulated for noise output by a local, state, or federal agency will comply with such regulation while in the course of proposed project activity.<br>• All construction equipment will be properly maintained and serviced.<br>• All construction equipment will be operated only when necessary and will be switched off when not in use.<br>• Construction employees will be trained in the proper operation and use of the equipment to avoid careless or improper operation of equipment that could increase noise levels.<br>• Electrically powered equipment will be used instead of pneumatic or internal combustion powered equipment, where feasible.<br>• Material stockpiles and mobile equipment staging, parking, and maintenance areas will be located as far as practicable from noise-sensitive receptors.<br>• Construction site speed limits will be established and enforced during the construction period.<br>• The use of noise-producing signals, including horns, whistles, alarms, and bells, will be for safety warning purposes only.<br>• The contractor will provide advance written notification of construction activities to residences around the construction site. Notification will include a brief overview of the proposed construction activity and its purpose and schedule. It also will include the name and | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | contact information of the project manager or representative responsible for resolving any noise concerns.<br><br>**MM-NOI-5: Install Temporary Noise Barriers to Shield Noise-Sensitive Receptors from Excessive Construction Noise Levels.** During construction of the project, the construction contractor shall install temporary noise barrier(s) between construction activities and noise-sensitive receptor(s) where noise levels are anticipated to exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$). The barriers shall be constructed as follows:<br>• The minimum height of the barriers will be 8 feet above ground level.<br>• The barriers will be positioned to block the line-of-sight between the construction equipment and the receiver.<br>• The barriers will be constructed from acoustical blankets hung over or from a supporting frame.<br>• The blankets will provide a minimum sound transmission class (STC) rating of 28.<br>• The blankets will be overlapped by at least 4 inches at seams and taped and/or closed with hook-and-loop fasteners (i.e., Velcro®) so that no gaps exist.<br>• The largest blankets available should be used to minimize the number of seams.<br>• The blankets will be draped to the ground to eliminate any gaps at the base of the barrier.<br><br>**MM-NOI-6: Avoid or Reduce Construction Noise from Pile Driving**. During construction activities, the District and its construction contractor shall take steps to reduce pile driving noise, if any, associated | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | with the project. Possible noise reduction methods may include, but are not limited to, the following:<br>• Avoiding impact pile driving by using quieter alternative installation methods, such as press-in piles or drilled piles (e.g., cast-in-drilled-hole, poured-in-place piles).<br>• Using an acoustical shroud around impact pile driving. The shroud shall be constructed of materials that provide a minimum STC of 28 (examples include sound-rated acoustical blankets).<br><br>For **Impact-NOI-2:**<br>Implement **MM-NOI-1**, and **MM-NOI-3** through **MM-NOI-6**.<br><br>**MM-NOI-7: Coordinate Construction Activities to Avoid or Minimize Excessive Noise at Occupied Onsite Learning Spaces.** During construction activities, the District shall coordinate with all contractors to avoid excessive noise at occupied onsite learning spaces. Such coordination may include, but is not limited to, the following:<br>• Identifying days and times when school buildings or exterior facilities would be used for sensitive learning activities and maximizing the separation between these areas and construction equipment and heavy vehicles.<br>• Relocating sensitive learning activities to alternative classrooms or other spaces away from heavy construction activities.<br>• Shortening the construction work day and/or altering start and stop times to avoid particularly sensitive time periods such as student testing and exams. | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | • Scheduling interior construction and renovation work to occur outside of school hours, including at nighttime if necessary. | |
| | *Operation:*<br>**Impact-NOI-3: Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips at New School or Administrative Facilities.** Vehicle trips generated by new school or administrative facilities have the potential to cause a traffic noise increase of 3 decibels (dB) Community Noise Equivalent Level (CNEL) or more that would result in a noise level greater than 65 dB CNEL at an offsite residence, hospital, nursing facility, intermediate care facility, school, day care, library, hotel, motel, or park, or 70 dB CNEL at an offsite church or museum. This is a potentially significant impact.<br><br>**Impact-NOI-4: Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code During Operation of New** | Potentially Significant | For **Impact-NOI-3:**<br>**MM-NOI-8: Conduct a Traffic Noise Analysis to Quantify the Traffic Effects of New District Sites.** During project-specific CEQA evaluations, in order to clarify the potential for substantial increases in traffic noise, the District shall retain a qualified traffic consultant to conduct analyses to quantify existing daily traffic volumes on the roadways surrounding the site as well as the anticipated increase in these traffic volumes as a result of the proposed project.<br><br>**MM-NOI-9: Plan Access Routes for New District Sites to Avoid Noise-Sensitive Land Uses and/or Encourage Use of Major Arterials as Opposed to Smaller Local Streets.** If site-specific traffic analysis indicates that substantial increases in daily traffic could occur then, where compatible with safety or other critical requirements, the District shall design ingress and egress at new facilities to encourage vehicle trips to utilize routes that avoid residential streets or other roadways adjacent to noise-sensitive receptors. Where such routes cannot be avoided, the District shall design site access to encourage trips along major roadways where the relative effect of increased traffic would be less noticeable.<br><br>For **Impact-NOI-4**:<br>**MM-NOI-10: Apply Administrative Controls and Incorporate Public Address System Design Features to Reduce Operational Noise Levels During All Use (School and Joint Use) of Any New** | *Operation:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | **School or Administrative Facilities.** Operation of new school or administrative facilities have the potential to cause a noticeable increase (3 decibels or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code. This is a potentially significant impact. | | **or Redesigned Major Athletic Facilities.** During project planning and design phases, the District shall implement the following measures to control operational noise levels from new or redesigned major athletic facilities such as stadiums, large fields with bleacher seating and Public Address (PA) systems, or aquatic facilities with bleacher seating and PA systems. These measures shall apply to both District use and any use as part of a joint/community use agreement.<br>• The use of noise-generating equipment (bullhorns/megaphones, air horns, rattles, etc.) by spectators will be prohibited at all times.<br>• Use of the facilities for any noise-generating activity, excluding morning practice, will be prohibited from dusk until dawn each day, and shall not occur at any time before 7 a.m. or after 10 p.m. on any day.<br>• The proposed project will incorporate the following design features into the PA system that will be installed at the athletic field:<br>  ○ All speakers installed on the loudspeaker poles will have defined coverage patterns and be mounted in a way that the aiming of speakers can be adjusted at the time of installation both vertically and horizontally to maximize control of sound coverage.<br>  ○ The aiming point of each loudspeaker (or loudspeaker cluster) will be individually adjusted to fit the minimal area of coverage to maximize the sound levels for the spectators and minimize the bleed over into the adjacent areas.<br>  ○ Each loudspeaker cluster type will have independent parametric equalization and | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | amplification control, allowing individual adjustment of frequency content and sound levels. In addition, the audio system will be programmed to provide compression and limiting that will control the maximum sound output level.<br>o The field, home bleachers, and visitor bleachers speaker systems will be designed to allow for independent activation via local control. This will allow for use of all speakers or a portion of the speakers depending on the needs of the event.<br>o Connection to an audio mixer will be provided with the system to adjust inputs and microphones and control the levels.<br>o The overall system volume will be adjusted and the maximum output will be limited to prevent additional amplification by end users.<br><br>**MM-NOI-11: Design and Install All New or Substantially Altered Mechanical Systems to Ensure All Mechanical Equipment Complies with Section 59.5.0401 of the City of San Diego Municipal Code at Nearby Noise-Sensitive Receptors.** During the architectural and engineering design phases of the project, and prior to the issuance of any building permits for the school buildings, an acoustical consultant shall be retained by the District to evaluate the mechanical system design and provide recommendations, as necessary, to ensure that exterior noise levels comply with the City's Municipal Code noise limits at nearby noise-sensitive land uses. Such recommendations may include, but are not limited to, the selection of | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | quieter mechanical units, changes in unit locations, changes to rooftop parapet walls, and acoustical louvers or screens.<br><br>**MM-NOI-12: Design and Develop All Other New, Expanded, or Relocated Exterior Noise Sources so that Operational Noise Does Not Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use Resulting in an Exceedance of Section 59.5.0401 of the City of San Diego Municipal Code.** During the architectural and engineering design phases of the proposed project, and prior to the issuance of any building permits for the school buildings, an acoustical consultant shall be retained by the District to evaluate the potential noise impacts of ancillary outdoor noise sources such as new parking lots and playgrounds. The consultant shall assess the proposed project details and determine what, if any, additional analysis is required to quantify operational noise levels and potential noise control measures. Based on the consultant's professional experience, the assessment may range from a cursory review to detailed technical analysis. Noise control measures, if required, may include, but are not limited to, reorientation or relocation of noise sources, administrative controls on the times and intensity of use, or the addition of noise barriers or other acoustical screening. | |
| Whole Site Modernization | *Construction:*<br>**Impact-NOI-5: Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During** | Potentially Significant | For **Impact-NOI-5**:<br>Implement **MM-NOI-1** through **MM-NOI-6**, as described above.<br><br>For **Impact-NOI-6**: | *Construction:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | **Construction of Whole Site Modernization Projects.** Noise levels due to various construction activities (phases) associated with whole site modernization projects could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at residences or other offsite noise-sensitive receptors. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact. | | Implement **MM-NOI-1**, and **MM-NOI-3** through **MM-NOI-7**, as described above. | |
| | **Impact-NOI-6: Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to Whole Site Modernization Projects.** Noise levels due to various construction activities (phases) associated with whole site modernization projects could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at onsite learning spaces (classrooms, libraries, etc.) while occupied by students for academic purposes. These impacts could occur | | | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13 of occupied onsite learning spaces. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact. | | | |
| | *Operation – Traffic*<br>**Impact-NOI-7: Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips or Altered Traffic Patterns.** Increased vehicle trips on local roadways could be generated by new facilities, expanded use of existing facilities, or redirection of traffic patterns due to reconfiguration of site access and layout. These changes have the potential to cause a traffic noise increase of 3 decibels (dB) Community Noise Equivalent Level (CNEL) or more that would result in a noise level greater than 65 dB CNEL at an offsite residence, hospital, nursing facility, intermediate care facility, school, day care, library, hotel, motel, or park, or 70 dB CNEL | Potentially Significant | For **Impact-NOI-7**:<br>**MM-NOI-13: Conduct a Traffic Noise Analysis to Quantify the Traffic Effects of Redesigned Project Sites, Including New or Expanded Onsite Facilities.** During project-specific CEQA evaluations, in order to clarify the potential for substantial increases in traffic noise, the District shall retain a qualified traffic consultant to conduct analyses to quantify existing daily traffic volumes on the roadways surrounding the site, as well as the anticipated change in trip distribution and traffic volumes on these roadways as a result of the project.<br><br>**MM-NOI-14: Plan Access Routes for Redesigned Project Sites, Including New or Expanded Onsite Facilities to Avoid Substantial Traffic Increases Adjacent to Noise-Sensitive Land Uses.** If site-specific traffic analysis indicates that substantial increases in daily traffic could occur then, where compatible with safety or other critical requirements, the District shall redesign or relocate ingress and egress at existing facilities to encourage vehicle trips to utilize routes that avoid residential streets or other roadways adjacent to noise-sensitive receptors. Where such routes cannot be avoided, the | *Operation:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | at an offsite church or museum. This is a potentially significant impact.<br><br>*Operation – Onsite Noise Sources*<br>**Impact-NOI-8: Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code During Operation of an Existing District Facility.** Operation of expanded or reconfigured operations at existing facilities have the potential to cause a noticeable increase (3 decibels or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code. This is a potentially significant impact. | | District shall design site access to encourage trips along routes where the relative effect of increased traffic would be less noticeable; this could include major roadways or the roadways that currently provide primary access to the site.<br>For **Impact-NOI-8**:<br>Implement **MM-NOI-10** through **MM-NOI-12**, as described above. | |
| Upgrades of Existing School and Administrative Sites | *Construction:*<br>**Impact-NOI-9: Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction Activities Associated with Upgrades of Existing School and Administrative Sites.** Noise levels due to various construction activities (phases) associated with upgrades of existing school and administrative sites could exceed 75 A-weighted decibels (dBA) 12-hour | Potentially Significant | For **Impact-NOI-9:**<br>Implement **MM-NOI-1** through **MM-NOI-6**, as described above.<br><br>For **Impact-NOI-10:**<br>Implement **MM-NOI-1**, and **MM-NOI-3** through **MM-NOI-7**, as described above. | *Construction:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | equivalent sound level ($L_{eq}$) at residences or other offsite noise-sensitive receptors. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact. | | | |
| | **Impact-NOI-10: Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to Upgrades of Existing School and Administrative Sites.** Noise levels due to various construction activities (phases) associated with upgrades of existing school and administrative sites could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at onsite learning spaces (classrooms, libraries, etc.) while occupied by students for academic purposes. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13 of occupied onsite learning spaces. (Actual impact distances | | | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact. | | | |
| | *Operation – Traffic*<br>**Impact-NOI-7,** as described above.<br><br>*Operation – Onsite Noise Sources*<br>**Impact-NOI-8,** as described above. | Potentially Significant | For **Impact-NOI-7**:<br>Implement **MM-NOI-13** and **MM-NOI-14**, as described above.<br><br>For **Impact-NOI-8**:<br>Implement **MM-NOI-10** through **MM-NOI-12**, as described above. | *Operation:*<br>Significant and Unavoidable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact-NOI-11: Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of Joint-Use Facilities.** Noise levels due to various construction activities (phases) associated with joint-use facilities could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at residences or other offsite noise-sensitive receptors. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any | Potentially Significant | For **Impact-NOI-11**:<br>Implement **MM-NOI-1** through **MM-NOI-6**, as described above.<br><br>For **Impact-NOI-12**:<br>Implement **MM-NOI-1**, and **MM-NOI-3** through **MM-NOI-7**, as described above. | *Construction:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | acoustical screening.). This is a potentially significant impact.<br><br>**Impact-NOI-12: Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Associated with Joint-Use Facilities.** Noise levels due to various construction activities (phases) associated with joint-use facilities could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at onsite learning spaces (classrooms, libraries, etc.) while occupied by students for academic purposes. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13 of occupied onsite learning spaces. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact. | | | |
| | *Operation – Traffic*<br>**Impact-NOI-7,** as described above.<br><br>*Operation – Onsite Noise Sources*<br>**Impact-NOI-8,** as described above. | Potentially Significant | For **Impact-NOI-7:**<br>Implement **MM-NOI-13** and **MM-NOI-14**, as described above**.**<br><br>For **Impact-NOI-8**:<br>Implement **MM-NOI-10** through **MM-NOI-12**, as described above. | *Operation:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | **MM-NOI-15**: **Control Noise and Minimize Potential Annoyance from Joint-Use Facilities.** During contract development for joint-use facilities, the District shall implement into contracts and agreements the following measures to control operational noise levels from joint-use facilities other than "major athletic facilities." Operational limitations shall be incorporated into all use agreements between the District, the City, and/or groups using the fields (sports leagues, etc.).<br>• The use of noise-generating equipment (permanent or temporary public address systems, bullhorns, air horns, etc.) at the facilities will be prohibited at all times. The only exception is for the use of whistles as needed by coaches, referees, or other game officials.<br>• Use of the facilities for any noise-generating activity will be prohibited from dusk until dawn each day, and shall not occur at any time before 7 a.m. or after 10 p.m. on any day. Signs to this effect will be prominently posted at each joint-use field site.<br>• City of San Diego Parks and Recreation staff will work closely with user groups to ensure that their use of the facilities does not negatively impact neighborhoods through excessive noise.<br>• If noise complaints are received regarding the joint-use facilities, City staff shall respond during normal business hours, investigate the complaint as necessary, and undertake additional steps as needed to address the complaint. Additional steps may include, but are not limited to, the following: | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | ○ Enforcing applicable conditions of any permits under which the subject activity is conducted.<br>○ Working with user groups to avoid problematic activities or behaviors.<br>○ Imposing additional limits on hours during which particularly noisy activities can occur at the facilities.<br>○ Conducting noise measurements to confirm noise levels at sensitive receptors.<br>○ Revoking permits for user groups if they generate ongoing noise violations that cannot be remedied. | |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>I**mpact-NOI-5** and **Impact-NOI-6**, as described above. | Potentially Significant | For **Impact-NOI-5**:<br>Implement **MM-NOI-1** through **MM-NOI-6**, as described above.<br><br>For **Impact-NOI-6:**<br>Implement **MM-NOI-1** and **MM-NOI-3** through **MM-NOI-7,** as described above. | *Construction:*<br>Significant and Unavoidable |
| | *Operation – Traffic*<br>**Impact-NOI-7**, as described above.<br><br>*Operation – Onsite Noise Sources*<br>**Impact-NOI-8**, as described above. | Potentially Significant | For **Impact-NOI-7:**<br>Implement **MM-NOI-13** and **MM-NOI-14**, as described above.<br><br>For **Impact-NOI-8:**<br>Implement **MM-NOI- 10**, **MM-NOI-11,** and **MM-NOI-12**, as described above. | *Construction:*<br>Significant and Unavoidable |
| *Generation of excessive groundborne vibration or groundborne noise levels* | | | | |
| New Acquisition and New School or Administrative Facilities; and | *Construction:*<br>**Impact-NOI-13: Exceed Caltrans Guideline Criteria for Potential Building Damage During Project Construction.** Vibration levels due to | Potentially Significant | For **Impact-NOI-13:**<br>**MM-NOI-16**: **Avoid or Reduce Potentially Damaging Vibration at Nearby Buildings from Program Construction.** During construction activities, the District shall require all contractors, to | *Construction:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Whole Site Modernization | various construction activities could exceed recommended criteria for potential building damage. The actual impacts, if any, would depend on the equipment used and the distance to the affected structure(s). Specifically, a significant impact would occur if project construction occurs within one or more of the threshold distances identified in Table 4.10-16 based on the actual construction equipment to be used. This is a potentially significant impact.<br><br>**Impact-NOI-14: Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Offsite Sensitive Receptors During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential human annoyance. The actual impacts, if any, would depend on the equipment used and the distance to the affected sensitive buildings. Specifically, a significant impact would occur if project construction occurs within the "distinctly perceptible" threshold distance of an occupied sensitive building, as identified in Table 4.10-17 based on the actual construction equipment to be used. This is a potentially significant impact. | | avoid working within the potential damage threshold distances identified in Table 4.10-16 based on the construction equipment to be used and the type and condition of nearby structures. The contractor may reduce the potential impact distance through the selection of alternate construction equipment or techniques such as, but not limited to, the following.<br>• Replacing impact pile driving with press-in piles or drilled piles (e.g., cast-in-drilled-hole, poured-in-place piles).<br>• Using smaller categories of equipment, such as a Bobcat or skid steer instead of full size graders or bulldozers.<br>If these techniques cannot be fully implemented or are not sufficient to place the affected receivers outside of the applicable threshold distance, then the following additional steps shall be taken to protect buildings within the potential impact distances for construction vibration damage:<br>• The project proponent/contractor shall retain a qualified structural or geotechnical engineer to conduct preconstruction surveys of neighboring structures (including photographing and/or videotaping) to document existing building conditions for future comparison if any vibration-related damage is suspected or results from construction-related activities.<br>• Based on professional judgment and review of the specific buildings involved, the structural/geotechnical engineer may provide updated vibration thresholds and revised impact distances for potentially affected buildings.<br>• If considered appropriate by the structural/geotechnical engineer, monitoring shall be conducted during construction to check | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | **Impact-NOI-15: Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Occupied Onsite Learning Spaces During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential human annoyance. The actual impacts, if any, would depend on the equipment used and the distance to the affected sensitive buildings. Specifically, a significant impact would occur if project construction occurs within the "distinctly perceptible" threshold distance of an occupied sensitive building, as identified in Table 4.10-17 based on the actual construction equipment to be used. This is a potentially significant impact. | | for vibration-related damage during pile driving. Such monitoring may include vibration measurements obtained inside or outside of the buildings or other tests and observations deemed necessary.<br><br>For **Impact-NOI-14**:<br>**MM-NOI-17**: **Avoid or Reduce Potentially Annoying Vibration at Occupied Sensitive Offsite Buildings During Project Construction.** During construction activities, the District shall require all contractors to avoid working within the distinctly perceptible threshold distances identified in Table 4.10-17 from occupied sensitive offsite buildings, based on the construction equipment to be used. The contractor may reduce the potential impact distance through the selection of alternate construction equipment or techniques such as, but not limited to, the following.<br>• Replacing impact pile driving with press-in piles or drilled piles (e.g., cast-in-drilled-hole, poured-in-place piles).<br>• Using smaller categories of equipment, such as a Bobcat or skid steer instead of full size graders or bulldozers.<br><br>For **Impact-NOI-15:**<br>**MM-NOI-18: Avoid or Reduce Potentially Annoying Vibration at Occupied Onsite Learning Spaces During Program Construction.** During construction of the project, the District shall coordinate with all contractors to avoid excessive groundborne vibration at sensitive onsite buildings. Such coordination may include, but is not limited to, the following. | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | • Identifying days and times when school buildings would be used for sensitive learning activities and avoiding the operation of heavy construction equipment within the threshold distances identified in Table 4.10-17.<br>• Relocating sensitive learning activities to alternative classrooms or other spaces away from heavy construction activities.<br>• Shortening the construction work day and/or altering start and stop times to avoid particularly sensitive time periods such as student testing and exams | |
| | *Operation:*<br>Operation of new school and administrative facilities and whole site modernization projects would not generate excessive groundborne vibration or groundborne noise levels. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Upgrades of Existing School and Administrative Sites | *Construction:*<br>**Impact-NOI-13**, **Impact-NOI-14**, and **Impact-NOI-15**, as described above. | Potentially Significant | For **Impact-NOI-13**:<br>Implement **MM-NOI-16**, as described above.<br><br>For **Impact-NOI-14**:<br>Implement **MM-NOI-17**, as described above.<br><br>For **Impact-NOI-15**:<br>Implement **MM-NOI-18**, as described above. | *Construction:*<br>Significant and Unavoidable |
| | *Operation:*<br>Operation of upgrades of existing school and administrative sites would not generate excessive groundborne vibration or groundborne noise levels. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact-NOI-13**, **Impact-NOI-14**, and **Impact-NOI-15**, as described above. | Potentially Significant | For **Impact-NOI-13**:<br>Implement **MM-NOI-16**, as described above.<br><br>For **Impact-NOI-14**:<br>Implement **MM-NOI-17**, as described above.<br><br>For **Impact-NOI-15**:<br>Implement **MM-NOI-18**, as described above. | *Construction:*<br>Significant and Unavoidable |
| | *Operation:*<br>Operation of joint-use facilities development including fields, pools, and Play All Day program would not generate excessive groundborne vibration or groundborne noise levels. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>**Impact-NOI-13**, **Impact-NOI-14**, and **Impact-NOI-15**, as described above. | Potentially Significant | For **Impact-NOI-13**:<br>Implement **MM-NOI-16**, as described above.<br><br>For **Impact-NOI-14**:<br>Implement **MM-NOI-17**, as described above.<br><br>For **Impact-NOI-15**:<br>Implement **MM-NOI-18**, as described above. | *Construction:*<br>Significant and Unavoidable |
| | *Operation:*<br>Mechanical equipment used during operation of the near-term, site-specific whole site modernization projects, such as HVAC units and fans, could produce some perceptible vibration within the buildings at which they are installed, but such equipment would not be large enough to generate noticeable | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | groundborne vibration at offsite locations. | | | |
| *Be 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 and expose people residing or working in the project area to excessive noise levels.* | | | | |
| All Project Categories and Near-Term, Site-Specific Whole Site Modernization | *Construction and Operation:* The Proposed Program would not exacerbate any existing airport-related noise conditions, and there would be no impact. | No Impact | No mitigation is required. | *Construction:* Not Applicable |
| **4.11 Paleontological Resources** | | | | |
| *Directly or indirectly destroy a unique paleontological resource or site.* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:* **Impact-PAL-1: Potential to Disturb Buried Paleontological Resources During New Acquisition and New School or Administrative Facilities Projects.** Reasonably foreseeable construction activities associated with new acquisition and new school or administrative facilities projects have the potential to significantly affect paleontological resources as a result of any ground-disturbing activities extending 10 feet or more below existing surface grade and requiring more than 1,000 cubic yards of excavation within a high sensitivity geologic unit and/or more than 2,000 cubic yards of excavation within a moderate sensitivity geologic unit. In addition, if a new school or administrative facility site would be located on or within 100 | Potentially Significant | **MM-PAL-1: Conduct Grading and Paleontological Sensitivity Screening.**<br>1. For new acquisition and new school or administrative facilities projects, a paleontological records search should be conducted to determine (1) whether any high or moderate sensitivity geologic units underlie the project site (following City of San Diego, 2016) and (2) whether there are documented fossil collection localities present within the site or within 100 feet of the site. If either of these are answered in the affirmative, proceed to Step 2. If not, no further action is required.<br>For District facility improvement projects, consult Tables 4.11-3 to 4.11-5 presented in this report. If the existing District facility is underlain by high or moderate sensitivity geologic units or if documented fossil collection localities are present within the site or within 100 feet of the site, proceed to Step 2. If it is entirely underlain by low or no sensitivity geologic units and there | *Construction:* Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | feet of a documented fossil collection locality, any ground-disturbing activities during construction would potentially result in significant impacts on these resources regardless of depth and/or volume thresholds. This is a potentially significant impact. | | are no documented fossil collection localities nearby, no further action is required.<br>2. Compare project grading plans and the paleontological resource geographic information system (GIS) database (or paleontological records search results, for new acquisition and new school or administrative facilities projects), and project geotechnical report (if available). Determine whether the distribution of high/moderate sensitivity geologic units overlaps with construction plans, and what volume/depths will be affected. Determine whether a depth threshold other than 10 feet should be used for the project (see discussion under **Impact-PAL-2**). Otherwise, a standard depth threshold of 10 feet should be used. Based on comparison of these documents, will a high or moderate sensitivity geologic unit be affected by construction of the project? If yes, proceed to Step 3. If no (e.g., only artificial fill will be affected), no further action is required.<br>3. Determine whether volume and project-specific depth thresholds will be exceeded during project construction. Volume thresholds are greater than 1,000 cubic feet in areas underlain by high sensitivity geologic units and greater than 2,000 cubic feet in areas underlain by moderate sensitivity geologic units. The project-specific depth threshold was determined in Step 2. If both volume and depth thresholds for a project will be exceeded, **MM-PAL-2** should be implemented. If not, no further action is required. | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | **MM-PAL-2: Conduct Paleontological Monitoring in Areas of High or Moderate Sensitivity.**<br>Where the above screening (**MM-PAL-1**) indicates that project construction would result in significant impacts on paleontological resources, **MM-PAL-2** shall be implemented to reduce these potential impacts to less-than-significant levels. Specifically, the District and/or its construction supervisor shall ensure the following measures are implemented:<br>• A qualified paleontologist shall be retained to oversee the mitigation program.<br>  ○ A qualified paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or geology who is familiar with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology of San Diego County, and who has worked as a paleontological mitigation project supervisor in the county for at least 1 year.<br>In addition, a regional fossil repository shall be designated to receive any discovered fossils.<br>  ○ A fossil repository is defined as a scientific institution with permanent paleontological collections. Because the District lies within San Diego County, the recommended repository is San Diego National History Museum.<br>• The qualified paleontologist shall attend the preconstruction meeting to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues.<br>• A paleontological monitor (working under the direction of the qualified paleontologist) shall be | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | on site on a full-time basis during initial excavation activities that are anticipated to affect high or moderate paleontological sensitivity geologic units to inspect exposures for contained fossils. The project-specific depth threshold should be used to determine where monitoring is required.<br>○ A paleontological monitor is defined as an individual selected by the qualified paleontologist who has experience in the collection and salvage of fossil materials.<br>Paleontological monitoring may be reduced (e.g., to part-time monitoring or spot-checking) or eliminated at the discretion of the qualified paleontologist and in consultation with appropriate agencies. Changes to the paleontological monitoring schedule shall be based on the results of the mitigation program as it unfolds during site development, and actual and anticipated conditions in the field.<br>• If fossils are discovered, the qualified paleontologist (or paleontological monitor) shall recover them and temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner.<br>• Fossil remains collected during the monitoring and salvage portion of the mitigation program shall be cleaned, repaired, sorted, and catalogued.<br>• Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in the designated fossil repository. Donation of the fossils shall be accompanied by financial support for initial | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | specimen storage, paid for by the project proponent.<br>Within 90 days of the completion of all ground-disturbing construction activities and fossil preparation and curation work (if fossils are discovered), a final paleontological mitigation report shall be completed by the qualified paleontologist that summarizes the results of the mitigation program. This report shall include discussions of the methods used and stratigraphic section(s) exposed, as well as fossils collected and significance of recovered fossils (if fossils are discovered and recovered). | |
| | *Operation:*<br>Operational activities associated with new acquisition and new school or administrative facilities would not involve ground-disturbing activities and would result in no impacts on paleontological resources. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Whole Site Modernization and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>**Impact-PAL-2: Potential to Disturb Buried Paleontological Resources During Construction of Whole Site Modernization and Joint-Use Facilities Development Projects.** Reasonably foreseeable construction activities associated with whole site modernization and joint-use facilities development projects have the potential to significantly affect paleontological resources as a result of any ground-disturbing activities exceeding the appropriate depth threshold (less than 10 feet for sites | Potentially Significant | For **Impact-PAL-2** and **Impact-PAL-3:**<br>Implement **MM-PAL-1** and **MM-PAL-2**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | where previously undisturbed strata been exposed by prior grading of the site, more than 10 feet for sites containing artificial fill to depths of greater than 10 feet, or when project-specific documentation/evidence [i.e., geotechnical reports, etc.] indicate a different depth threshold should be applied such as when surficial resources may exist) requiring more than 1,000 cubic yards of excavation within a high sensitivity formation and/or more than 2,000 cubic yards of excavation within a moderate sensitivity formation. This is a potentially significant impact.<br><br>**Impact-PAL-3: Potential to Disturb Fossil Collection Localities During Construction.** Reasonably foreseeable ground-disturbing construction activities associated with District facility improvement projects have the potential to significantly affect paleontological resources when the project is located on or within 100 feet of a documented fossil collection locality. This is a potentially significant impact. | | | |
| | *Operation:*<br>Operational activities following whole site modernization or joint-use facilities development projects would | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | not involve ground-disturbing activities and would result in no impacts on paleontological resources. | | | |
| Upgrades of Existing School and Administrative Sites | *Construction:*<br>**Impact-PAL-3**, as described above. | Potentially Significant | Implement **MM-PAL-2**, as described above | *Construction:*<br>Less than Significant |
| | *Operation:*<br>Operations associated with upgrades of existing school and administrative facilities would not directly or indirectly destroy unique paleontological resources or fossil collection localities. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site-Specific, Whole Site Modernization Projects | *Construction:*<br>**Impact-PAL-4: Potential to Disturb Buried Paleontological Resources During Construction of Near-Term, Site-Specific Whole Site Modernization Projects.**<br>Reasonably foreseeable construction activities associated with near-term, site-specific whole site modernization projects have the potential to significantly affect paleontological resources as a result of any ground-disturbing activities exceeding the appropriate depth threshold (less than 10 feet for sites where previously undisturbed strata have been exposed by prior grading of the site, more than 10 feet for sites containing artificial fill to depths of greater than 10 feet, or when project-specific documentation/evidence [i.e., geotechnical reports, etc.] | Potentially Significant | For **Impact-PAL-4** and **Impact-PAL-5:**<br>Implement **MM-PAL-1** and **MM-PAL-2**, as described above. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | indicate a different depth threshold should be applied such as when surficial resources may exist) requiring more than 1,000 cubic yards of excavation within a high sensitivity formation and/or more than 2,000 cubic yards of excavation within a moderate sensitivity formation. This is a potentially significant impact.<br><br>**Impact-PAL-5: Potential to Disturb Fossil Collection Localities During Construction of Near-Term, Site-Specific Whole Site Modernization projects.** Reasonably foreseeable ground-disturbing construction activities associated with near-term, site-specific whole site modernization projects have the potential to significantly affect paleontological resources when the project is located on or within 100 feet of a documented fossil collection locality. This is a potentially significant impact. | | | |
| | *Operation:*<br>Operation of near-term, site-specific whole site modernization projects would not directly or indirectly destroy a unique paleontological resource or site. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| **4.12 Recreation** | | | | |
| *Require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction*:<br>New school or administrative facilities projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operations associated with new school or administrative facilities would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Whole Site Modernization | *Construction:*<br>Construction activities associated with whole site modernization projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operations associated with whole site modernization projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Upgrades of Existing School Administrative Sites | *Construction:*<br>None of the potential improvements that could occur with upgrades of existing school and administrative sites include recreational facilities that could result in adverse physical effects on the environment during construction. | No Impact | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>None of the potential improvements that could occur with upgrades of existing school and administrative sites include recreational facilities that could result in adverse physical effects on the environment during operations. | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>Construction activities associated with joint-use facilities would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operations associated with joint-use facilities would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Near-Term, Site-Specific, Whole Site Modernization Projects | *Construction:* Construction activities associated with the near-term, site-specific whole site modernization projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operations associated with the near-term, site-specific whole site modernization projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| **4.13 Transportation** | | | | |
| *Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:* Construction activities associated with new school or administrative facilities would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* **Impact-TRA-1: Conflict with Policies Related to Safe and Effective Pedestrian and Bicycle Routes to School and Result in Potential Safety Hazards During** | Potentially Significant | **MM-TRA-1: Develop a Safe Routes to School Plan.** During the planning phases for new schools or whole site modernizations, the District shall continue to coordinate with the City of San Diego to develop a Safe Routes to School (SRTS) Plan to ensure safe and efficient access for students walking and bicycling to | *Operation:* Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | **Operation of a New School.** New school construction could introduce new site access points and new pick-up/drop-off zones along roadways that include pedestrian, bicycle, and transit facilities, which could result in safety conflicts between the different users of the roadway or affect operations of these facilities. This would conflict with the City of San Diego's plans and policies addressing the circulation system, including roadway, pedestrian, bicycle, and transit facilities. This is a potentially significant impact. | | school. If a SRTS Plan exists, the District shall update the plan to reflect project improvements. The District shall consider the SRTS and its effectiveness at mitigating project-specific impacts prior to approvals of applicable subsequent projects under the plan.<br><br>**MM-TRA-2: Develop a Pick-up/Drop-off Plan.** During the planning phases for new schools or whole site modernizations, the District shall prepare a student pick-up/drop-off plan for all schools to ensure safety for all modes and to minimize disruptions resulting from project-related traffic. The pick-up/drop-off plan should identify any temporary controls and staff requirements (crossing guards, cones, signage, restrictions) and designate appropriate queuing areas and routes. Consistent with California Department of Education policy, pick-up/drop-off areas shall adhere to California Code of Regulations, Title 5, Section 14030 site design standards. The District shall consider the pick-up/drop-off plan and its effectiveness at mitigating project-specific impacts prior to approvals of applicable subsequent projects under the plan. | |
| Whole Site Modernization | *Construction:*<br>Construction activities associated with whole site modernization projects would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>**Impact-TRA-2: Conflict with Policies Related to Safe and Effective Pedestrian and Bicycle** | Potentially Significant | Implement **MM-TRA-1** and **MM-TRA-2**, as described above. | *Operation:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | **Routes to School and Result in Potential Safety Hazards During Operation of a Whole Site Modernization Project**. Whole site modernization projects could change site access and shift travel routes for existing traffic traveling to and from the school to different roadways as a result of new pick-up/drop-off zones or new driveways. Changes to site access along roadways that include pedestrian, bicycle, and transit facilities could result in safety conflicts between the different users of the roadway or affect operations of these facilities. This would conflict with the City's plans and policies addressing the circulation system, including roadway, pedestrian, bicycle, and transit facilities. | | | |
| Upgrades of Existing School and Administrative Sites | *Construction:* Construction activities associated with upgrades of existing school and administrative sites would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. | No Impact | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operational activities associated with upgrades of existing school and administrative sites would not conflict with a program, plan, ordinance, or policy addressing the | No Impact | No mitigation is required. | *Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | circulation system, including transit, roadway, bicycle, and pedestrian facilities. | | | |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:* Construction activities associated with joint-use facilities development would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. | No Impact | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operational activities associated with joint-use facilities development would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. | No Impact | No mitigation is required. | *Operation:* Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:* Construction activities associated with near-term, site-specific whole site modernization projects would not conflict with programs, plans, policies, or ordinances addressing the circulation system. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* **Impact-TRA-2**, as described above. | Potentially Significant | Implement **MM-TRA-1** and **MM-TRA-2**, as described above. | *Operation:* Less than Significant |
| *Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)* | | | | |
| New Acquisition and New School or | *Construction:* Construction activities associated with new school or administrative facilities would not conflict or be | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Administrative Facilities | inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). | | | |
| | *Operation:*<br>**Impact-TRA-3: Potential to Generate Increased Vehicle Miles Traveled Within the Program Area Due to Increased Student Capacity or New Staff.** New school or administrative facilities have the potential to increase student capacity within a cluster, which could generate an increase in vehicle miles traveled (VMT) within the Program area. This would be considered a conflict with State CEQA Guidelines Section 15064.3, subdivision (b), which constitutes a potentially significant impact. | Potentially Significant | **MM-TRA-3: Prepare a Project-Specific Vehicle Miles Traveled Analysis.** For any new school or administrative facilities project, the District shall prepare a project-specific vehicle miles traveled (VMT) analysis during subsequent environmental review to evaluate the potential for an increase in VMT per student. If an increase in VMT per student is identified, the District shall implement **MM-TRA-4**.<br><br>**MM-TRA-4: Prepare a Transportation Demand Management Plan.** If results of the vehicle miles traveled (VMT) analysis identify increases in VMT per student, the District shall prepare a Transportation Demand Management (TDM) plan for that site to help reduce the number of vehicular trips by promoting transportation choices, including carpooling, walking, bicycling, and taking transit. The TDM plan should emphasize available regional resources (such as San Diego Association of Governments' iCommute program), provide carpool matching resources, and/or identify relevant transit information. The District shall consider the TDM and its effectiveness at mitigating project-specific impacts prior to approvals of applicable subsequent projects under the plan. | *Operation:*<br>Significant and Unavoidable |
| Whole Site Modernization; Upgrades of Existing School and Administrative Sites; and Joint- | *Construction:*<br>Construction activities associated with whole site modernization projects would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Use Facilities Development Including Fields, Pools, and Play All Day Program | *Operation:*<br>Operation associated with whole site modernization projects would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site- Specific Whole Site Modernization Projects | *Construction:*<br>Construction activities associated with near-term, site-specific whole site modernization projects would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operation associated with near-term, site-specific whole site modernization projects would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| *Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:*<br>Construction activities would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>**Impact-TRA-1**, as described above. | Potentially Significant | Implement **MM-TRA-1** and **MM-TRA-2**, as described above. | *Operation:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Whole Site Modernization | *Construction:*<br>Construction activities would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>**Impact-TRA-2**, as described above. | Potentially Significant | Implement **MM-TRA-1** and **MM-TRA-2**, as described above. | *Operation:*<br>Less than Significant |
| Upgrades of Existing School and Administrative Sites, and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>Construction activities associated with upgrades of existing school and administrative sites and joint-use development would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operational activities associated with upgrades of existing school and administrative sites and joint-use development would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site-Specific Whole Site | *Construction:*<br>Construction activities associated with near-term, site-specific whole site modernization projects would | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Modernization Projects | not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). | | | |
| | *Operation:*<br>**Impact-TRA-2,** as described above. | Potentially Significant | Implement **MM-TRA-1** and **MM-TRA-2**, as described above. | *Operation:*<br>Less than Significant |
| *Result in inadequate emergency access* | | | | |
| All Project Categories | *Construction:*<br>Construction activities would not result in inadequate emergency access. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operational activities would not result in inadequate emergency access. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>Construction activities associated with near-term, site-specific whole site modernization projects would not result in inadequate emergency access. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operational activities associated with near-term, site-specific whole site modernization projects would not result in inadequate emergency access. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| **4.14 Tribal Cultural Resources** | | | | |
| *Substantial adverse change in the significance of a tribal cultural resource* | | | | |
| All Project Categories | *Construction:* | Potentially Significant | For **Impact-TRI-1:** | *Construction*: |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | **Impact-TRI-1: Disturbance and/or Destruction of Previously Identified Tribal Cultural Resources.** Ground-disturbing activities associated with implementation of the Proposed Program could result in damage or destruction of tribal cultural resources at the following school sites identified as locations of tribal cultural resources concern and would constitute a significant impact on a tribal cultural resource. This is a potentially significant impact.<br>• Clairemont High<br>• Correia Middle<br>• Holly Drive Leadership<br>• Iftin K-8<br>• Ingenuity Charter (co-located on the O'Farrell Charter School campus)<br>• Kavod Elementary<br>• Madison High<br>• Fay Elementary<br>• Franklin Elementary<br>• Taft Middle – Francis Parker Side<br>• Chavez Elementary<br>• Hage Elementary<br>• Mission Bay High<br>• Barnard Asian Pacific Language Academy<br>• Crown Point Junior Music Academy<br>• Sessions Elementary | | **MM-TRI-1: Conduct Monitoring of Ground-Disturbing Activities by Native American Monitors**. To reduce potential impacts on tribal cultural resources, prior to construction, the District shall consult with the Jamul Indian Village to determine if Native American monitors shall be present during ground-disturbing activities at the following school sites:<br>• Clairemont High<br>• Correia Middle<br>• Holly Drive Leadership<br>• Iftin K-8<br>• Ingenuity Charter (co-located on the O'Farrell Charter School campus)<br>• Kavod Elementary<br>• Madison High<br>• Fay Elementary<br>• Franklin Elementary<br>• Taft Middle – Francis Parker Side<br>• Chavez Elementary<br>• Hage Elementary<br>• Mission Bay High<br>• Barnard Asian Pacific Language Academy<br>• Crown Point Junior Music Academy<br>• Sessions Elementary<br>• Rodriguez Elementary<br>• Miramar Ranch Elementary<br>• Scripps Ranch High<br>• University City High<br>• Perkins K-8<br>• Pacific Beach Elementary<br>• Roosevelt Middle | Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | • Rodriguez Elementary<br>• Miramar Ranch Elementary<br>• Scripps Ranch High<br>• University City High<br>• Perkins K-8<br>• Pacific Beach Elementary<br>• Roosevelt Middle<br><br>**Impact-TRI-2 Disturbance and/or Destruction of Undiscovered Tribal Cultural Resources.** Ground-disturbing activities associated with the Proposed Program could result in damage or destruction of undiscovered tribal cultural resources, which would constitute a significant impact on a tribal cultural resource. This is a potentially significant impact. | | If it is determined that monitoring is necessary at any of the schools identified as being sensitive, the monitoring shall be conducted by a qualified Kumeyaay Native American monitor during ground-disturbing activities. The role of the Kumeyaay Native American monitor would be to represent tribal concerns and communicate with the tribal council. Appropriate representatives would be identified based on the location of the identified traditional location or place. Specifically, the following measures shall be implemented to reduce impacts:<br>• The Native American consultant/monitor, in consultation with the District, shall determine the extent of their presence during soil-disturbing and grading/excavation/trenching activities, and assist the District's qualified archaeologist and District with preparing the monitoring plan.<br>• If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop until the Native American monitor can observe and comment on the nature of the find.<br>• Attendance by Native American monitors during construction and restoration of the Proposed Program is at the discretion of the tribe, and the absence of a Native American monitor, should the tribes choose to forgo monitoring for some reason, will not delay work.<br>• The Native American monitors shall have the ability to notify the District's qualified archaeological monitor who has the authority to temporarily stop work if they find a cultural | |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | resource that may require recordation and evaluation.<br>• Interpretation of a find shall be requested from the Native American consultant/monitors involved with the discovery, evaluation, or data recovery of unanticipated finds for inclusion in a final Cultural Resources Report.<br>• The Native American monitor, in consultation with the District's qualified archaeologist, shall have the discretion to increase or decrease the level of monitoring under certain field conditions such as modern disturbance, including previous excavation/grading/trenching activities that exceed the depth of, or have removed, potential archaeological deposits; or when native soils are encountered.<br><br>For **Impact-TRI-2:**<br>**MM-TRI-2: Obtain a Sacred Lands File Search and Consult with Jamul Indian Village if Positive Results Are Identified**. To reduce potential impacts on tribal cultural resources, a Sacred Lands file search of the project site shall be obtained from the NAHC. If the file search is positive, the District shall implement **MM-TRI-1**. If the file search is negative, and the project location has not been identified an as area of tribal cultural resources concern, no further action is required. | |
| | *Operation*:<br>No impacts on tribal cultural resources would occur, as operation of District facilities does not involve ground disturbing activities | No Impact | No mitigation is required. | *Operation*:<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>**Impact-TRI-3**: **Disturbance and/or Destruction of Previously Identified Tribal Cultural Resources.** Ground-disturbing activities associated with implementation of the site-specific projects could result in damage or destruction of tribal cultural resources at the following school sites identified as locations of tribal cultural resources concern and would constitute a significant impact on a tribal cultural resource. This is a potentially significant impact.<br>• Clairemont High<br>• Correia Middle<br>• Madison High<br>• Barnard Asian Pacific Language Academy<br>• Crown Point Junior Music Academy<br>• Perkins K-8<br>• Pacific Beach Elementary<br>• Roosevelt Middle | Potentially Significant | **MM-TRI-3: Conduct Monitoring of Ground-Disturbing Activities by Native American Monitors.** To reduce potential impacts on tribal cultural resources, prior to construction, the District shall consult with the Jamul Indian Village to determine if Native American monitors shall be present during ground disturbing activities at the following school sites:<br>• Clairemont High<br>• Correia Middle<br>• Madison High<br>• Barnard Asian Pacific Language Academy<br>• Crown Point Junior Music Academy<br>• Perkins K-8<br>• Pacific Beach Elementary<br>• Roosevelt Middle<br>If it is determined that monitoring is necessary at any of the schools identified as being sensitive, the monitoring shall be conducted by a qualified Kumeyaay Native American monitor during ground-disturbing activities. The role of the Kumeyaay Native American monitor would be to represent tribal concerns and communicate with the tribal council. Appropriate representatives would be identified based on the location of the identified traditional location or place. Specifically, the following measures shall be implemented to reduce impacts:<br>• The Native American consultant/monitor, in consultation with the District, shall determine the extent of their presence during soil-disturbing and grading/excavation/trenching activities, and assist the District's qualified archaeologist and District with preparing the monitoring plan. | *Construction:*<br>Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | | | • If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop until the Native American monitor can observe and comment on the nature of the find.<br>• Attendance by Native American monitors during construction and restoration of the Proposed Program is at the discretion of the tribe, and the absence of a Native American monitor, should the tribes choose to forgo monitoring for some reason, will not delay work.<br>• The Native American monitors shall have the ability to notify the District's qualified archaeological monitor who has the authority to temporarily stop work if they find a cultural resource that may require recordation and evaluation.<br>• Interpretation of a find shall be requested from the Native American consultant/monitors involved with the discovery, evaluation, or data recovery of unanticipated finds for inclusion in a final Cultural Resources Report.<br>• The Native American monitor, in consultation with the District's qualified archaeologist, shall have the discretion to increase or decrease the level of monitoring under certain field conditions such as modern disturbance, including previous excavation/grading/ trenching activities that exceed the depth of, or have removed, potential archaeological deposits; or when native soils are encountered. | |
| | *Operation:*<br>Operations of the near-term, site-specific whole site modernization projects would not involve ground | No Impact | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | disturbance and therefore would not demolish or physically alter a tribal cultural resource. | | | |
| **4.15 Utilities** | | | | |
| *Relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:* Construction activities related to new school and administrative facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operational activities related to new school and administrative facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Whole Site Modernization | *Construction:* Construction activities related to whole site modernization projects would not result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, natural gas, or telecommunications facilities. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | *Operation:*<br>Operational activities related to whole site modernization projects would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Upgrades of Existing School and Administrative Sites | *Construction:*<br>Construction activities related to upgrades of existing school and administrative facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operational activities related to upgrades of existing school and administrative facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, | *Construction:*<br>Construction activities related to joint-use facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| and Play All Day Program | electric power, natural gas, or telecommunications facilities. | | | |
| | *Operation:*<br>Operation of joint-use facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:*<br>Construction activities associated with the near-term, site-specific whole site modernization projects would not result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operation of the 21 near-term, site-specific whole site modernization projects would not result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| *Insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:* Construction activities associated with new school or administrative facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with new school or administrative facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Whole Site Modernization | *Construction:* Construction activities associated with whole site modernization projects would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with whole site modernization projects would not result in insufficient water supplies available to serve the project and reasonably foreseeable future | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | development during normal, dry, and multiple dry years. | | | |
| Upgrades of Existing School and Administrative Sites | *Construction:* Construction activities associated with upgrades of existing school and administrative facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with upgrades of existing school and administrative facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:* Construction activities associated with joint-use facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with joint-use facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | during normal, dry, and multiple dry years. | | | |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:* Construction activities associated with the 21 near-term, site-specific whole site modernization projects would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with the 21 near-term, site-specific whole site modernization projects would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| *Result in a determination by the wastewater treatment provider which serves or may serve the project that it would not adequate capacity to serve the project's projected demand in addition to the provider's existing commitments* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:* Construction activities associated with new school or administrative facilities would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater facilities. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with new school or administrative facilities would not generate a substantial amount of wastewater that would | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | exceed the capacity of existing wastewater facilities. | | | |
| Whole Site Modernization; Upgrades of Existing School and Administrative Sites; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:* Construction activities associated with whole site modernizations, upgrades of school and administrative facilities, and joint-use facilities development would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater facilities. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with whole site modernizations, upgrades of school and administrative facilities, and joint-use facilities development would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater facilities. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:* Construction of the near-term, site-specific whole site modernization projects would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater treatment facilities. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with the 21 near-term, site-specific whole site modernization projects would not generate a substantial amount of | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | wastewater compared to existing conditions and would not exceed the capacity of the existing wastewater treatment facilities. | | | |
| *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 or fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:* Construction activities associated with new school or administrative facilities would not 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; or fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operations associated with new school or administrative facilities would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| Whole Site Modernization | *Construction:* Construction associated with whole site modernization projects would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operations associated with whole site modernization projects would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Upgrades of Existing School and Administrative Sites | *Construction:* Construction associated with upgrades of existing school and administrative sites would not 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; or fail to comply with federal, State, and local management and reduction statutes | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | and regulations related to solid waste. | | | |
| | *Operation:*<br>Operations associated with upgrades of existing school and administrative sites would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:*<br>Construction associated with joint-use facilities development would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operations associated with joint-use facilities would not 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; or fail to comply | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
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| | with federal, State, and local management and reduction statutes and regulations related to solid waste. | | | |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:* Construction of the near-term, site-specific whole site modernization projects would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation of the near-term, site-specific whole site modernization projects would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| **4.16 Wildfire** | | | | |
| *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires* | | | | |
| New Acquisition and | *Construction:* | Potentially Significant | **MM-WF-1: Prepare a Construction Fire Protection Plan.** For projects implemented under | *Construction:* |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| New School or Administrative Facilities | **Impact-WF-1: Potential to Exacerbate the Risk of Wildfire During Construction of New Acquisition and New School or Administrative Facilities Projects.** Construction activities associated with new acquisition and new school or administrative facilities projects in areas designated as Very High Fire Hazard Severity Zones could result in a potentially significant impact related to exacerbating wildfire risks from construction equipment and vehicles, as well as the use of flammable materials. Impacts would be potentially significant. | | the Proposed Program that are proposed in areas designated as Very High Fire Hazard Severity Zones, prior to construction, the District shall prepare a Construction Fire Protection Plan (CFPP) for the District property. The CFPP shall include, but not be limited to, the following measures to address potential ignition sources during construction:<br>• Parking for workers' vehicles and equipment will be designated away from dry brush and other ignition sources.<br>• Vehicle idling will be prohibited.<br>• During high fire risk conditions, designated vehicles will carry fire-prevention equipment, such as water, a shovel, and/or a fire extinguisher on the construction site at all times.<br>• Fireproof mats or shields will be used during welding or other construction activities that could produce sparks during high fire risk conditions.<br>• The District's temporary fire protection measures will be implemented as required by Section 01.50.00, Section A. Temporary Fire Protection, of the Standard Construction Specifications, which includes, but is not limited to, compliance with National Fire Protection Association 241 (fire prevention program); installation and maintenance of temporary fire-protection facilities; prohibiting smoking on District property; and supervising welding operations, combustion-type temporary heating units, or similar sources of fire ignition.<br>• A buffer will be established between vegetated canyons or other high fire risk areas on the project site during all construction activity. | Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | | | The District shall review the CFPP as part of the approval for any future project under this Program and determine the adequacy of the CFPP to mitigate future project-specific impacts. To the extent the CFPP does sufficiently mitigate a future project's impacts, the District shall prepare subsequent/supplemental environmental review to determine whether there are any additional, feasible mitigation measures that would mitigate impacts to a less-than-significant level. | |
| | *Operation:*<br>**Impact-WF-2: Potential to Exacerbate the Risk of Wildfire During Operation.** If new acquisition and new school or administrative facilities projects are implemented in areas designated as Very High Fire Hazard Severity Zones, operation of these new facilities could exacerbate wildfire risk that could expose students, staff, and onsite structures to significant hazards associated with wildfires. Impacts would be potentially significant. | Potentially Significant | **MM-WF-2: Prepare a Fire Protection Plan.** For new acquisition or new school or administrative facilities projects that are proposed in areas designated as Very High Fire Hazard Severity Zones (FHSZs), the District shall prepare a Fire Protection Plan (FPP) for the District property prior to commencing operation of the facility. The FPP shall be prepared to ensure that new school or administrative facilities developed within Very High FHSZs are in compliance with current regulatory codes and that impacts resulting from wildland fire hazards are adequately mitigated. The FPP shall include, but would not be limited to, the following:<br>• Measures to address specific location, topography, geology, level of flammable vegetation, and climate of the project site.<br>• Measures consistent with applicable fire codes.<br>• A vegetation management plan that includes measures such as reducing flammable vegetation around the property's structure and installing sprinklers that activate in the case of fire.<br>In addition, the following elements shall be included within the FPP:<br>• Emergency Services – Availability and Travel Time. | *Operation:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | | | • Access for Emergency Services and Evacuation of Students and Faculty (primary and, if required, additional access).<br>• Firefighting Water Supply.<br>• Fire Sprinkler System.<br>• Ignition Resistant Construction.<br>• Defensible Space, Ornamental Landscaping, and Vegetation Management.<br>The District shall review the FPP as part of the approval for any future project under this Program and determine the adequacy of the FPP to mitigate future project-specific impacts. To the extent the FPP does sufficiently mitigate a future project's impacts, the District shall prepare subsequent/supplemental environmental review to determine whether there are any additional, feasible, mitigation measures that would mitigate impacts to a less-than-significant level. | |
| Whole Site Modernizations; Upgrades of Existing School or Administrative Sites; and Joint-use Facilities Development Projects | *Construction:*<br>Construction of all other project categories would not result in significant impacts. Therefore, whole site modernizations, upgrades of existing school or administrative sites, and joint-use facilities development projects would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operation of all other project categories would not exacerbate existing wildfire hazards. Therefore, whole site modernizations, upgrades | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | of existing school or administrative sites, and joint-use facilities development projects would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. | | | |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction and Operation:* Construction and operation of near-term, site-specific whole site modernization projects would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. | Less than Significant | No mitigation is required. | *Construction and Operation:* Not Applicable |
| *Be located in or near state responsibility areas or lands classified as Very High FHSZ and, due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:* **Impact-WF-3: Potential to Exacerbate the Risk of Wildfire and Expose Project Occupants to Pollutants or Uncontrolled Spread of Wildfire During Construction.** Construction activities associated with the Proposed Program may be located within a Very High Fire Hazard Severity Zone and could result in a potentially significant impact related to exacerbating wildfire risks of, and thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be potentially significant | Potentially Significant | Implement **MM-WF-1**, as described above. | *Construction:* Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | *Operation:*<br>**Impact-WF-4: Potential to Expose Project Occupants to Pollutants or Uncontrolled Spread of Wildfire During Operation.** New acquisition and new school or administrative facilities projects may be located within a Very High Fire Hazard Severity Zone and could exacerbate wildfire risk by introducing additional students and/or staff to the area, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be potentially significant | Potentially Significant | Implement **MM-WF-2**, as described above. | *Operation:*<br>Significant and Unavoidable |
| Whole Site Modernizations; Upgrades of Existing School or Administrative Sites, and Joint-use Facilities Development Projects | *Construction:*<br>Construction associated with whole site modernization, upgrades of existing school and administrative sites, and joint-use field development projects would not exacerbate wildfire risk, and therefore would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. | Less than Significant | No mitigation is required. | *Construction:*<br>Not Applicable |
| | *Operation:*<br>Operations associated with whole site modernization, upgrades of existing school and administrative sites, and joint-use field development projects would not exacerbate wildfire risks of, and | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. | | | |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction and Operation:* Construction and operation of the near-term, site-specific whole site modernization projects would not exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. | Less than Significant | No mitigation is required. | *Construction and Operation:* Not Applicable |
| *Be located in or near state responsibility areas or lands classified as Very High FHSZ, and 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 on the environment* | | | | |
| New Acquisition and New School or Administrative Facilities | *Construction:* **Impact-WF-5: Exacerbate Wildfire Risk from the Installation of New Infrastructure During Construction of New Acquisition and New School or Administrative Facilities Projects.** Construction activities associated with new school or administrative facilities may require the installation of new or extended utilities in Very High Fire Hazard Severity Zones, which could exacerbate the wildfire risk to the students and staff at these project sites during construction. Impacts would be potentially significant. | Potentially Significant | Implement **MM-WF-1**, as described above. | *Construction:* Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | *Operation:*<br>**Impact-WF-6: Exacerbate Wildfire Risk from the Maintenance of Infrastructure or Fire Breaks.** Operations associated with new school or administrative facilities may require the operational maintenance of infrastructure (e.g., utilities), fire breaks, or other fire-protection measures in Very High Fire Hazard Severity Zones, which could result in temporary or ongoing environmental impacts. | Potentially Significant | Implement **MM-WF-2,** as described above. | *Operation:*<br>Significant and Unavoidable |
| Whole Site Modernization | *Construction:*<br>**Impact-WF-7: Exacerbate Wildfire Risk from the Installation of New Infrastructure During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects may require the installation of new or extended utilities in Very High Fire Hazard Severity Zones, which could exacerbate the wildfire risk to the students and staff at these project sites during construction. Impacts would be potentially significant. | Potentially Significant | Implement **MM-WF-1**, as described above. | *Construction:*<br>Significant and Unavoidable |
| | *Operation:*<br>Operations of whole site modernization projects would not exacerbate fire risk or result in temporary or ongoing impacts on | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | the environment due to installation or maintenance of infrastructure. | | | |
| Upgrades of Existing School and Administrative Sites, and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:* Construction activities associated with upgrades of existing school and administrative sites or joint-use facilities development would not exacerbate wildfire risk or result in temporary or ongoing impacts on the environment due to the installation or maintenance of infrastructure. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operations following upgrades of existing school and administrative sites or joint-use facilities development would not exacerbate fire risk or result in temporary or ongoing impacts on the environment due to installation or maintenance of infrastructure. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction:* **Impact-WF-8: Exacerbate Wildfire Risk from the Installation of New Infrastructure.** Near-term, site-specific whole site modernization projects at Kearny High School, Perry Elementary School, and Roosevelt Middle School may require the installation of relocated or upgraded utilities or other infrastructure, which could exacerbate the wildfire risk to the students and staff at these project | Potentially Significant | Implement **MM-WF-1**, as described above. | *Construction:* Less than Significant |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | sites during construction due to their location within a Very High Fire Hazard Severity Zone. Impacts would be potentially significant. | | | |
| | *Operation:*<br>Operation of the near-term, site-specific whole site modernization projects would not exacerbate wildfire risk or result in temporary or ongoing impacts on the environment due to installation or maintenance of infrastructure. | Less than Significant | No mitigation is required. | *Operation:*<br>Not Applicable |
| *Be located in or near state responsibility areas or lands classified as Very High FHSZ, and 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* | | | | |
| New Acquisition and New School or Administrative Facilities; | *Construction:*<br>**Impact-WF-9: Expose People or Structures to Significant Risks from Post-Fire Hazards During Construction.** New acquisition and new school or administrative facilities projects could exacerbate risks to life and property by placing workers and structures in areas prone to wildfire and susceptible to post-fire hazards. Impacts would be potentially significant. | Potentially Significant | Implement **MM-WF-1**, as described above. | *Construction:*<br>Significant and Unavoidable |
| | *Operation:*<br>**Impact-WF-10: Expose People or Structures to Significant Risks from Post-Fire Hazards During Operation.** The operation of new acquisition and new school or administrative facilities projects could exacerbate risks to life and | Potentially Significant | Implement **MM-WF-2**, as described above. | *Operation:*<br>Significant and Unavoidable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| | property by placing students, staff, and structures in areas prone to wildfire and susceptible to post-fire hazards. Impacts would be potentially significant | | | |
| Whole Site Modernization; Upgrades of Existing School and Administrative Sites; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | *Construction:* Construction associated with whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities development would not have the potential to expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes during construction. | Less than Significant | No mitigation is required. | *Construction:* Not Applicable |
| | *Operation:* Operation associated with whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities development would not have the potential to 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 during operation. | Less than Significant | No mitigation is required. | *Operation:* Not Applicable |

| Issue | Impact | Significance Before Mitigation | Mitigation Measure(s) | Significance After Mitigation |
|---|---|---|---|---|
| Near-Term, Site-Specific Whole Site Modernization Projects | *Construction and Operation:* Near-term, site-specific whole site modernization projects would not have the potential to expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes during construction. | Less than Significant | No mitigation is required. | *Construction and Operation:* Not Applicable |

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# Chapter 1
# Introduction

## 1.1 Project Overview

The San Diego Unified School District (District) is the Lead Agency preparing this Draft Program Environmental Impact Report (PEIR) for the District's proposed Capital Improvement Program and the *San Diego Unified School District CEQA Handbook* (Proposed Program). The purpose of this Draft PEIR is to provide the decision-making body at the District, the Board of Education, and the general public with information concerning the environmental impacts associated with the Proposed Program.

The Proposed Program would include preparation of District-specific guidelines to identify screening criteria to streamline the California Environmental Quality Act (CEQA) analyses for various project types to repair, renovate, and revitalize District schools and administration facilities. The repair, renovation, and revitalization projects associated with the Proposed Program would include a wide range of future construction and operational activities on either existing school sites or administration facilities or on new, currently unidentified sites.

A more detailed description of the potential improvements included in the Proposed Program and analyzed within this Draft PEIR is provided in Chapter 3, *Project Description*. A full copy of the *San Diego Unified School District CEQA Handbook* is provided in Appendix A of this Draft PEIR.

## 1.2 Purpose of the California Environmental Quality Act and the Program Environmental Impact Report

This Draft PEIR evaluates the potential environmental effects of the Proposed Program and has been prepared in compliance with CEQA (Public Resources Code Section 21000 et seq.) and the procedures for implementing CEQA set forth in the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.).

CEQA was enacted by the California legislature in 1970. As noted under State CEQA Guidelines Section 15002, CEQA has four basic purposes:

1. Inform governmental decision-makers and the public about the potential significant environmental effects of proposed activities.
2. Identify the ways in which environmental damage can be avoided or significantly reduced.
3. Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

An environmental impact report is an informational document, the purpose of which is to inform members of the public and agency decision-makers of the significant environmental effects of a proposed project, identify feasible ways to reduce the significant effects of the proposed project through the incorporation of mitigation measures, and describe a reasonable range of feasible alternatives to the project that would reduce one or more significant effects and still meet the proposed project's basic objectives. In instances where significant impacts cannot be avoided or mitigated, the proposed project may nonetheless be carried out or approved if the approving agency finds that economic, legal, social, technological, or other benefits outweigh the unavoidable significant environmental impacts.

In accordance with State CEQA Guidelines Section 15168, this environmental impact report is being prepared as a PEIR that evaluates the environmental effects of the Proposed Program at a programmatic level. According to Section 15168, a PEIR may be prepared on a series of actions that can be characterized as one large project and that are related either geographically or as individual activities carried out under the same authorizing statutory or regulatory authority and that generally have similar environmental effects that can be mitigated in similar ways. One of the benefits of preparing a PEIR is that it allows for a reduction in paperwork by streamlining future subsequent activities found to be within the scope of the program described in the Draft PEIR.

## 1.3 Intended Uses of the Program Environmental Impact Report

The purpose of this document is to inform the District's decision-making body, public agencies, and members of the public as to the nature of the Proposed Program; the ways in which the Proposed Program would affect the physical environment; and the measures that the District would implement to mitigate for the identified significant environmental impacts. The PEIR will be used by the District's Board of Education (Board) during the decision-making process for the Proposed Program. The Board must first decide whether to certify the PEIR, signifying that the document adequately complies with environmental review procedures required by CEQA, and then must use the descriptions and analysis presented in the document to make an informed decision on approval of the Proposed Program.

### 1.3.1 Agencies Expected to Use this Program Environmental Impact Report

The District is the CEQA lead agency, as defined in State CEQA Guidelines Section 15050, because it has principal responsibility for carrying out and approving the Proposed Program. As the lead agency, the District also has primary responsibility for complying with CEQA. As such, the District has analyzed the environmental effects of the Proposed Program, the results of which are presented in this Draft PEIR.

This PEIR is intended to be an informational document to be used by the Board, public agencies, and individuals, and the general public during the decision-making process for the Proposed Program. In accordance with the State CEQA Guidelines, this PEIR will inform readers of the potential significant environmental effects of the Proposed Program, identify feasible mitigation measures for reducing the Proposed Program's significant effects, and describe a range of reasonable alternatives to the

Proposed Program that would avoid or substantially lessen its significant environmental effects. The Board will consider the PEIR, along with other substantial evidence in the administrative record, when making a decision on whether to approve the Proposed Program. The Board, in its role as the decision-making body of the District, is responsible for certifying the Final PEIR and approving the Findings of Fact and, if required, the Statement of Overriding Considerations pursuant to Sections 15090–15093 of the State CEQA Guidelines prior to approval. Table 1-1 provides a summary list of the approvals that would be required.

**Table 1-1. List of Required Discretionary Actions**

| Discretionary Action | San Diego Unified School District |
|---|---|
| Certification of Final PEIR | X |
| Adoption of Mitigation Monitoring and Reporting Program | X |
| Adoption of Findings of Fact | X |
| Adoption of Statement of Overriding Considerations | X |
| Adoption of *San Diego Unified School District CEQA Handbook* | X |

## 1.3.2 Programmatic Analysis and Future Streamlining

The Proposed Program involves the establishment and implementation of the District's Capital Improvement Program to repair, renovate, and revitalize District schools and administrative facilities. The repair, renovation, and revitalization projects associated with the Proposed Program would include a wide range of future construction and operational activities on either existing school sites or administration facilities or on new, currently unidentified sites. Because sufficient details regarding future projects associated with the Proposed Program are not available to facilitate a project-level impact analysis and because no approvals would be provided for specific development projects at this time, this Draft PEIR evaluates the potential physical changes to the environment associated with the Proposed Program at a program level.

In addition, the District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites. At this time, the specific details for each of these projects are unknown. Therefore, the Draft PEIR evaluates the potential physical changes to the environment associated with these near-term, site-specific projects at a program level.

According to State CEQA Guidelines Section 15168(c), later activities in the program must be examined in light of the PEIR to determine whether any additional environmental documentation is required. Once certified, this PEIR can be used to simplify the task of preparing environmental documents on future activities associated with the program. Specifically, Section 15168(c) provides the following:

> Use with Later Activities. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.
>
> (1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the program EIR as provided in Section 15152.

(2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.

(4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.

(5) A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

If the District finds that, pursuant to State CEQA Guidelines Sections 15162, 15163, and 15164, no subsequent, supplemental, or addendum to the EIR would be required, the District can approve the activity as being within the scope of the program covered by the Draft PEIR, and no new environmental impact analysis pursuant to CEQA would be required (State CEQA Guidelines Section 15168(c)(2)). However, if it is determined that additional environmental review is required for future subsequent actions, these future projects may tier from this PEIR when preparing site-specific CEQA documents as allowed under State CEQA Guidelines Section 15152.

## 1.4 Scope and Content of the Draft Program Environmental Impact Report

This Draft PEIR provides a detailed description of the Proposed Program (Chapter 3, *Project Description*) and the environmental review conducted for the Proposed Program (Chapter 4, *Environmental Analysis*, Chapter 5, *Cumulative Impacts*, and Chapter 6, *Additional Considerations*). Based on the analysis in the Initial Study/Environmental Checklist (Appendix B), it was determined that implementation of the Proposed Program would not have an adverse effect on Agriculture and Forestry Resources, Mineral Resources, Population and Housing, and Public Services. In addition, implementation of the Proposed Program was determined to result in no adverse effects related to Land Use and Planning. In accordance with State CEQA Guidelines Section 15128, a brief explanation indicating the reasons that the effects on these resources would not be significant is provided in Chapter 6.

The environmental issue areas identified for the Proposed Program as being potentially significant and requiring further analysis in this Draft PEIR include:

- Aesthetics
- Air Quality and Health Risk

- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise and Vibration
- Paleontological Resources
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities
- Wildfire

In addition, the remaining sections of the Draft PEIR include Chapter 7, *Alternatives*, Chapter 8, *List of Preparers and Agencies Consulted*, and Chapter 9, *References.*

### 1.4.1 Comments Received in Response to the Notice of Preparation

As the CEQA lead agency, the District is responsible for determining the scope and content of this Draft PEIR, a process referred to as *scoping*. As part of the scoping process, the District considered the environmental resources present within its jurisdiction and the surrounding area and identified the probable environmental effects of the proposed project. On March 22, 2019, the District posted a Notice of Preparation (NOP) with the County Clerk in accordance with Section 15082 of the State CEQA Guidelines. The NOP was mailed to public agencies, organizations, and other interested individuals to solicit their comments on the scope and content of the environmental analysis. The District also held five public scoping meetings on the following dates and locations:

- April 12, 2019, at Morse High School Auditorium, 6905 Skyline Drive, San Diego, CA 92114
- April 11, 2019, at Scripps Ranch High School Library, 10410 Falcon Way, San Diego, CA 92131
- April 16, 2019, at Mission Bay High School Library, 2475 Grand Avenue, San Diego, CA 92109
- April 17, 2019, at Hoover High School Library, 4474 El Cajon Boulevard, San Diego, CA 92115
- April 18, 2019, at University City High School Auditorium, 6949 Genesee Avenue, San Diego, CA 92122

Comments received in response to the NOP and during the public scoping meeting were used to inform the scope of this Draft PEIR. A summary of these comments and the sections where they are addressed in this Draft PEIR are provided in Table 1-1. Only comments that pertain to the

environmental scope of this Draft PEIR are summarized. The NOP and copies of all NOP comment letters are provided in Appendix B of this Draft PEIR.

**Table 1-2. Summary of NOP Comments Received**

| Commenter | Environmental Issue(s) Raised | Addressed in this Draft PEIR in Chapter/Section |
|---|---|---|
| **State** | | |
| State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit (SCH), March 22, 2019 | Provides SCH# 2019039131 and notes which state agencies received a copy of the NOP. | N/A |
| Native American Heritage Commission (NAHC), Steven Quinn, April 2, 2019 | Notes that CEQA was amended in 2014 to create a separate category for tribal cultural resources in CEQA Appendix G: Environmental Checklist Form. | Section 4.14, *Tribal Cultural Resources* |
| | Notes the requirement to analyze impacts on tribal cultural resources as required under Assembly Bill (AB) 52 and indicates the tribal consultation requirements pursuant to Senate Bill (SB) 18 and AB 52. | Section 4.14, *Tribal Cultural Resources* |
| | Recommends that lead agencies consult with all California Native American Tribes traditionally and culturally affiliated with the geographic area of the proposed project. | Section 4.14, *Tribal Cultural Resources* |
| | Summarizes the additional CEQA requirements added by AB 52 as well as other requirements. | Section 4.14, *Tribal Cultural Resources* |
| | Summarizes the applicability and requirements of SB 18, and identifies the specific provisions included under SB 18. | Section 4.14, *Tribal Cultural Resources* |
| | Provides NAHC recommendations for cultural resources assessments to avoid, preserve, and/or mitigate impacts on tribal cultural resources. | Section 4.14, *Tribal Cultural Resources* |
| **Local** | | |
| City of San Diego Planning Department, Heidi Vonblum, April 22, 2019. | Notes that how and when site-specific information will be reflected in the environmental review process is a critical consideration. The Draft EIR should include guidance to assure sufficient detail is at least provided through additional environmental review per Section 15168 of the State CEQA Guidelines. | Chapter 3, *Project Description* |
| | Notes that biological resources analysis should include site-specific considerations, as applicable, based on state, federal, and local biological regulations, plans, and/or policies. | Section 4.3, *Biological Resources* |
| | Notes that further analysis for hydrology and water quality should be included in the Program EIR. As projects are proposed and designed, analysis should drill down to a project level. | Section 4.9, *Hydrology and Water Quality* |

| Commenter | Environmental Issue(s) Raised | Addressed in this Draft PEIR in Chapter/Section |
|---|---|---|
| | Notes that City of San Diego Council Policy 800-04 requires a flood plain management program be applied to flood plain areas designated on flood hazard boundary maps as furnished by the National Flood Insurance Administration. Requests further consideration of the proposed Program's potential to place structures within a 100-year flood hazard area and assure compliance with Council Policy 800-04, and document the less-than-significant impact determination. | Section 4.9, *Hydrology and Water Quality* |
| | Notes that per City of San Diego Council Policy 800-04, the responsibility for construction stormwater drainage facilities is based upon the certain criteria identified in the policy. | Section 4.15, *Utilities and Service Systems* |
| | Notes the transportation analysis and thresholds of significance should follow the guidelines of the City of San Diego *Traffic Impact Study Manual*, July 1998. | Section 4.13, *Transportation* |
| | Notes that the PEIR should include alternatives that avoid or reduce expected transportation/circulation impacts. | Section 4.13, *Transportation* |
| | Notes that impacts on transportation facilities within the City should be evaluated and impacts mitigated. | Chapter 7, *Alternatives* |
| | Notes PEIR should analyze the separate phases of the project. | Chapter 3, *Project Description* |
| | Notes the PEIR should evaluate opportunities for enhanced access to school sites via transit, bicycle, pedestrian, or other modes. | Section 4.13, *Transportation* |
| | Notes the PEIR should include analysis for any construction traffic impacts. | Section 4.13, *Transportation* |
| | Notes pursuant to SB 743, a vehicle miles traveled analysis should be included in the PEIR. | Section 4.13, *Transportation* |
| | Notes that the PEIR should provide a traffic analysis for any closure of public streets and the effect of the closure on nearby streets and intersections. | Section 4.13, *Transportation* |
| | Notes that the PEIR should require that a traffic control plan be submitted to the City for review. | Section 4.13, *Transportation* |
| | Notes that no lane closure should occur on public streets during the AM and PM peak commuter hours to minimize disruption of communities from construction traffic. | Section 4.13, *Transportation* |

# 1.5 Organization of the Draft Program Environmental Impact Report

The content and format of this Draft PEIR are designed to meet the requirements of CEQA and State CEQA Guidelines Article 9. Table 1-3 summarizes the organization and content of the Draft PEIR.

**Table 1-3. Document Organization and CEQA Requirements**

| Draft PEIR Chapter | Contents |
|---|---|
| *Summary* | Includes a brief summary of the Proposed Program; identifies each significant effect, including proposed mitigation measures and alternatives to reduce or avoid the effect; identifies the areas of controversy known to the lead agency, including issues raised by agencies and the public; and summarizes the issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects (State CEQA Guidelines Section 15123). |
| Chapter 1<br>*Introduction* | Discusses the purpose of CEQA and this Draft PEIR, the scope and content of this Draft PEIR, the organization of this Draft PEIR, and the intended uses for this Draft PEIR (State CEQA Guidelines Section 15124(d)). |
| Chapter 2<br>*Environmental Setting* | Describes the overall existing physical conditions in the vicinity of the Proposed Program when the analysis was initiated. In addition, the specific existing setting/conditions for each resource area are described in the applicable resource section in Chapter 4, *Environmental Analysis* (State CEQA Guidelines Section 15125). |
| Chapter 3<br>*Project Description* | Contains both a map of the location and boundaries of the Proposed Program area and its location relative to the region; lists the Proposed Program's central objectives, underlying purpose, and project benefits; and provides a detailed description of the proposed project's characteristics (State CEQA Guidelines Section 15124(a), (b), and (c)). |
| Chapter 4<br>*Environmental Analysis* | Describes the existing physical conditions for each resource area, lists the applicable laws and regulations germane to the specific resource, describes the impact assessment methodology, lists the criteria for determining whether an impact is significant, identifies the direct and indirect significant environmental impacts that would result from implementation of the Proposed Program, and lists feasible mitigation measures that would eliminate or reduce the identified significant impacts (State CEQA Guidelines Sections 15125–15126.4). |
| Chapter 5<br>*Cumulative Impacts* | Defines the cumulative study area for each resource; identifies past, present, and reasonably foreseeable future projects with related impacts within each study area; and evaluates the contribution of the Proposed Program to a cumulatively considerable impact. This chapter also lists feasible mitigation measures that would eliminate or reduce the identified significant cumulative impacts (State CEQA Guidelines Section 15130). |
| Chapter 6<br>*Additional Considerations* | Discusses the way the Proposed Program could foster economic or population growth, either directly or indirectly, in the surrounding environment; describes the significant irreversible changes associated with the Proposed Program's implementation; and provides a brief discussion of the environmental resource impacts that were found to not |

| Draft PEIR Chapter | Contents |
|---|---|
| | be significant during preparation of this Draft PEIR (State CEQA Guidelines Sections 15126.2(c) and (d), 15127, and 15128). |
| Chapter 7<br>*Alternatives* | Describes a reasonable range of alternatives to the Proposed Program, including the No-Project Alternative; compares and contrasts the significant environmental impacts of alternatives to the Proposed Program; and identifies the environmentally superior alternative (State CEQA Guidelines Section 15126.6). |
| Chapter 8<br>*List of Preparers* | Lists the individuals and agencies involved in preparing this Draft PEIR (State CEQA Guidelines Section 15129). |
| Chapter 9<br>*References* | Provides a comprehensive listing by chapter of all references cited in this Draft PEIR (State CEQA Guidelines Section 15148). |
| Acronyms and Abbreviations | A list of acronyms and abbreviations is provided for the reader's reference immediately following the list of tables and figures in the Table of Contents. |
| Appendices | Presents additional background information and technical detail for several of the resource areas. |

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# Chapter 2
# Environmental Setting

## 2.1 Introduction

This chapter provides a description of the overall physical environmental conditions within the Program area as they existed at the time the Notice of Preparation (NOP) was published in March 2019.[1] Resource-specific existing conditions are provided within each individual resource section of Chapter 4, *Environmental Analysis*, which also discusses any inconsistencies with applicable plans.[2]

## 2.2 Environmental Setting

### 2.2.1 Regional Setting

The Program area includes the entire boundary of the District, which is primarily located within the City of San Diego jurisdictional boundaries in the southwestern portion of the City but also includes a small portion of the City of La Mesa, the City of Lemon Grove, and unincorporated San Diego County. However, all existing District facilities are within the boundaries of the City of San Diego. Neighboring San Diego County school districts include Del Mar Union School District, San Dieguito Union High School District, and Poway Unified School District to the north; Santee School District, Cajon Valley Union School District, Lemon Grove School District, La Mesa-Spring Valley School District, and Grossmont Union High School District to the east; and Coronado Unified School District, National Elementary School District, Chula Vista Elementary School District, and Sweetwater Union High School District to the south.

### 2.2.2 School Clusters and Surrounding Setting

The District comprises 225 total educational facilities,[3] 10 administrative sites, and 3 vacant parcels of land. Physical site conditions vary from school to school, but most schools within the District consist of single- and/or two-story classroom buildings, portable structures, parking lots, and athletic facilities such as hardcourt play areas, decomposed granite fields, and/or turf athletic fields. In accordance with Vision 2020, District schools are organized into clusters for greater community cohesion. The District consists of 16 clusters that are organized geographically. Each school cluster consists of a high school and the elementary, K–8, and middle schools that feed into it to create a continuity for the neighborhood students in the pre-K to 12 program. Additionally, each cluster

[1] State CEQA Guidelines Section 15125 states that an EIR must include "a description of the physical environmental conditions in the vicinity of the project. This environmental setting will *normally* constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives" (emphasis added).

[2] For example, Section 4.2, *Air Quality and Health Risk*, contains a project consistency analysis with the applicable air quality plans.

[3] The total educational facilities include 48 charter schools as of the 2018–2019 academic year. While the District acts as the authorizing agency for charter schools, they operate independently from the District.

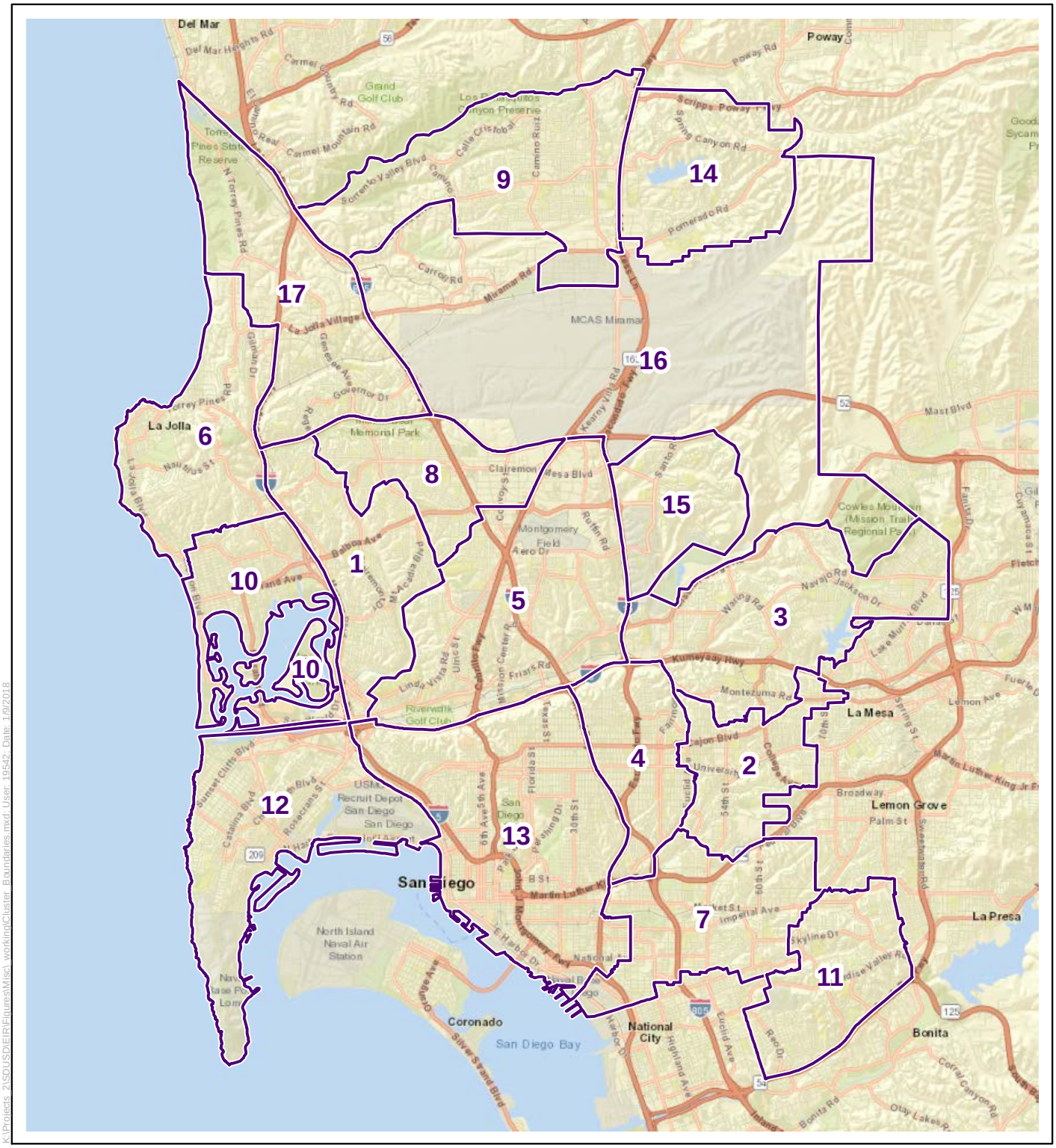
has a council that promotes the schools in their community and works with schools, community, and District staff to improve the quality of their neighborhood schools. Figure 2-1 depicts the locations of each cluster within the District's boundaries.

In addition to traditional schools, clusters also contain atypical and alternative schools. While there is no formal definition of these schools, atypical schools are generally public schools with grade ranges that are not within the typical grade ranges of an elementary (grades K–6), middle (grades 6–9), or senior high (grades 9–12) school. For example, a K–8 school could be considered an atypical school. Alternative schools generally include continuation and special education schools.

Charter schools are public schools that provide instruction in grades kindergarten through 12 and are usually created or organized by a group of parents, teachers and other educators, and community leaders or community-based organizations. An existing public school board usually authorizes charter schools. The specific goals and operating procedures for a charter school are detailed in the agreement (or "charter") between the board and the organizers. Key objectives are to provide choices for parents and students within the public school system for innovative, high-quality learning opportunities and stimulate competition in the educational market (District 2020). It should be noted that charter schools may be physically located within specific District clusters but are not considered part of the cluster. However, for the purposes of this Program EIR (PEIR), charter schools are included within the cluster in which they are physically located. It is also important to note that the Proposed Program only applies to charter schools on District property. The District does not have any discretionary authority related to the development of facilities on non-District property. As such, none of the project categories associated with the Proposed Program would be implemented at any charter facilities not located within District property. For disclosure purposes, Tables 2-1 through 2-16 below denote the charter schools that are not on District property but are physically located within the cluster. Additionally, the list of charter schools presented in Tables 2-1 through 2-16 includes only those schools that are issued charters by the District and, therefore, is not a comprehensive list of all charter schools that may be physically located within the District's boundaries. Lastly, because the locations of charter schools can vary from year-to-year, Tables 2-1 through 2-16 include the school addresses as of the date the NOP was published in March 2019.

Per Proposition 39, Education Code 47614, and the California Code of Regulations, Title 5, Sections 11969 et seq. (Regulations) the District is required to offer facilities, to the extent required by law, to a charter school that submits a legally complete application. A typical charter school application process is as follows.

- A charter school wishing to occupy District facilities in the upcoming school year is required to submit a complete application for facilities by November 1 of the prior school year. The District analyzes each charter school's request in conformity with the law and provides feedback to the charter school regarding the charter school's stated in-district classroom Americans with Disabilities Act (ADA) projections, prior to developing the District's preliminary proposal in response to the application.
- On or before February 1, the District submits preliminary proposals to eligible charter schools and charter schools are required to respond with any concerns regarding the preliminary proposals on or before March 1.
- On or before April 1, the District submits final offers of facilities to eligible charter schools, and charters are required to respond to the final offers in order to receive District facilities for the upcoming year on or before May 1.




**Cluster Boundaries**

1-Clairemont
2-Crawford
3-Henry
4-Hoover
5-Kearny
6-La Jolla
7-Lincoln
8-Madison
9-Mira Mesa
10-Mission Bay
11-Morse
12-Point Loma
13-San Diego
14-Scripps Ranch
15-Serra
16-Unassigned
17-University City




Source: Imagery-ESRI Street Map (2018)

0 1 2 Miles
1 in =3 miles

N

**Figure 2-1**
**Cluster Boundaries**

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Note that the preliminary proposals are only the first step in the process of developing final offers of facilities to charter schools. San Diego Unified School District Board (Board) approval of these preliminary proposals is required in order to continue this process, including discussion of preliminary proposals with charter schools and District schools impacted by the proposals, and to meet the statutory requirements to present these proposals to charter schools by February 1.

### 2.2.2.1 Clairemont High School Cluster

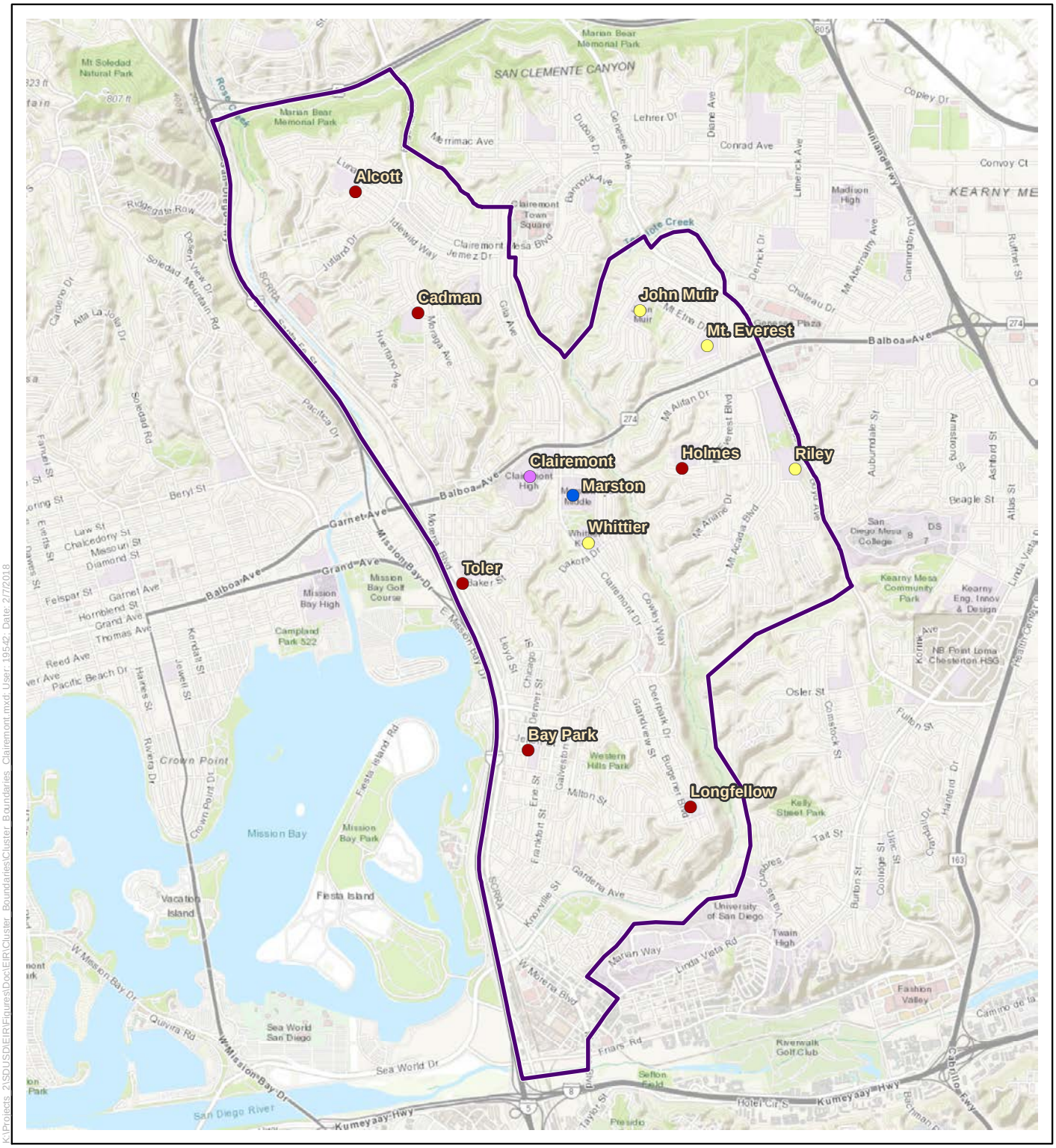
The Clairemont High School Cluster is within the Clairemont Mesa Community in the central portion of the City of San Diego. The cluster is within an urbanized area characterized predominantly by single- and multi-family residences. Other surrounding land uses include commercial, industrial, park and recreation, and institutional. Table 2-1 details and Figure 2-2 depicts the schools physically located within the Clairemont High School Cluster.

**Table 2-1. Clairemont High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[1] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Alcott ES* | 4680 Hidalgo Ave | 439 | 9.5 | 25 | 1955–2003 |
| Bay Park ES | 2433 Denver St | 504 | 4.6 | 25 | 1939–1953 |
| Cadman ES* | 4370 Kamloop Ave | 191 | 8.2 | 18 | 1957–2006 |
| Holmes ES | 4902 Mt. Ararat Dr | 560 | 9.0 | 25 | 1962–2004 |
| Toler ES | 3350 Baker St | 264 | 6.2 | 17 | 1960–2004 |
| **Middle Schools** | | | | | |
| Marston MS* | 3799 Clairemont Dr | 670 | 19.1 | 48 | 1957–2004 |
| **High Schools** | | | | | |
| Clairemont HS | 4150 Ute Dr | 917 | 36.3 | 65 | 1958–2015 |
| **Atypical/Alternative Schools** | | | | | |
| Longfellow K-8 | 5055 July St | 714 | 5.3 | 35 | 1955–2003 |
| John Muir Language Academy | 4431 Mt. Herbert Ave | 187 | 9.6 | 19 | 1954 |
| Mt Everest K–12 | 4350 Mt. Everest Blvd | 269 | 8.9 | 17 | 1959 |
| Riley K–12 | 5650 Mt. Ackerly Dr | 192 | 8.8 | 22 | 1959 |
| Whittier K–12 | 3401 Clairemont Dr | 54 | 9.2 | 28 | 1953–1972 |
| **Charter Schools** | | | | | |
| None | -- | -- | -- | -- | -- |

[1] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School site has an existing, active joint-use agreement with the City.




Cluster Boundaries

**School Type**

- Atypical School
- Elementary School
- High School
- Middle School

Source: Imagery-ESRI Street Map (2018)

0 0.5 1 Miles

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**Figure 2-2**
**Schools within Clairemont Cluster**

### 2.2.2.2 Crawford High School Cluster

The Crawford High School Cluster is primarily within the Eastern Area Community in the easternmost portion of the City of San Diego. The northern portion of the Crawford High School Cluster is within the College Area Community. The cluster is within an urbanized area characterized predominantly by single- and multi-family residences. El Cajon Boulevard and University Avenue are the main east-west commercial corridors in the Eastern Area and College Area communities. Table 2-2 details and Figure 2-3 depicts the schools physically located within the Crawford High School Cluster.

**Table 2-2. Crawford High School Cluster Details**

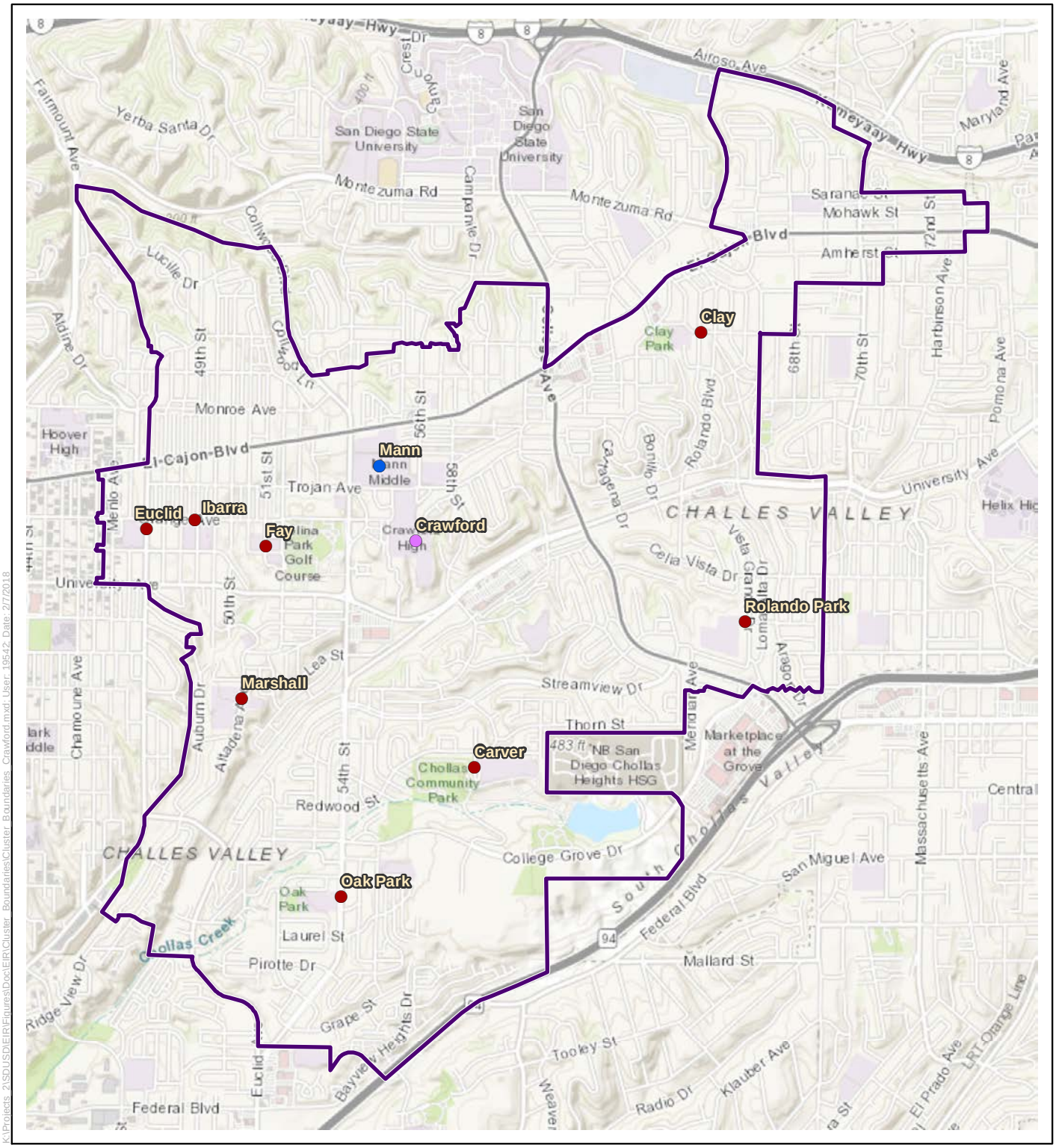
| School | Address | 2018–2019 Enrollment | Site Acreage[2] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Carver ES | 3251 Juanita St | 246 | 8.9 | 23 | 1955–2006 |
| Clay ES** | 6506 Solita Ave | 313 | 7.0 | 22 | 1956–2006 |
| Euclid ES | 4166 Euclid Ave | 495 | 5.8 | 43 | 1938–2012 |
| Fay ES** | 4080 52nd St | 595 | 6.3 | 32 | 2007 |
| Ibarra ES** | 4877 Orange Ave | 458 | 7.9 | 32 | 2005 |
| Marshall ES | 3550 Altadena Ave | 490 | 7.0 | 43 | 1956–1962 |
| Oak Park ES | 2606 54th St | 530 | 7.6 | 44 | 1952–2003 |
| Rolando Park ES | 6620 Marlowe Dr | 209 | 11.5 | 21 | 1952–2006 |
| **Middle Schools** | | | | | |
| Mann MS** | 4345 54th St | 771 | 24.5 | 52 | 1952–2004 |
| **High Schools** | | | | | |
| Crawford HS | 4191 Colts Way | 1,125 | 26.9 | 70 | 1957–1962 |
| **Atypical/Alternative Schools** | | | | | |
| Language Academy K–8[1, **] | 4961 64th St | 1,006 | 8.0 | 42 | 1952–2013 |
| **Charter Schools** | | | | | |
| City Heights Prep 6–11* | 3770 Altadena Ave | 118 | -- | -- | -- |
| Darnall K–8 | 6020 Hughes St | 655 | 16.2 | 26 | 1953–2003 |
| Iftin K–8 | 5465 El Cajon Blvd | 349 | 3.2 | 22 | 1942–2004 |
| Tubman Village K–8 | 6880 Mohawk St | 405 | 4.2 | 16 | 1940–2001 |

[1] School located within the Clay-Hardy Optional Area, and therefore is included in both clusters.

[2] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School not located on District property but the school's charter was authorized by the District.

** School site has an existing, active joint-use agreement with the City.


Clay
Rolando Park
Mann
Euclid
Ibarra
Fay
Crawford
Marshall
Carver
Oak Park
CHALLES VALLEY
El Cajon Blvd
Monroe Ave
Trojan Ave
University Ave
Streamview Dr
Thorn St
College Grove Dr
Federal Blvd
Mallard St
Monte Zuma Rd
Mohawk St
Amherst
Redwood St
Laurel St
Pirotte Dr
Tooley St
Radio Dr
Klauber Ave
Cholla Creek
San Diego State University
Chollas Community Park
Clay Park
Oak Park
Fay Park Golf Course
Marketplace at the Grove
483 ft NB San Diego Chollas Heights HSG
Hoover High
Central
Helix Hig
Cluster Boundaries
School Type
Elementary School
High School
Middle School
Source: Imagery-ESRI Street Map (2018)
0
0.25
0.5
Miles
N
ICF
Santee
El Cajon
San Diego
Chula Vista
Figure 2-3
Schools within Crawford Cluster

### 2.2.2.3 Henry High School Cluster

The Henry High School Cluster is primarily within the Navajo Community in the eastern portion of the City of San Diego. The western portion of the Henry High School Cluster is within the Tierrasanta, Mission Valley, and Kensington-Talmadge communities, while the southern portion is within the College Area Community. The cluster primarily consists of single-family homes, but also includes multi-family, commercial, and industrial land uses. Lake Murray and Mission Trails Regional Park are located in the eastern portion of the cluster. Table 2-3 details and Figure 2-4 depicts the schools physically located within the Henry High School Cluster.

**Table 2-3. Henry High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[2] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Benchley/Weinberger ES | 6269 Twin Lake Dr | 562 | 9.6 | 25 | 1963–2003 |
| Dailard ES* | 6425 Cibola Rd | 531 | 10.1 | 24 | 1976 |
| Foster ES | 6550 51st St | 414 | 12.4 | 27 | 1956–2003 |
| Gage ES* | 6811 Bisby Lake Ave | 576 | 11.7 | 33 | 1963–2003 |
| Green ES | 7030 Wandermere Dr | 451 | 8.8 | 20 | 1976 |
| Hardy ES* | 5420 Montezuma Rd | 347 | 5.4 | 19 | 1957 |
| Hearst ES* | 6230 Del Cerro Blvd | 513 | 9.2 | 20 | 1959–2002 |
| Marvin ES* | 5720 Brunswick Ave | 520 | 8.9 | 25 | 1958–2003 |
| **Middle Schools** | | | | | |
| Lewis MS* | 5170 Greenbrier Ave | 1,061 | 21.4 | 45 | 1959 |
| Pershing MS* | 8204 San Carlos Dr | 693 | 25.9 | 38 | 1964–1968 |
| **High Schools** | | | | | |
| Henry HS | 6702 Wandermere Dr | 2,433 | 36.4 | 97 | 1969–1994 |
| **Atypical/Alternative School** | | | | | |
| Language Academy K–8[1] | 4961 64th St | 1,006 | 8.0 | 46 | 1952–2013 |
| **Charter Schools** | | | | | |
| Magnolia Science Academy 6–8 | 6525 Estrella Ave | 410 | 3.6 | 18 | 2016 |

[1] School located within the Clay-Hardy Optional Area, and therefore is included in both clusters.

[2] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School site has an existing, active joint-use agreement with the City.

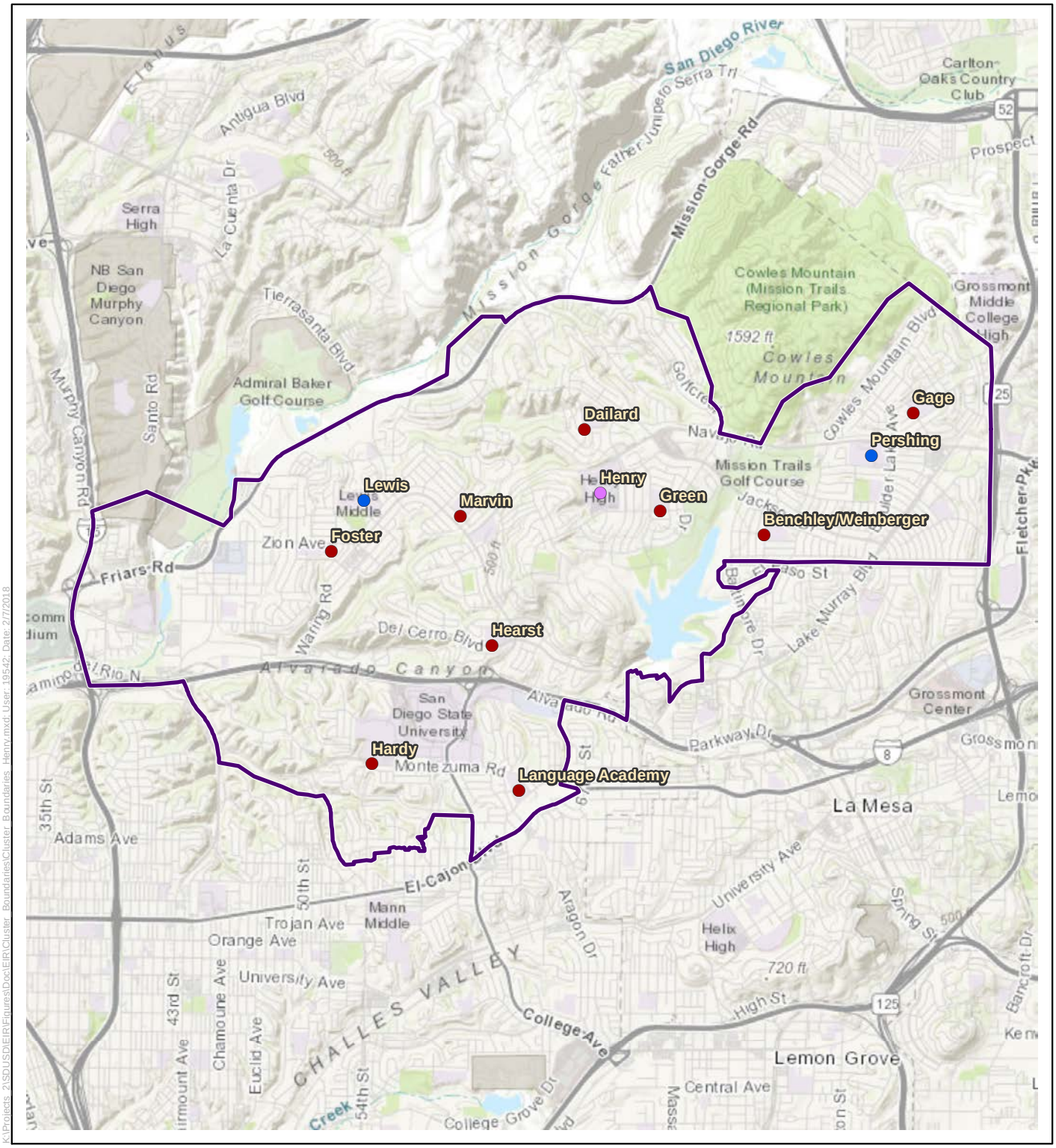



**Figure 2-4**
**Schools within Henry Cluster**

### 2.2.2.4 Hoover High School Cluster

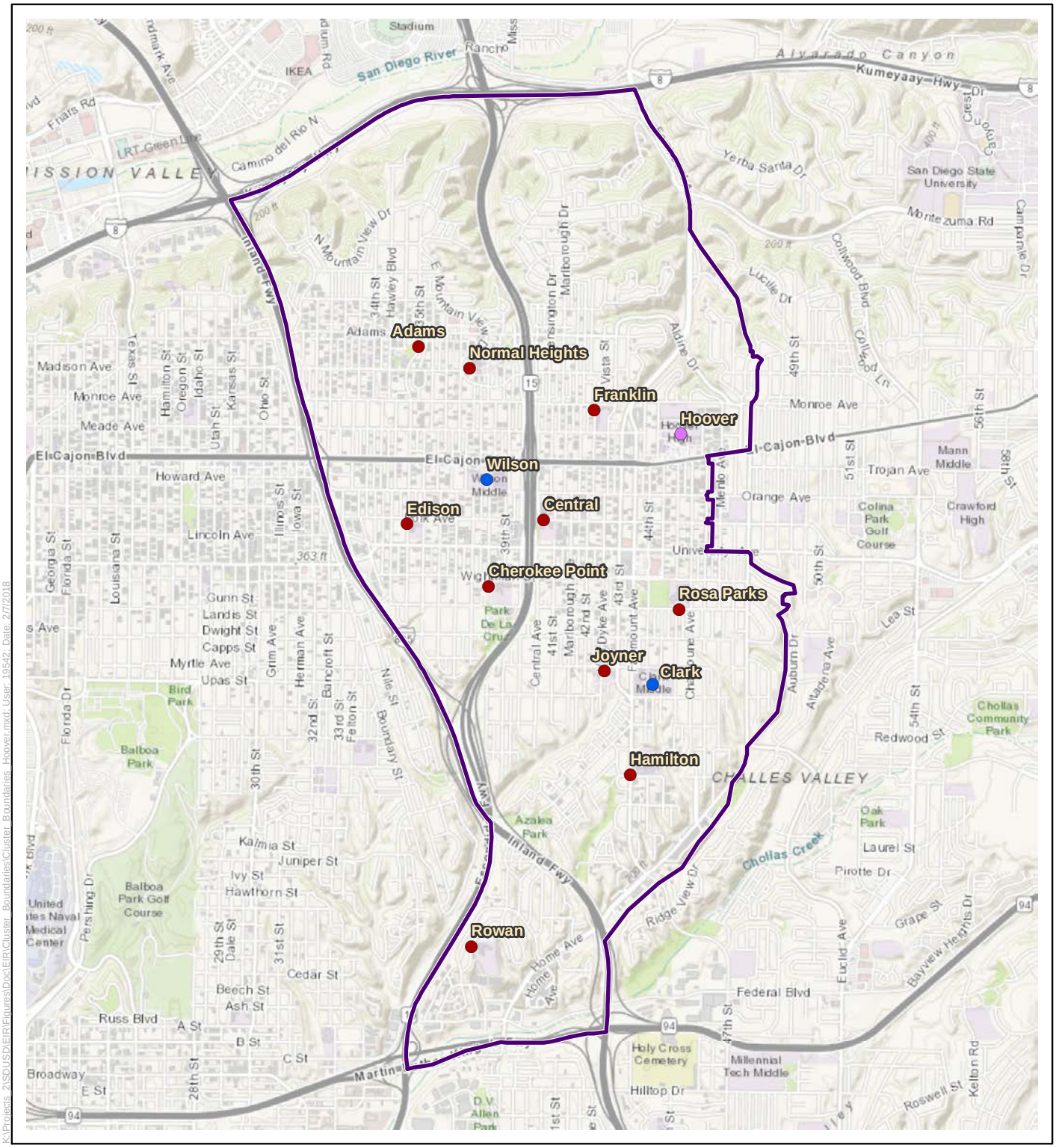
The Hoover High School Cluster is primarily within the City Heights Community in the central portion of the City of San Diego. Northern portions of the Hoover High School Cluster are located in the Normal Heights and Kensington-Talmadge communities. All of these communities make up the greater Mid-City area, and are part of the Mid-City Communities Plan. The cluster is within an urbanized area characterized predominantly by single- and multi-family residences. Other surrounding land uses include industrial, park and recreation, and institutional. El Cajon Boulevard and University Avenue serve as commercial and mixed-use corridors. Public viewpoints are located along University Avenue, which offers framed views of the mountains to the east and notable architecture present along the corridor. Table 2-4 details and Figure 2-5 depicts the schools physically located within the Hoover High School Cluster.

**Table 2-4. Hoover High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[1] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Adams ES | 4672 35th St | 291 | 4.6 | 20 | 1961–2004 |
| Central ES | 4063 Polk Ave | 664 | 4.4 | 51 | 1938–1993 |
| Cherokee Point ES* | 3735 38th St | 391 | 6.9 | 32 | 2005 |
| Edison ES** | 4077 35th St | 406 | 3.9 | 37 | 1941–2005 |
| Franklin ES* | 4481 Copeland Ave | 378 | 4.0 | 22 | 1934–2005 |
| Hamilton ES | 2807 Fairmont Ave | 505 | 6.7 | 37 | 1952–2003 |
| Joyner ES* | 4271 Myrtle Ave | 570 | 4.7 | 32 | 2007 |
| Normal Heights ES* | 3750 Ward Rd | 344 | 5.5 | 28 | 2006 |
| Rosa Parks ES* | 4510 Landis St | 919 | 6.3 | 56 | 1997–2014 |
| Rowan ES | 1755 Rowan St | 229 | 6.8 | 21 | 1955–2003 |
| **Middle Schools** | | | | | |
| Clark MS* | 4388 Thorn St | 965 | 12.9 | 63 | 1997 |
| Wilson MS | 3838 Orange Ave | 713 | 11.8 | 66 | 1944–2007 |
| **High Schools** | | | | | |
| Hoover HS | 4474 EL Cajon Blvd | 2,180 | 24.9 | 101 | 1938–2013 |
| **Atypical/Alternative Schools** | | | | | |
| None | -- | -- | -- | -- | -- |
| **Charter Schools** | | | | | |
| Health Sciences High and Middle | 3910 University Ave | 691 | 1.24 | 11 | 2002 |
| San Diego Global Vision Academy TK–8 | 4672 35th St | 386 | <0.5 | 5 | 2016 |

[1] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School site has an existing, active joint-use agreement with the City.




Cluster Boundaries

**School Type**

- Elementary School
- High School
- Middle School

Source: Imagery-ESRI Street Map (2018)

0 0.5 1 Miles

N

**Figure 2-5**
**Schools within Hoover Cluster**

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### 2.2.2.5 Kearny High School Cluster

The Kearney High School Cluster is primarily within the Kearny Mesa Community in the central portion of the City of San Diego, but also extends into the Serra Mesa, Linda Vista, and Mission Valley communities. The cluster is within an urbanized area characterized predominantly by industrial, retail, and office space. Other surrounding land uses include single- and multi-family residences, commercial recreation, and general commercial. Commercial corridors exist along Clairemont Mesa Boulevard and Convoy Street. Montgomery Field is an airport facility encompassing 539 acres of land in the southern portion of the Kearny Mesa Community. The eastern portion of the cluster is located in the Serra Mesa Community, which is primarily an urbanized residential environment. Land uses in the Linda Vista Community are primarily single- and multi-family residences, with commercial areas along Linda Vista Road and in the southwestern portion of the cluster. The southern portion of the cluster is located in the northern portion of the Mission Valley Community. Land uses in this portion of the cluster include multi-use, residential, commercial retail, commercial office, and business/industrial. Table 2-5 details and Figure 2-6 depicts the schools physically located within the Kearny High School Cluster.

**Table 2-5. Kearny High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[3] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Angier ES** | 8450 Hurlburt St | 475 | 7.4 | 27 | 1953–2002 |
| Carson ES** | 6905 Kramer St | 379 | 6.7 | 34 | 1942–2003 |
| Chesterton ES | 7335 Wheatley St | 448 | 8.8 | 28 | 1959–1976 |
| Cubberley ES** | 3201 Marathon Dr | 175 | 9.1 | 11 | 1959–2003 |
| Fletcher ES** | 7666 Bobolink Way | 163 | 8.2 | 18 | 1960–2004 |
| Jones ES | 2751 Greyling Dr | 304 | 9.3 | 23 | 1958–2004 |
| Juarez ES** | 2633 Melbourne Dr | 275 | 8.8 | 19 | 1961–2003 |
| Linda Vista ES** | 2772 Ulric St | 354 | 6.8 | 35 | 1943–2004 |
| Ross ES | 7470 Bagdad St | 211 | 9.2 | 22 | 1959–2004 |
| Wegeforth ES** | 3443 Ediwhar Ave | 213 | 9.0 | 18 | 1958–2004 |
| **Middle Schools** | | | | | |
| Montgomery MS** | 2470 Ulric St | 458 | 12.8 | 43 | 1943–2004 |
| Taft MS | 9191 Gramercy Dr | 463 | 16.3 | 27 | 1962–1968 |
| **High Schools** | | | | | |
| Kearny HS Complex | 1954 Komet Way | 1,449 | 34.3 | 72 | 1954–2014 |
| **Atypical/Alternative Schools** | | | | | |
| San Diego Met HS* | 7250 Mesa College Dr | 134 | -- | -- | -- |
| Twain Main HS | 6402 Linda Vista Rd | 356 | 6.2 | 25 | 1954–2003 |
| **Charter Schools** | | | | | |
| Elevate ES* | 2285 Murray Ridge Rd | 317 | -- | -- | -- |
| Empower K–6[1] | 2772 Ulric St | 143 | -- | 8 | 1943–2004 |
| Kavod ES[2] | 3201 Marathon Dr | 217 | -- | 7 | -- |
| San Diego Cooperative | 7260 Linda Vista Rd | 735 | 4.3 | 19 | 1966–2009 |

| School | Address | 2018–2019 Enrollment | Site Acreage[3] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| School for Entrepreneurship and Technology* | 3540 Aero Court | 184 | -- | -- | -- |

[1] Empower currently serves Grades K–6 at a private site located at 2230 East Jewett Street (92111), and at a co-located site with Linda Vista Elementary. Both sites are within the attendance boundaries of Linda Vista Elementary, Montgomery Middle, and Kearny High School. Site acreage is the same as Linda Vista Elementary (see Table 2-5).

[2] Located on Cubberley Elementary School's campus.

[3] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School not located on District property but the school's charter was authorized by the District. In the case of San Diego Met High School, the District leases the property from the San Diego Community College District and operates the facilities onsite.

** School site has an existing, active joint-use agreement with the City.

### 2.2.2.6 La Jolla High School Cluster

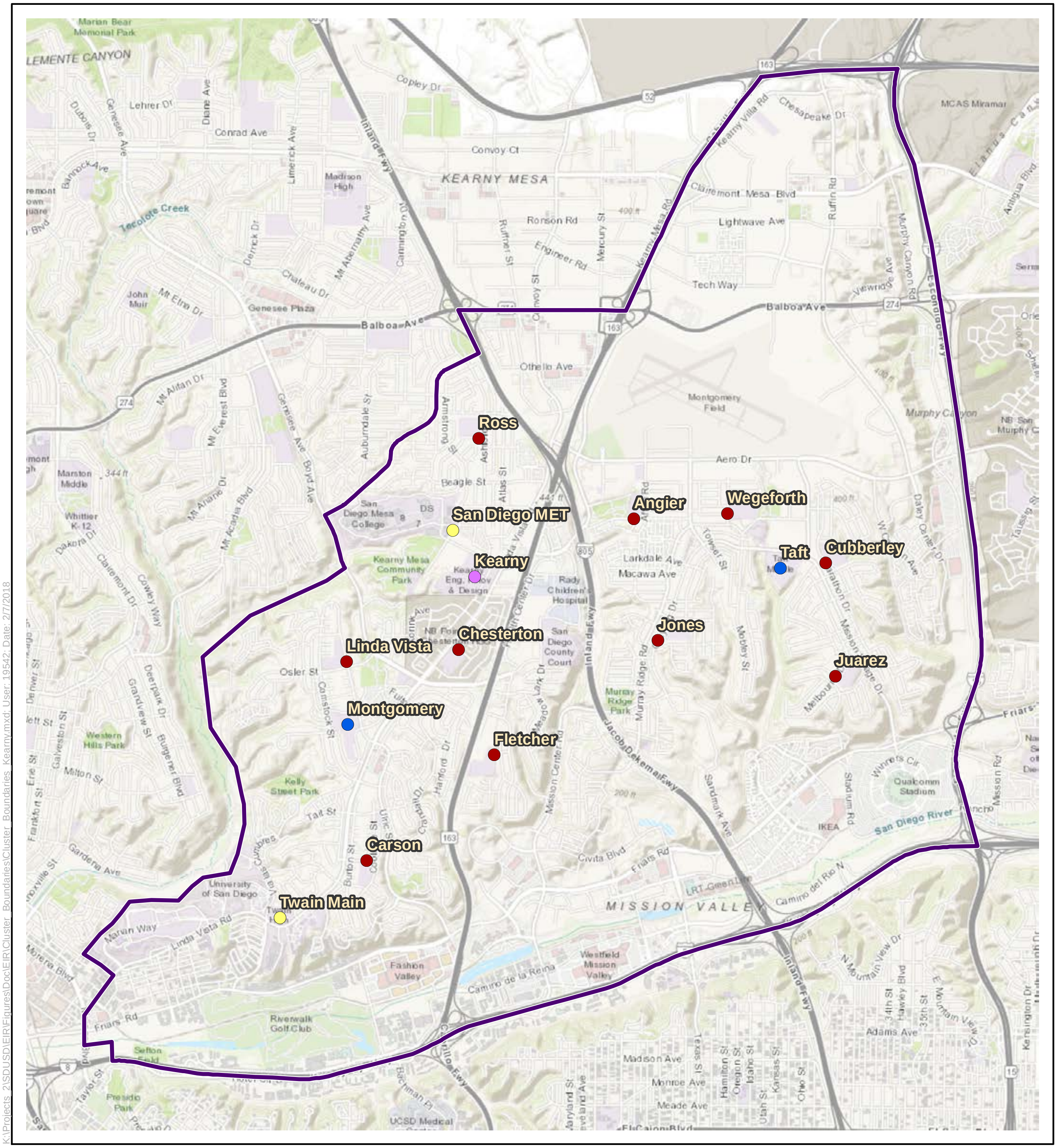
The La Jolla High School Cluster is within the La Jolla Community in the western portion of the City of San Diego. The cluster is within an urbanized area characterized predominantly by single- and multi-family residences. Other surrounding land uses include commercial in the Village area, and parks and open space. Table 2-6 details and Figure 2-7 depicts the schools physically located within the La Jolla High School Cluster.

**Table 2-6. La Jolla High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[1] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Bird Rock ES* | 5371 La Jolla Hermosa Ave | 449 | 3.9 | 22 | 1952–2005 |
| La Jolla ES | 1111 Marine St | 569 | 7.2 | 27 | 1942–2004 |
| Torrey Pines ES* | 8350 Cliffridge Ave | 475 | 8.1 | 22 | 1963–2003 |
| **Middle Schools** | | | | | |
| Muirlands MS | 1056 Nautilus St | 925 | 11.3 | 41 | 1963 |
| **High Schools** | | | | | |
| La Jolla HS | 750 Nautilus St | 1,410 | 14.4 | 58 | 1940–2000 |
| **Atypical/Alternative Schools** | | | | | |
| None | -- | -- | -- | -- | -- |
| **Charter Schools** | | | | | |
| None | -- | -- | -- | -- | -- |

[1] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School site has an existing, active joint-use agreement with the City.







Cluster Boundaries

**School Type**

- Atypical School
- Elementary School
- High School
- Middle School

Source: Imagery-ESRI Street Map (2018)

N

0 0.5 1 Miles

**Figure 2-6**
**Schools within Kearny Cluster**

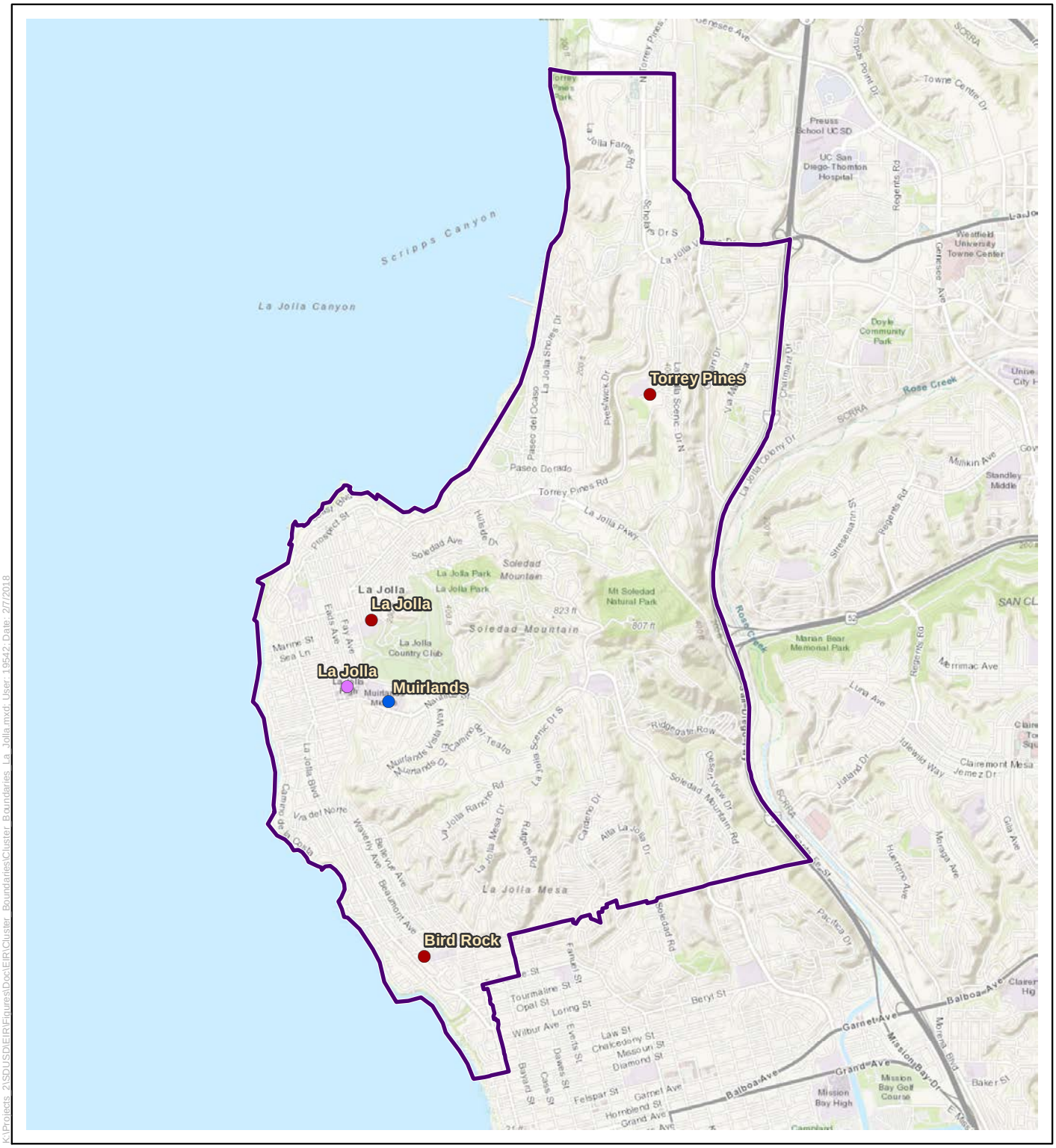



**Figure 2-7**
**Schools within La Jolla Cluster**

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### 2.2.2.7 Lincoln High School Cluster

The Lincoln High School Cluster is primarily within the Southeastern San Diego Community in the southern portion of the City of San Diego. Northern portions of the Lincoln High School Cluster are located in the Mid-City Community, while the eastern portion is within the Encanto Neighborhood Community. The cluster is within an urbanized area characterized predominantly by single- and multi-family residences. Other surrounding land uses include industrial, park and recreation, and institutional. Commercial Street and Imperial Avenue within the Southeastern San Diego Community are commercial corridors and include community mixed-use designations. Market Street in the Encanto Neighborhood Community is primarily a commercial corridor. Chollas Creek is located in the central part of the community and cluster, providing active recreational space. Table 2-7 details and Figure 2-8 depicts the schools physically located within the Lincoln High School Cluster.

**Table 2-7. Lincoln High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[4] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Baker ES | 4041 T St | 432 | 6.1 | 35 | 1964–2002 |
| Balboa ES | 1844 S 40th St | 523 | 5.8 | 44 | 1949–1998 |
| Chavez ES* | 1404 S 40th St | 504 | 7.8 | 35 | 1998–2014 |
| Chollas/Mead ES* | 401 N 45th St | 625 | 14.5 | 47 | 1954–2005 |
| Encanto ES* | 822 65th St | 488 | 7.8 | 52 | 1939–2013 |
| Horton ES* | 5050 Guymon St | 408 | 8.0 | 34 | 1958–2003 |
| Johnson ES | 1355 Kelton Rd | 313 | 8.2 | 30 | 1963 |
| Nye ES | 981 Valencia Parkway | 410 | 9.9 | 31 | 1992 |
| Porter ES (North and South) | 4800 T St | 843 | 13.8 | 52 | 2006–2007 |
| Valencia Park ES* | 5880 Skyline Dr | 541 | 13.2 | 42 | 1953–2004 |
| Webster ES | 4801 Elm St | 258 | 7.6 | 30 | 1955–2005 |
| **Middle Schools** | | | | | |
| Knox MS | 1098 S 49th St | 641 | 7.2 | 33 | 1958–2013 |
| Millennial Tech MS[1] | 1110 Carolina Lane | 452 | 32.5 | 30 | 1962–1977 |
| **High Schools** | | | | | |
| Lincoln HS | 4777 Imperial Ave | 1,576 | 24.4 | 115 | 1956–2007 |
| **Atypical/Alternative Schools** | | | | | |
| None | -- | -- | -- | -- | -- |
| **Charter Schools** | | | | | |
| America's Finest | 730 45th St | 447 | -- | -- | -- |
| Gompers Prep[1] | 1005 47th St | 1,318 | 32.5 | 22 | 1955–2004 |
| Holly Drive Leadership Academy[2] | 4801 Elm St | 129 | -- | 10 | -- |
| Ingenuity[3] | 6130 Skyline Dr | 216 | -- | | -- |
| O'Farrell Community School | 6130 Skyline Dr | 1,155 | 27.3 | 84 | 1960–2016 |

| School | Address | 2018–2019 Enrollment | Site Acreage[4] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|

[1] Millennial Tech MS and Gompers Prep share a campus.

[2] Shares a campus with Webster Elementary.

[3] Ingenuity is an independent study school and therefore does not have a typical classroom setting. This school and O'Farrell Community School are collocated on the same campus and share classroom space.

[4] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School site has an existing, active joint-use agreement with the City.

### 2.2.2.8 Madison High School Cluster

The Madison High School Cluster is within the northern portion of the Clairemont Mesa Community in the central portion of the City of San Diego. The cluster is within an urbanized area characterized predominantly by single- and multi-family residences. Other surrounding land uses include commercial, industrial, park and recreation, and institutional. Parkland areas present within the cluster, as designated in the Clairemont Mesa Community Plan, include Marian Bear Memorial Park and Stevenson Canyon. Table 2-8 details and Figure 2-9 depicts the schools physically located within the Madison High School Cluster.

**Table 2-8. Madison High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[1] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Field ES* | 4375 Bannock Ave | 322 | 8.2 | 23 | 1955–2003 |
| Hawthorne ES | 4750 Lehrer Dr | 263 | 9.9 | 24 | 1958–2005 |
| Lafayette ES | 6125 Printwood Way | 323 | 12.4 | 32 | 1965 |
| Lindbergh/Schweitzer ES | 4133 Mt. Albertine Ave | 385 | 17.95 | 50 | 1962–2004 |
| Sequoia ES | 4690 Limerick Ave | 190 | 11.0 | 21 | 1961 |
| Whitman ES | 4050 Appleton St | 147 | 9.5 | 25 | 1958–2004 |
| **Middle Schools** | | | | | |
| Innovation MS | 5095 Arvinels Ave | 489 | 10.1 | 30 | 1962–2004 |
| **High Schools** | | | | | |
| Madison HS | 4833 Doliva Dr | 975 | 47.4 | 73 | 1963–2011 |
| **Atypical/Alternative Schools** | | | | | |
| CPMA MS** | 5050 Conrad Ave | 942 | 24.0 | 57 | 1962–2015 |
| **Charter Schools** | | | | | |
| None | -- | -- | -- | -- | -- |

[1] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School site has an existing, active joint-use agreement with the City.

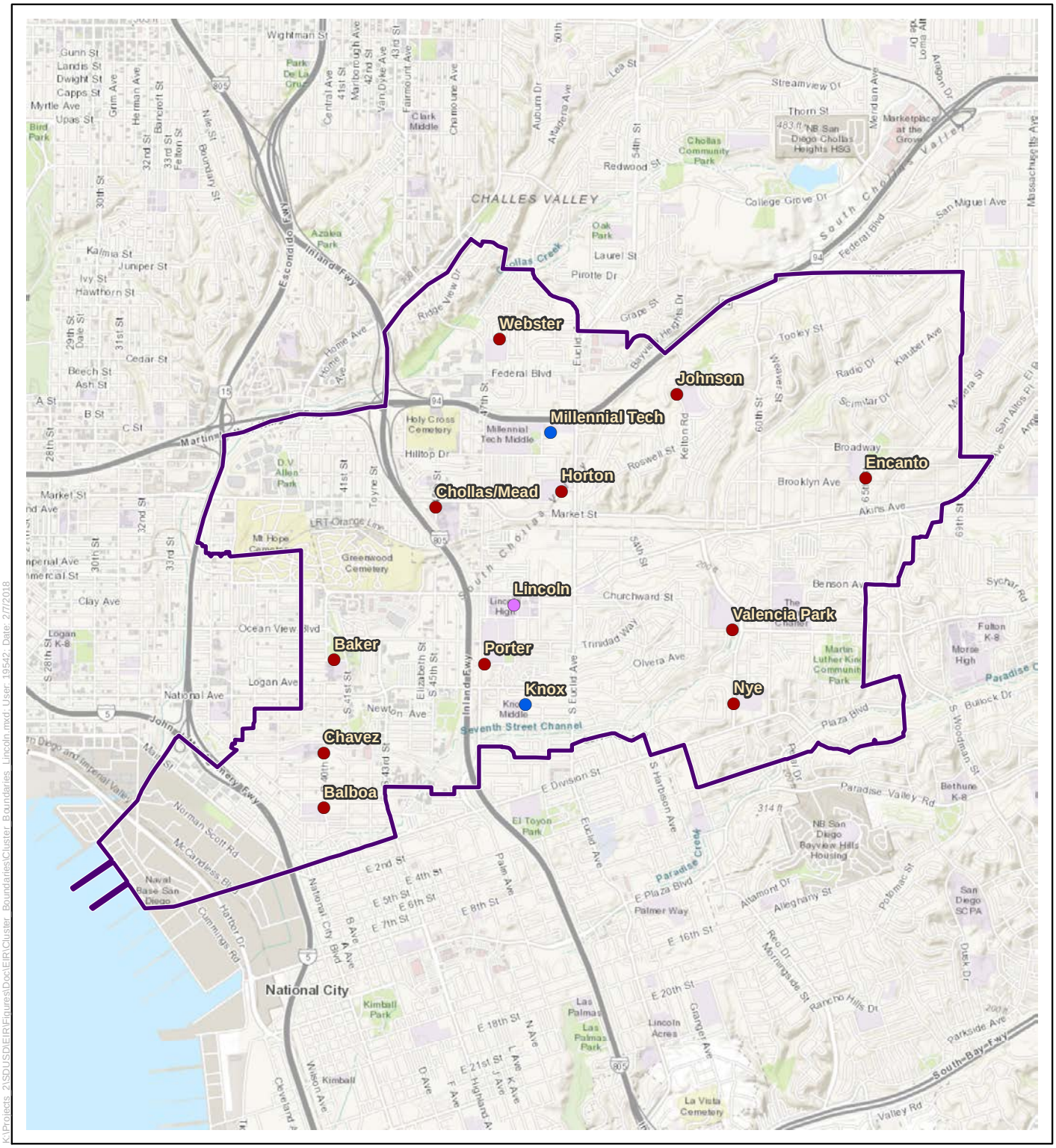
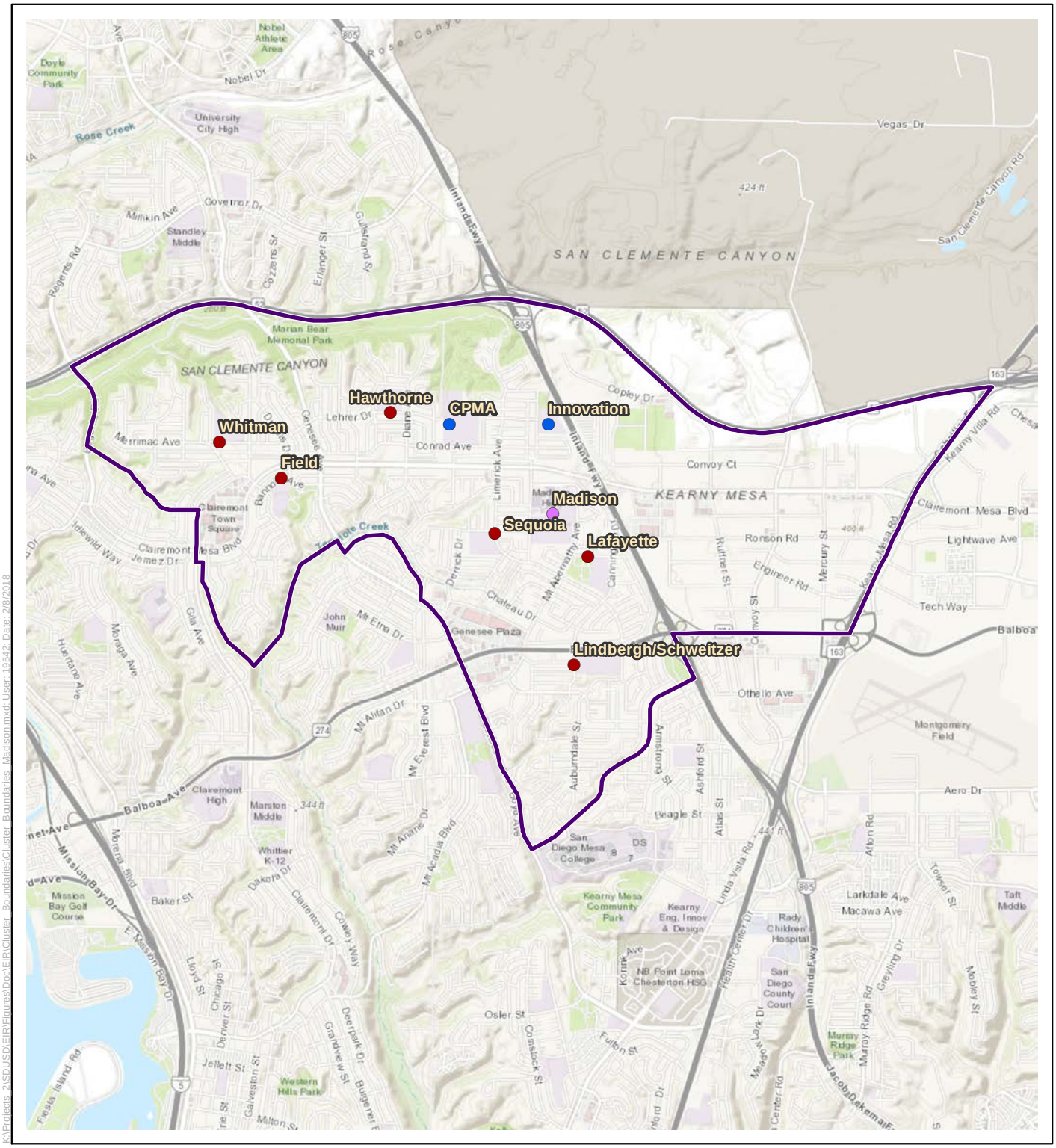



**Figure 2-8**
**Schools within Lincoln Cluster**




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**Figure 2-9**
**Schools within Madison Cluster**

### 2.2.2.9 Mira Mesa High School Cluster

The Mira Mesa High School Cluster is within the northern portion of the Mira Mesa Community in the northern portion of the City of San Diego. The cluster is within an urbanized area characterized predominantly by single- and multi-family residences. Other surrounding land uses include open space in the northern portion, industrial in the lower western portion, and commercial areas along Mira Mesa Boulevard. Los Peñasquitos Canyon is located in the northern portion of the cluster. Table 2-9 details and Figure 2-10 depicts the schools physically located within the Mira Mesa High School Cluster.

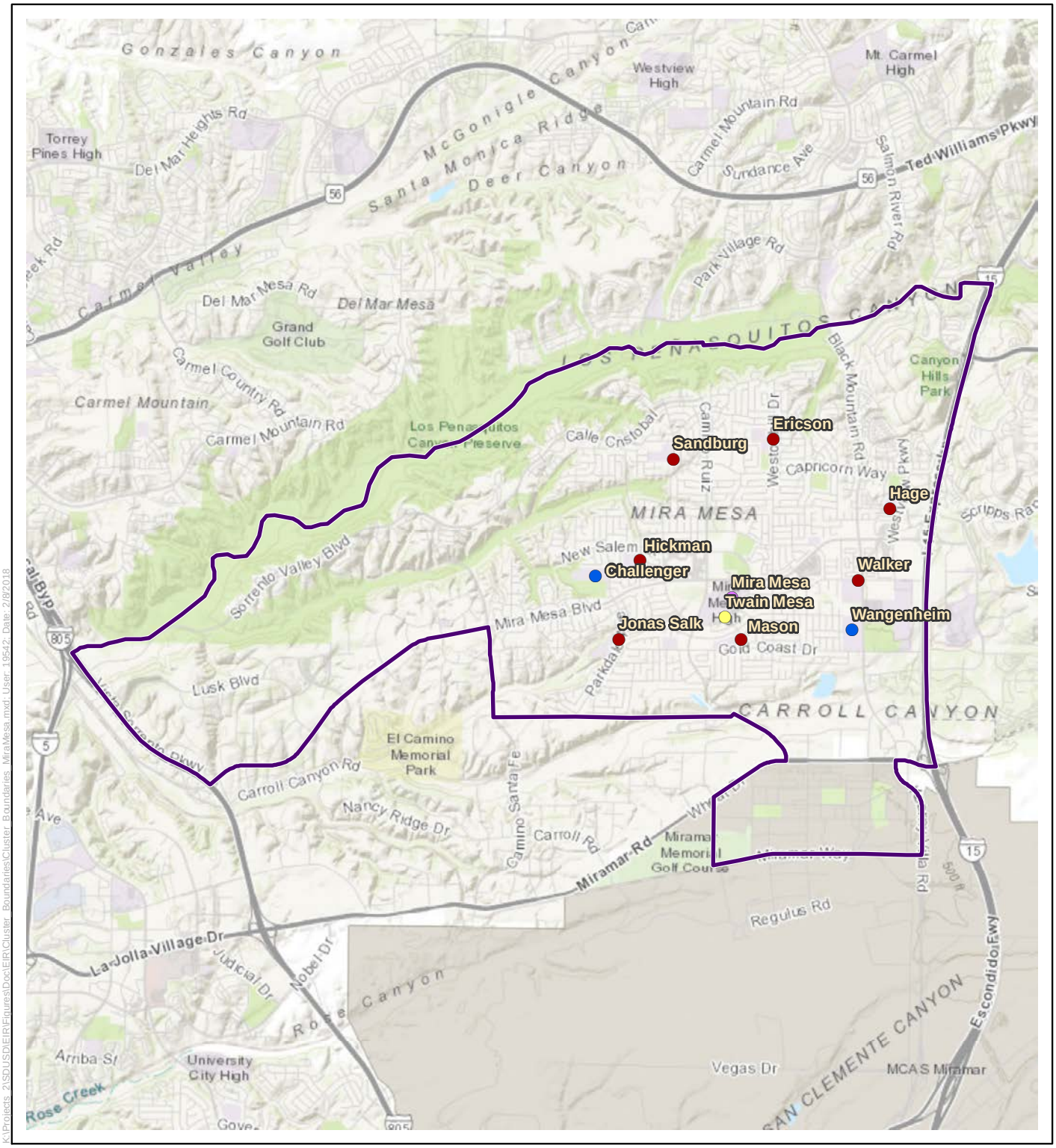
**Table 2-9. Mira Mesa High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[2] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Ericson ES* | 11174 Westonhill Dr | 715 | 13.9 | 43 | 1976 |
| Hage ES | 9750 Galvin Ave | 703 | 9.2 | 40 | 1991 |
| Hickman ES | 10850 Montongo St | 425 | 9.4 | 33 | 1977 |
| Jonas Salk ES | 7825 Flanders Dr | 710 | 11.4 | 32 | 2015 |
| Mason ES* | 10340 San Ramon Dr | 531 | 9.8 | 35 | 1975 |
| Sandburg ES | 11230 Avenida del Gato | 539 | 9.6 | 35 | 1976 |
| Walker ES* | 9225 Hillery Dr | 400 | 11.8 | 33 | 1976 |
| **Middle Schools** | | | | | |
| Challenger MS* | 10810 Parkdale Ave | 947 | 15.2 | 50 | 1990–1993 |
| Wangenheim MS | 9230 Gold Coast Dr | 917 | 30.5 | 55 | 1978–1996 |
| **High Schools** | | | | | |
| Mira Mesa HS | 10510 Marauder Way | 2,411 | 48.6 | 110 | 1977–2004 |
| **Atypical/Alternative Schools** | | | | | |
| Twain Mesa Satellite HS[1] | 10444 Marauder Way | -- | -- | 7 | -- |
| **Charter Schools** | | | | | |
| None | -- | -- | -- | -- | -- |

[1] Satellite campus that serves the Twain Main High School. Enrollment and site acreage is included with the Twain Main Campus in the Linda Vista Cluster (Table 2-5).

[2] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School site has an existing, active joint-use agreement with the City.




Cluster Boundaries

**School Type**

- Atypical School
- Elementary School
- High School
- Middle School




Source: Imagery-ESRI Street Map (2018)

0 0.5 1 Miles

N

**Figure 2-10**
**Schools within Mira Mesa Cluster**

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### 2.2.2.10 Mission Bay High School Cluster

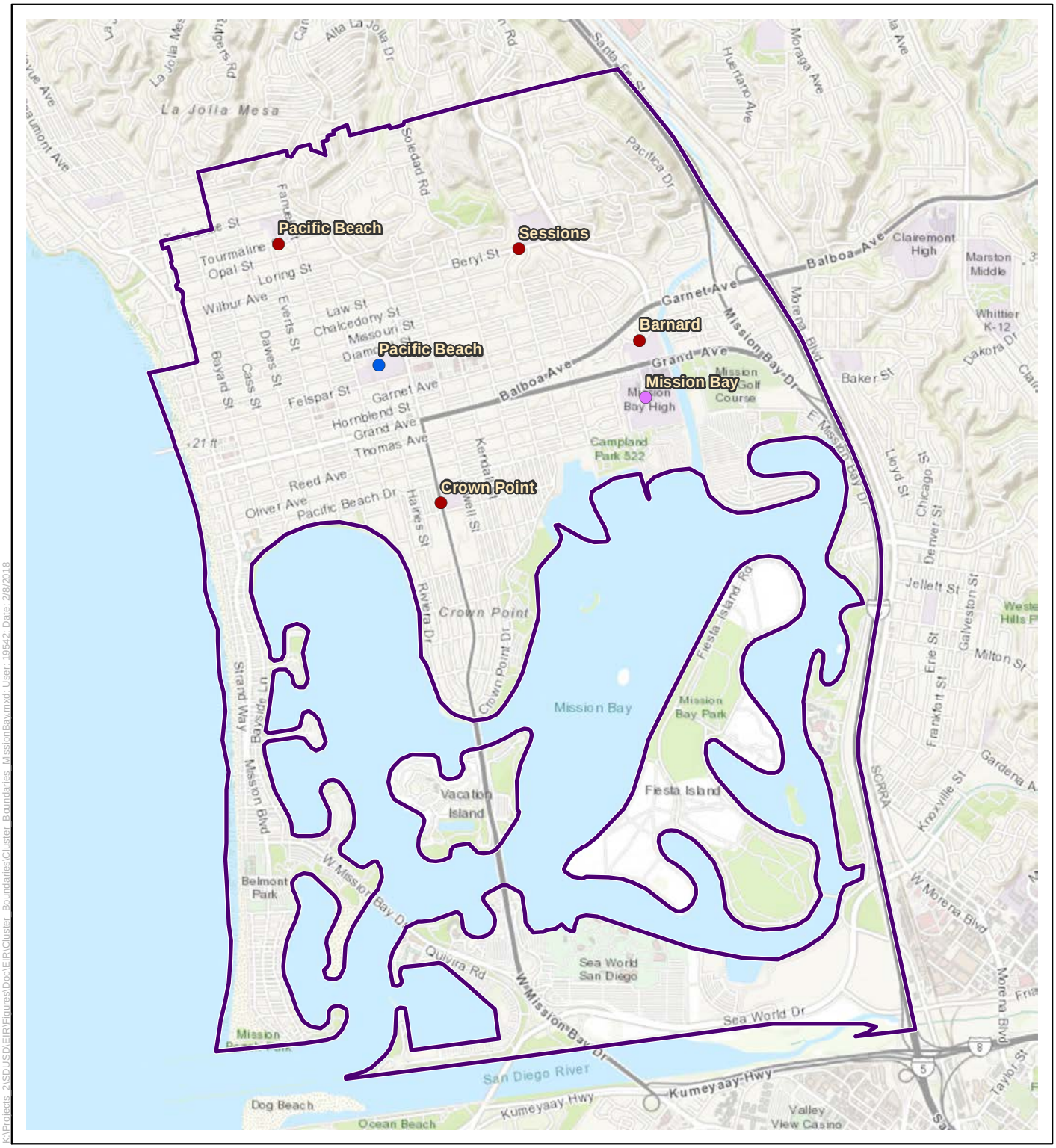
The Mission Bay High School Cluster is within the communities of Pacific Beach, Mission Bay Park, and Mission Beach in the central western portion of the City of San Diego. However, all schools in the cluster are located in the Pacific Beach Community. The cluster is within an urbanized area characterized predominantly by single- and multi-family residences. Other surrounding land uses include open space in the northern portion of the cluster, and commercial uses along Grand Avenue, Cass Street, and Mission Boulevard. As detailed in the Pacific Beach Community Plan, the cluster includes public scenic views of the Pacific Ocean and Mission Bay. Parkland resources within the cluster include the Northern Wildlife Preserve and Kate Sessions Park. Table 2-10 details and Figure 2-11 depicts the schools physically located within the Mission Bay High School Cluster.

**Table 2-10. Mission Bay High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[1] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Crown Point Junior Music Academy * | 4033 Ingraham St | 314 | 6.1 | 19 | 1948–2003 |
| Pacific Beach ES* | 1234 Tourmaline St | 387 | 8.2 | 18 | 1975 |
| Sessions ES | 2150 Beryl St | 517 | 9.8 | 25 | 1956–2003 |
| **Middle Schools** | | | | | |
| Pacific Beach MS | 4676 Ingraham St | 747 | 13.5 | 42 | 1936–1956 |
| **High Schools** | | | | | |
| Mission Bay HS | 2475 Grand Ave | 1,121 | 35.8 | 77 | 1953–2015 |
| **Atypical/Alternative Schools** | | | | | |
| Barnard Asian Pacific Language Academy* | 2445 Fogg St | 518 | 9.6 | 27 | 1958–1960 |
| **Charter Schools** | | | | | |
| None | -- | -- | -- | -- | -- |

[1] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School site has an existing, active joint-use agreement with the City.




Cluster Boundaries

**School Type**

- Elementary School
- High School
- Middle School

Source: Imagery-ESRI Street Map (2018)

0 0.25 0.5 Miles

N

**Figure 2-11**
**Schools within Mission Bay Cluster**

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### 2.2.2.11 Morse High School Cluster

The Morse High School Cluster is within the Skyline-Paradise Hills Community in the southeastern portion of the City of San Diego. The cluster is within an urbanized area characterized predominantly by single- and multi-family residences. Other surrounding land uses include open space and small sections of commercial. Table 2-11 details and Figure 2-12 depicts the schools physically located within the Morse High School Cluster.

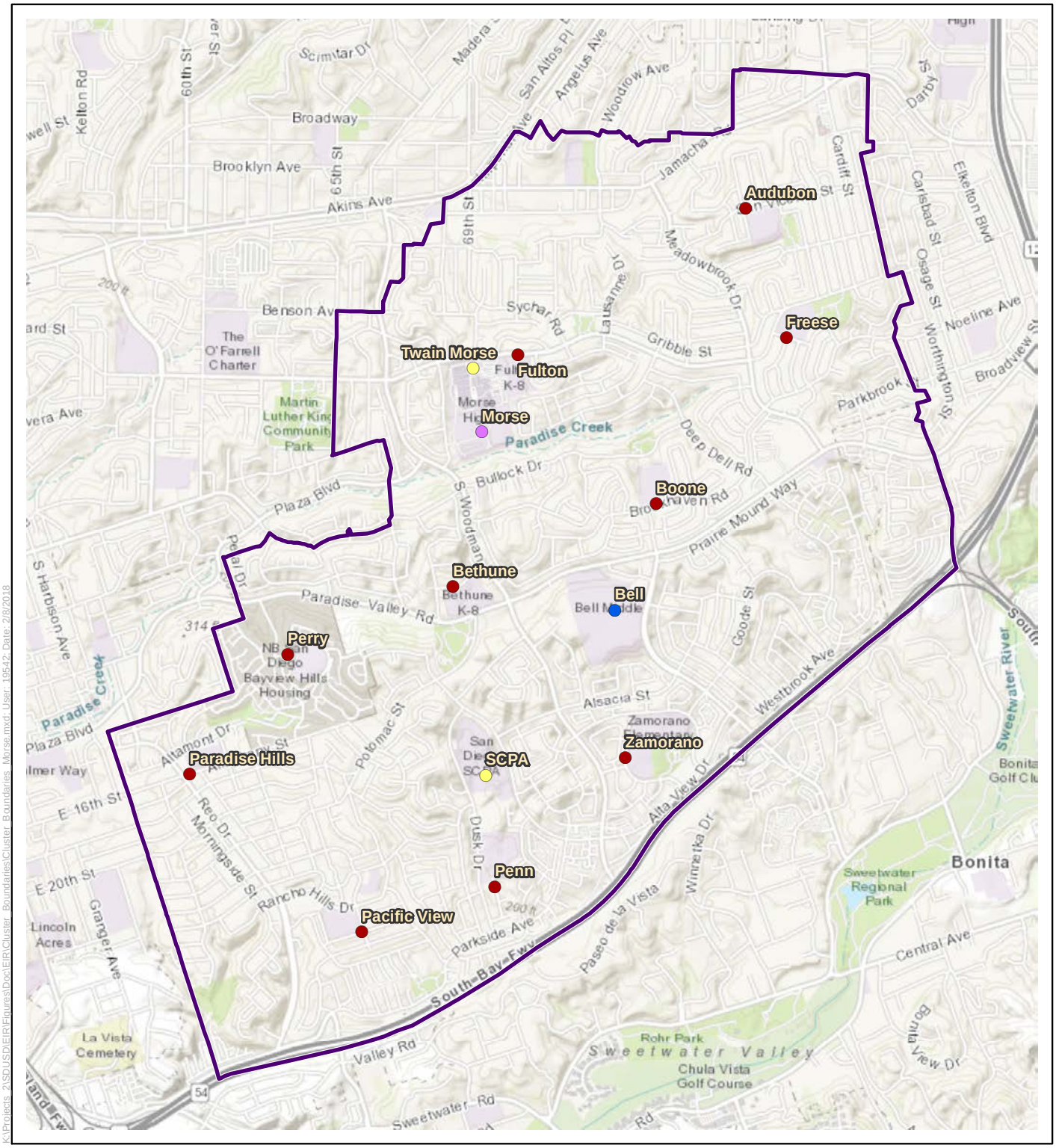
**Table 2-11. Morse High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[2] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Boone ES | 7330 Brookhaven Rd | 440 | 8.9 | 36 | 1962–2004 |
| Freese ES | 8140 Greenlawn Dr | 295 | 8.7 | 28 | 1961–2004 |
| Pacific View Leadership ES | 6196 Childs Ave | 279 | 8.3 | 26 | 1959–2004 |
| Paradise Hills ES | 5816 Alleghany St | 330 | 5.9 | 31 | 1946–2002 |
| Penn ES** | 2797 Utica Dr | 404 | 14.8 | 29 | 1976 |
| Perry ES | 6290 Oriskany Rd | 382 | 6.7 | 23 | 1955–2003 |
| Zamorano ES** | 2655 Casey St | 1,081 | 25.4 | 65 | 1985–2007 |
| **K–8 Schools** | | | | | |
| Audubon K–8 | 8111 San Vincente St | 500 | 9.2 | 38 | 1955–2004 |
| Bethune K–8 | 6835 Benjamin Holt Rd | 615 | 8.6 | 38 | 1985 |
| Fulton K–8 | 7055 Skyline Dr | 332 | 7.6 | 36 | 1962–2004 |
| **Middle Schools** | | | | | |
| Bell MS | 620 Briarwood Rd | 707 | 35.2 | 61 | 1969–2015 |
| **High Schools** | | | | | |
| Morse HS | 6905 Skyline Dr | 1,726 | 40 | 98 | 1963–2012 |
| **Atypical/Alternative Schools** | | | | | |
| San Diego School of Creative and Performing Arts 6–12 | 2425 Dusk Dr | 1,435 | 37.2 | 66 | 1992–2013 |
| Twain Morse Satellite HS[1] | 6905 Skyline Dr | -- | -- | 7 | -- |
| **Charter Schools** | | | | | |
| Keiller Leadership Academy | 7270 Lisbon St | 622 | 6.6 | 35 | 1962–2002 |

[1] Satellite campus that serves the Twain Main High School. Enrollment and site acreage is included with the Twain Main Campus in the Linda Vista Cluster (Table 2-5).

[2] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School site has an existing, active joint-use agreement with the City.




Cluster Boundaries

**School Type**

- Atypical School
- Elementary School
- High School
- Middle School




Source: Imagery-ESRI Street Map (2018)

0 0.25 0.5 Miles

N

**Figure 2-12**
**Schools within Morse Cluster**

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### 2.2.2.12 Point Loma High School Cluster

The Point Loma High School Cluster is primarily within the Peninsula Community in the western portion of the City of San Diego. The northern portion of the cluster is within the Ocean Beach Community. The cluster is characterized predominantly by single- and multi-family residences, but also includes a significant amount of military-related industry in the southern portion. Other surrounding land uses include commercial, a national cemetery, open space, public parks, and public utility uses. Most of the cluster's boundary includes coastal access. Table 2-12 details and Figure 2-13 depicts the schools physically located within the Point Loma High School Cluster.

**Table 2-12. Point Loma High School Cluster**

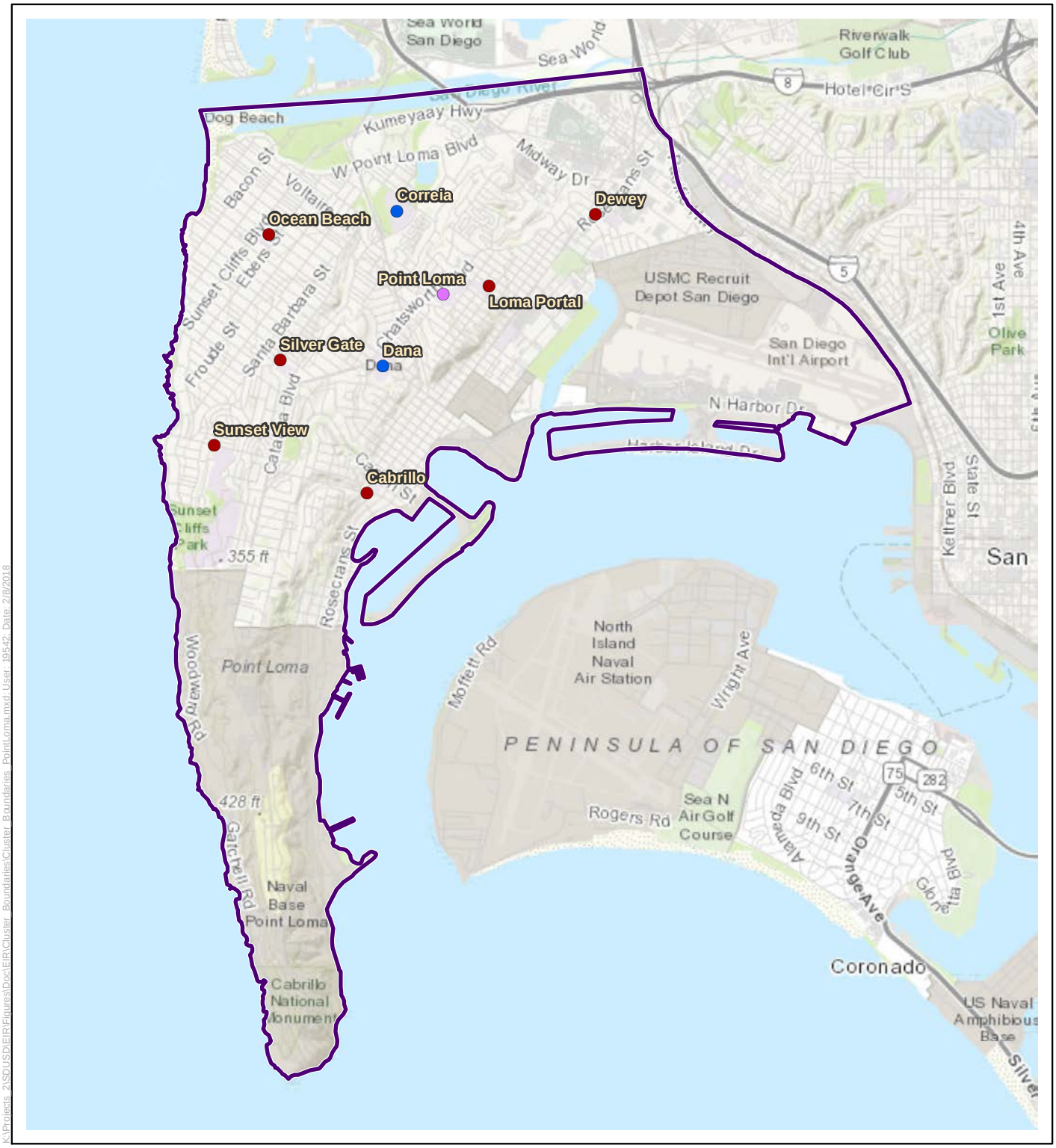
| School | Address | 2018–2019 Enrollment | Site Acreage[2] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Cabrillo ES | 3120 Talbot St | 168 | 4.7 | 16 | 1939–2005 |
| Dewey ES | 3251 Rosecrans St | 378 | 5.9 | 29 | 1943–2004 |
| Loma Portal ES | 3341 Browning St | 391 | 5.5 | 19 | 1934–1951 |
| Ocean Beach ES** | 4741 Santa Monica Ave | 410 | 4.3 | 22 | 1934–2004 |
| Silver Gate ES | 1499 Venice St | 510 | 5.4 | 27 | 1952–2004 |
| Sunset View ES | 4365 Hill St | 427 | 6.0 | 23 | 1953–2006 |
| **Middle Schools** | | | | | |
| Correia MS | 4302 Valeta St | 782 | 15.7 | 42 | 1958–2004 |
| Dana MS | 1775 Chatsworth Blvd | 754 | 10.7 | 44 | 1942–2003 |
| **High Schools** | | | | | |
| Point Loma HS | 2335 Chatsworth Blvd | 1,908 | 16.7 | 89 | 1935–2013 |
| **Atypical/Alternative Schools** | | | | | |
| iHigh Virtual Academy[1] | 3939 Conde St | 42 | 2.23 | -- | -- |
| **Charter Schools** | | | | | |
| High Tech Elementary Explorer* | 2230 Truxtun Rd | 358 | -- | -- | -- |
| High Tech ES* | 2150 Cushing Rd | 403 | -- | -- | -- |
| High Tech MS* | 2359 Truxtun Rd | 321 | -- | -- | -- |
| High Tech Middle Media Arts* | 2230 Truxtun Rd | 328 | -- | -- | -- |
| High Tech HS* | 2861 Womble Rd | 527 | -- | -- | -- |
| High Tech High Media Arts* | 2230 Truxtun Rd | 390 | -- | -- | -- |
| High Tech High International* | 2855 Farragut Rd | 393 | -- | -- | -- |
| Old Town Academy[1,*] | 2120 San Diego Ave | 250 | -- | -- | -- |

[1] School located within the Dana/Correia-Roosevelt and Point Loma-San Diego Optional Area, and therefore is included in both cluster lists.

[2] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School not located on District property but the school's charter was authorized by the District.

** School site has an existing, active joint-use agreement with the City.




Cluster Boundaries

**School Type**

- Elementary School
- High School
- Middle School

Source: Imagery-ESRI Street Map (2018)

0 0.5 1 Miles

**Figure 2-13**
**Schools within Point Loma Cluster**

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### 2.2.2.13 San Diego High School Cluster

The San Diego High School Cluster is the largest cluster in the District and encompasses several communities in the central portion of the City of San Diego: Downtown/Centre City, Uptown, North Park, Golden Hill, Southeastern San Diego, and Barrio Logan. The cluster is within an urbanized area characterized predominantly by single- and multi-family residences, as well as the commercial and residential high rises of Downtown San Diego. Other surrounding land uses throughout the cluster are commercial, industrial, and open space, including Balboa Park in the central portion. Table 2-13 details and Figure 2-14 depicts the schools physically located within the San Diego High School Cluster.

**Table 2-13. San Diego High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[3] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Birney ES** | 4345 Campus Ave | 545 | 6.6 | 27 | 1953–2003 |
| Burbank ES | 2146 Julian Ave | 410 | 3.5 | 24 | 2007 |
| Emerson/Bandini ES | 3510 Newton Ave | 424 | 6.3 | 45 | 1948–1976 |
| Florence ES | 3914 First Ave | 338 | 3.3 | 18 | 1962–2004 |
| Garfield ES | 4487 Oregon St | 328 | 4.1 | 25 | 1948 |
| Jefferson ES** | 3770 Utah St | 423 | 2.8 | 24 | 1961–2014 |
| Kimbrough ES** | 321 Hoitt St | 380 | 6.4 | 43 | 1997 |
| McKinley ES** | 3045 Felton St | 575 | 6.3 | 28 | 1945–2004 |
| Rodriguez ES** | 825 S 31st St | 449 | 6.5 | 32 | 2007 |
| Sherman ES | 301 22nd St | 660 | 6.2 | 32 | 2008 |
| Washington ES | 1789 State St | 329 | 3.4 | 20 | 1962–2014 |
| **K–8 Schools** | | | | | |
| Golden Hill K–8 | 1240 33rd St | 404 | 6.6 | 32 | 2004–2009 |
| Grant K–8 | 1425 Washington Pl | 724 | 5.4 | 33 | 1956–2004 |
| Logan K–8 | 2875 Ocean View Blvd | 435 | 6.4 | 45 | 1975 |
| Perkins K–8 | 1770 Main St | 483 | 3.4 | 30 | 1991 |
| **Middle Schools** | | | | | |
| Memorial Prep MS** | 2850 Logan Ave | 419 | 13.8 | 47 | 1943–1977 |
| Roosevelt MS** | 3366 Park Blvd | 989 | 15.0 | 58 | 1949–1976 |
| **High Schools** | | | | | |
| San Diego HS Complex | 1405 Park Blvd | 2,569 | 18.7 | 127 | 1939–2011 |
| **Atypical/Alternative Schools** | | | | | |
| ALBA 6–12** | 4041 Oregon St | 39 | 0.8 | | |
| East Village HS[1] | 1313 Park Avenue, Building B | 108 | -- | 6 | |
| Garfield HS** | 1255 16th St | 282 | 2.2 | 27 | 1975–1997 |
| iHigh Virtual Academy[2] | 3939 Conde St | 42 | -- | -- | |

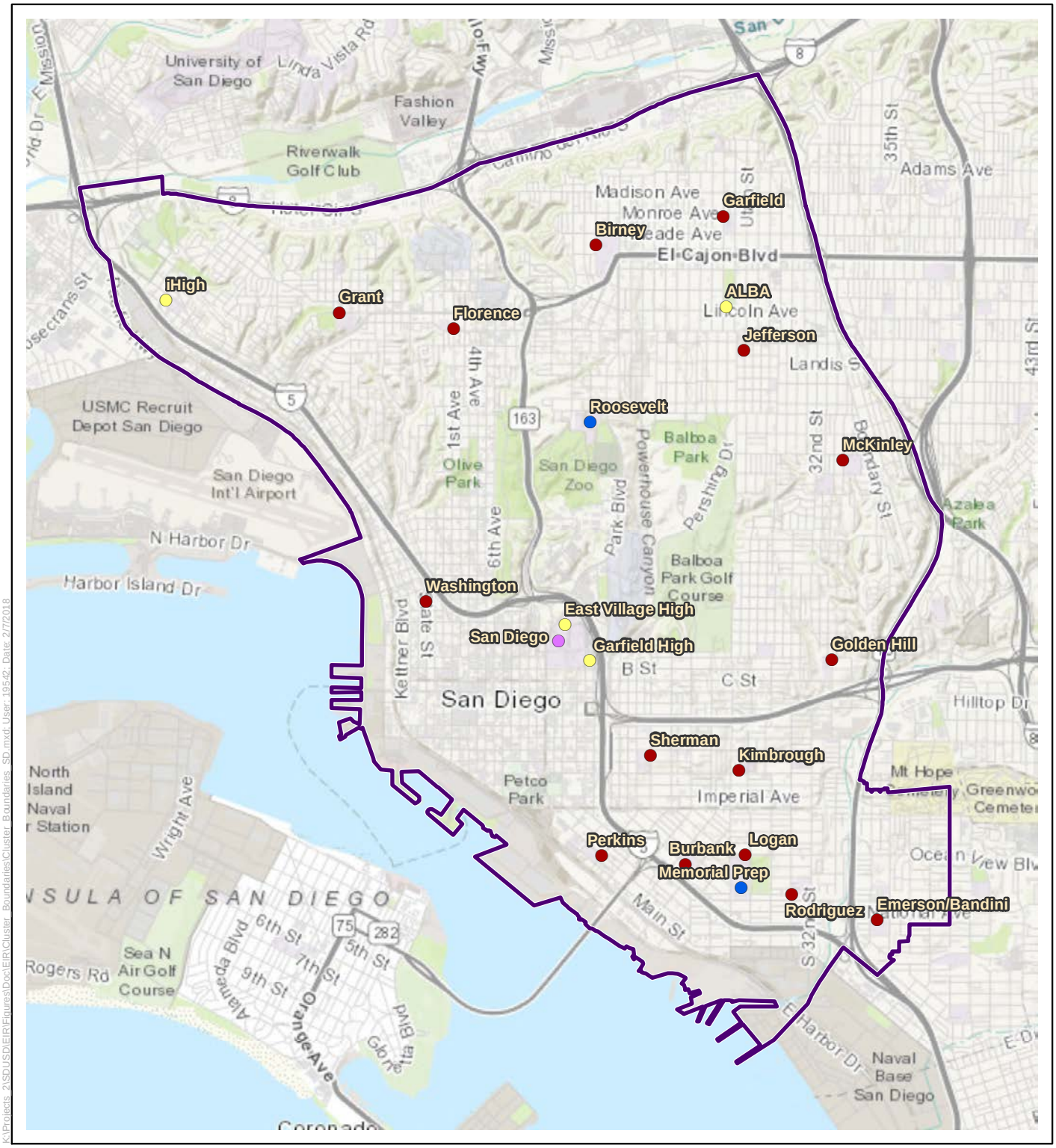
| School | Address | 2018–2019 Enrollment | Site Acreage[3] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Charter Schools** | | | | | |
| Albert Einstein Academy ES | 3035 Ash St | 800 | 2.4 | 37 | 1959–1977 |
| Albert Einstein Academy MS* | 458 26th St | 599 | -- | -- | -- |
| E3 Civic High* | 395 11th Ave | 377 | -- | -- | -- |
| King–Chavez Arts, Athletics and Primary 3–5 | 415 31st St | 719 | 7.2 | 38 | 1946–2002 |
| King-Chavez Academy of Excellence | 2716 Marcy Ave | 291 | 1.6 | 11 | 1964 |
| King-Chavez Community HS* | 201 A St | 362 | -- | -- | -- |
| King-Chavez Preparatory Academy* | 500 30th St | 368 | -- | -- | -- |
| Kipp Adelante Prep Academy* | 1475 6th Ave | 327 | -- | -- | -- |
| McGill School of Success* | 3025 Fir St | 162 | -- | -- | -- |
| Museum School* | 211 Maple St | 239 | -- | -- | -- |
| Old Town Academy[2,*] | 2120 San Diego Ave | 250 | -- | -- | -- |
| Urban Discovery Academy* | 840 14th St | 576 | -- | -- | -- |

[1] Located within a portion of City College. Building B is approximately 5,260 square feet.

[2] School located within the Dana/Correia-Roosevelt and Point Loma-San Diego Optional Area, and therefore is included in both cluster lists.

[3] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.* School not located on District property but the school's charter was authorized by the District.

** School site has an existing, active joint-use agreement with the City.




Cluster Boundaries

**School Type**

- Atypical School
- Elementary School
- High School
- Middle School




Source: Imagery-ESRI Street Map (2018)

0 0.5 1 Miles

**Figure 2-14**
**Schools within San Diego Cluster**

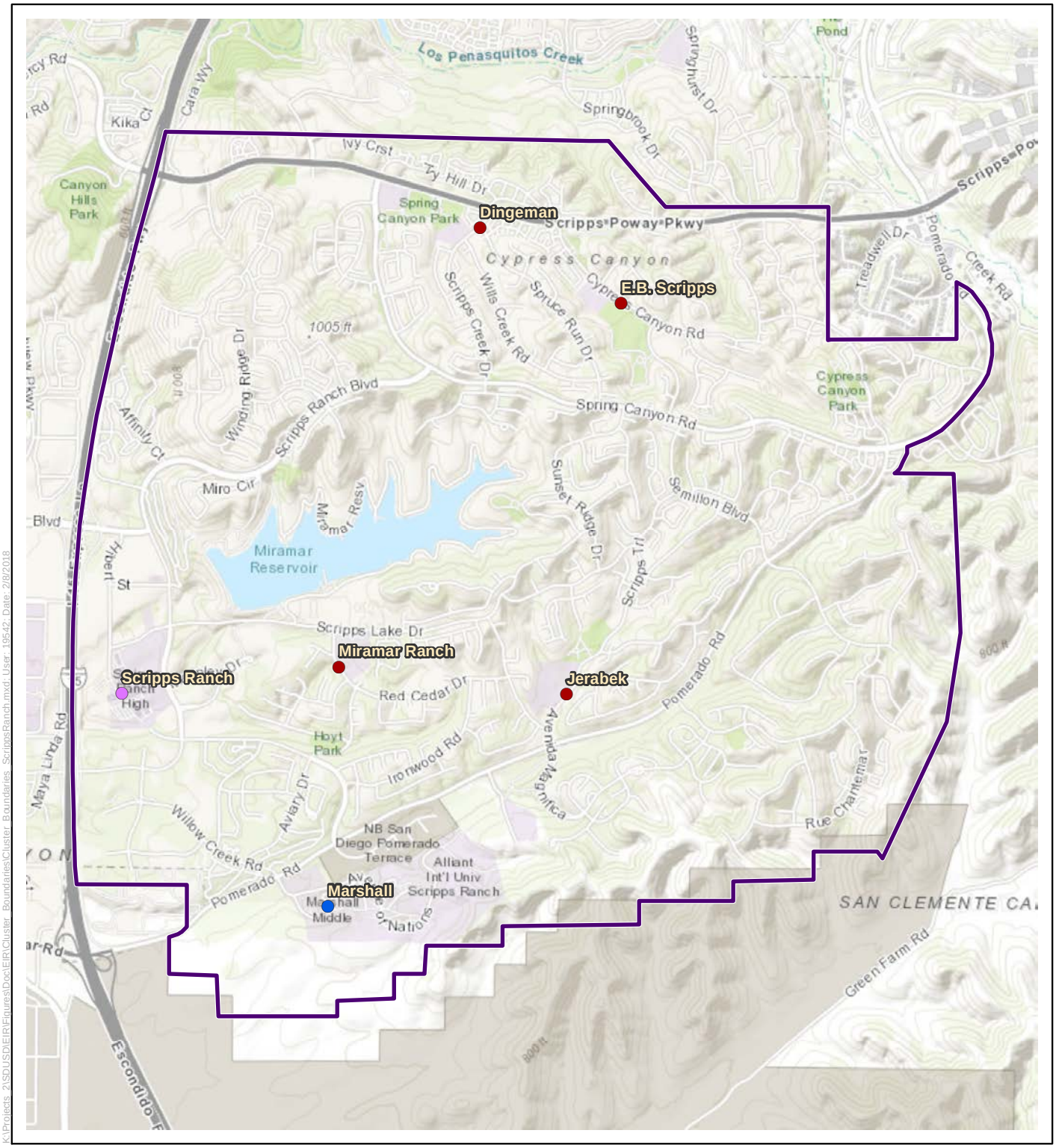
### 2.2.2.14 Scripps Ranch High School Cluster

The Scripps Ranch High School Cluster is within the Miramar Ranch North Community to the north and the Scripps Miramar Ranch Community to the south. Both community planning areas are in the north-central portion of the City of San Diego. The cluster is within an urbanized area characterized predominantly by single- and multi-family residences. Other surrounding land uses in the Miramar Ranch North Community include industrial, open space, and commercial along the Scripps Poway Parkway corridor. Land uses in the Scripps Miramar Ranch Community primarily consist of residential and open space, as well as some commercial and industrial uses. Table 2-14 details and Figure 2-15 depicts the schools physically located within the Scripps Ranch High School Cluster.

**Table 2-14. Scripps Ranch High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[1] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Dingeman ES | 11840 Scripps Creek Dr | 769 | 4.1 | 41 | 1994 |
| E.B. Scripps ES* | 11778 Cypress Canyon Rd | 736 | 5.9 | 42 | 1996–2008 |
| Jerabek ES* | 10050 Avenida Magnifica | 657 | 11.0 | 40 | 1977 |
| Miramar Ranch ES | 10770 Red Cedar Dr | 705 | 11.2 | 39 | 1976 |
| **Middle Schools** | | | | | |
| Marshall MS* | 9700 Avenue of the Nations | 1,491 | 26.0 | 60 | 2007 |
| **High Schools** | | | | | |
| Scripps Ranch HS | 10410 Falcon Way | 2,180 | 69.3 | 102 | 1993–2011 |
| **Atypical Schools** | | | | | |
| None | -- | -- | -- | -- | -- |
| **Charter Schools** | | | | | |
| Innovations Academy K–8 | 10380 Spring Canyon Rd | 404 | 6.7 | 24 | 2001 |

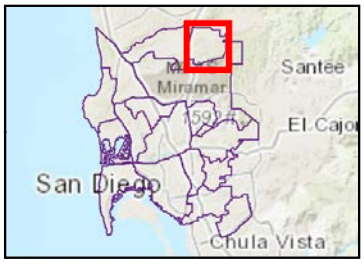
[1] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.
* School site has an existing, active joint-use agreement with the City.




Cluster Boundaries

**School Type**

- Elementary School
- High School
- Middle School




Source: Imagery-ESRI Street Map (2018)

0 0.25 0.5 Miles

N

**Figure 2-15**
**Schools within Scripps Ranch Cluster**

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### 2.2.2.15 Serra High School Cluster Council

The Serra High School Cluster is within the Tierrasanta Community in the eastern portion of the City of San Diego. The cluster is within an urbanized area characterized predominantly by single- and multi-family residences. Several commercial centers are scattered throughout the community and light industrial land uses are located near the intersection of Interstate (I-) 15 and State Route (SR-) 52. Open space canyons enhance the community and lead to expansive regional parkland areas within the community planning area. Mission Trails Regional Park is, located in the eastern portion of the Tierrasanta Community. Table 2-15 details and Figure 2-16 depicts the schools physically located within the Serra High School Cluster.

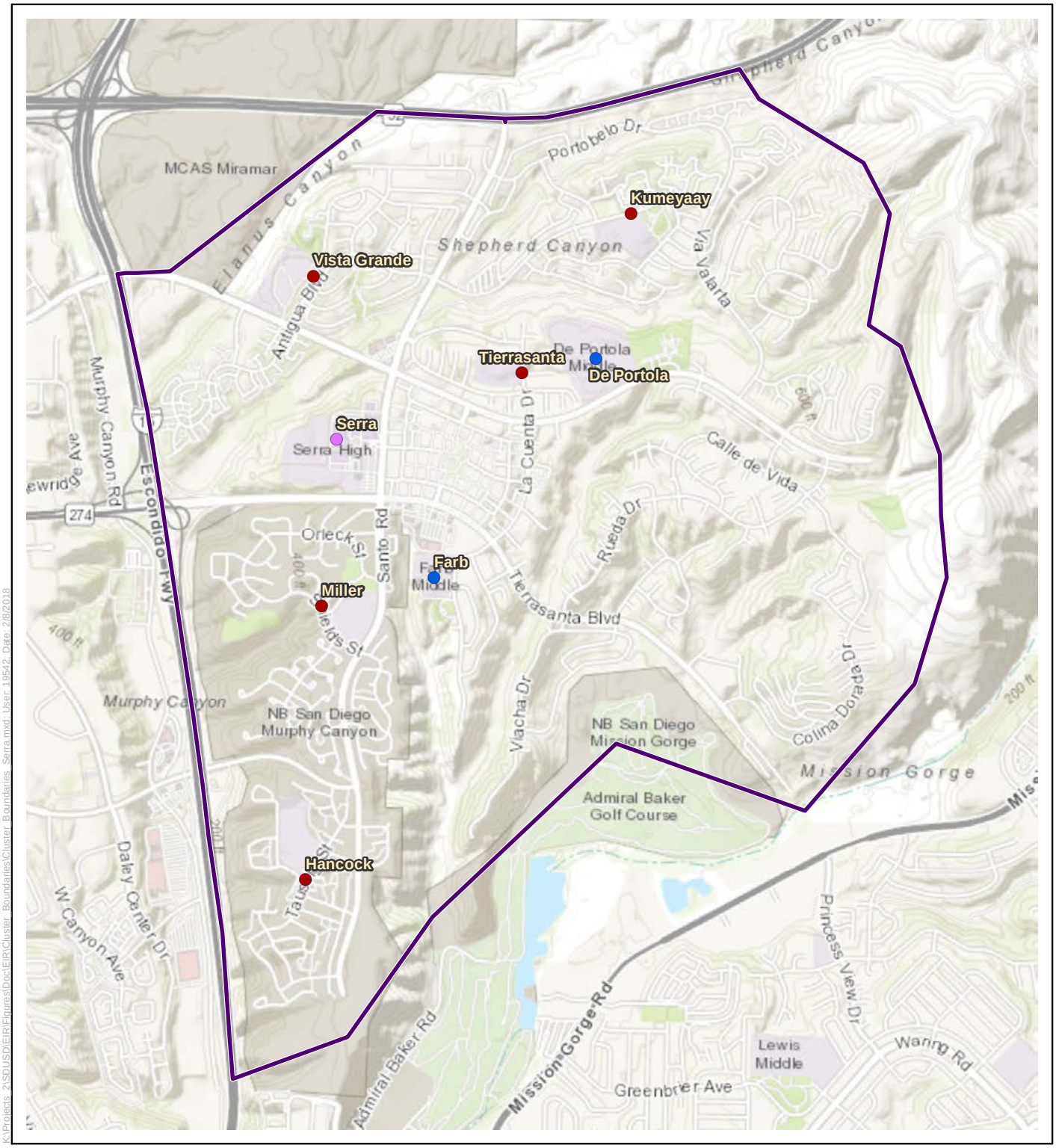
**Table 2-15. Serra High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[2] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Hancock ES | 3303 Taussig St | 609 | 18.5 | 31 | 1977 |
| Kumeyaay ES* | 6475 Antigua Blvd | 464 | 11.7 | 28 | 1992 |
| Miller ES | 4343 Shields St | 756 | 16.9 | 32 | 1975 |
| Tierrasanta ES* | 5450 La Cuenta Dr | 515 | 10.0 | 28 | 1973–1976 |
| Vista Grande ES* | 5606 Antigua Blvd | 384 | 9.4 | 26 | 1977–2005 |
| **Middle Schools** | | | | | |
| De Portola MS* | 11010 Clairemont Mesa Blvd | 905 | 32.0 | 40 | 1986–1998 |
| Farb MS | 4880 La Cuenta Dr | 476 | 13.0 | 38 | 1979–2002 |
| **High Schools** | | | | | |
| Serra HS* | 5156 Santo Rd | 1,474 | 44.7 | 89 | 1977–2012 |
| **Atypical Schools** | | | | | |
| None | -- | -- | -- | -- | -- |
| **Charter Schools** | | | | | |
| Elevate ES[1] | 5606 Antigua Blvd | 24 | -- | 5 | -- |

[1] Shares a campus with Vista Grande Elementary.

[2] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School site has an existing, active joint-use agreement with the City.




Cluster Boundaries

**School Type**

- Elementary School
- High School
- Middle School




Source: Imagery-ESRI Street Map (2018)

0 0.25 0.5 Miles

N

**Figure 2-16**
**Schools within Serra Cluster**

### 2.2.2.16 University City High School Cluster

The University City High School Cluster is within the University and Torrey Pines communities in the northwestern portion of the City of San Diego. The cluster is within an urbanized area characterized predominantly by single- and multi-family residential. Other surrounding land uses include commercial, industrial, and park and open space. Parkland resources—as identified in the University City and Torrey Pines Community Plans—include Torrey Pines, Rose Canyon, and San Clemente Canyon. Table 2-16 details and Figure 2-17 depicts the schools physically located within the University City High School Cluster.

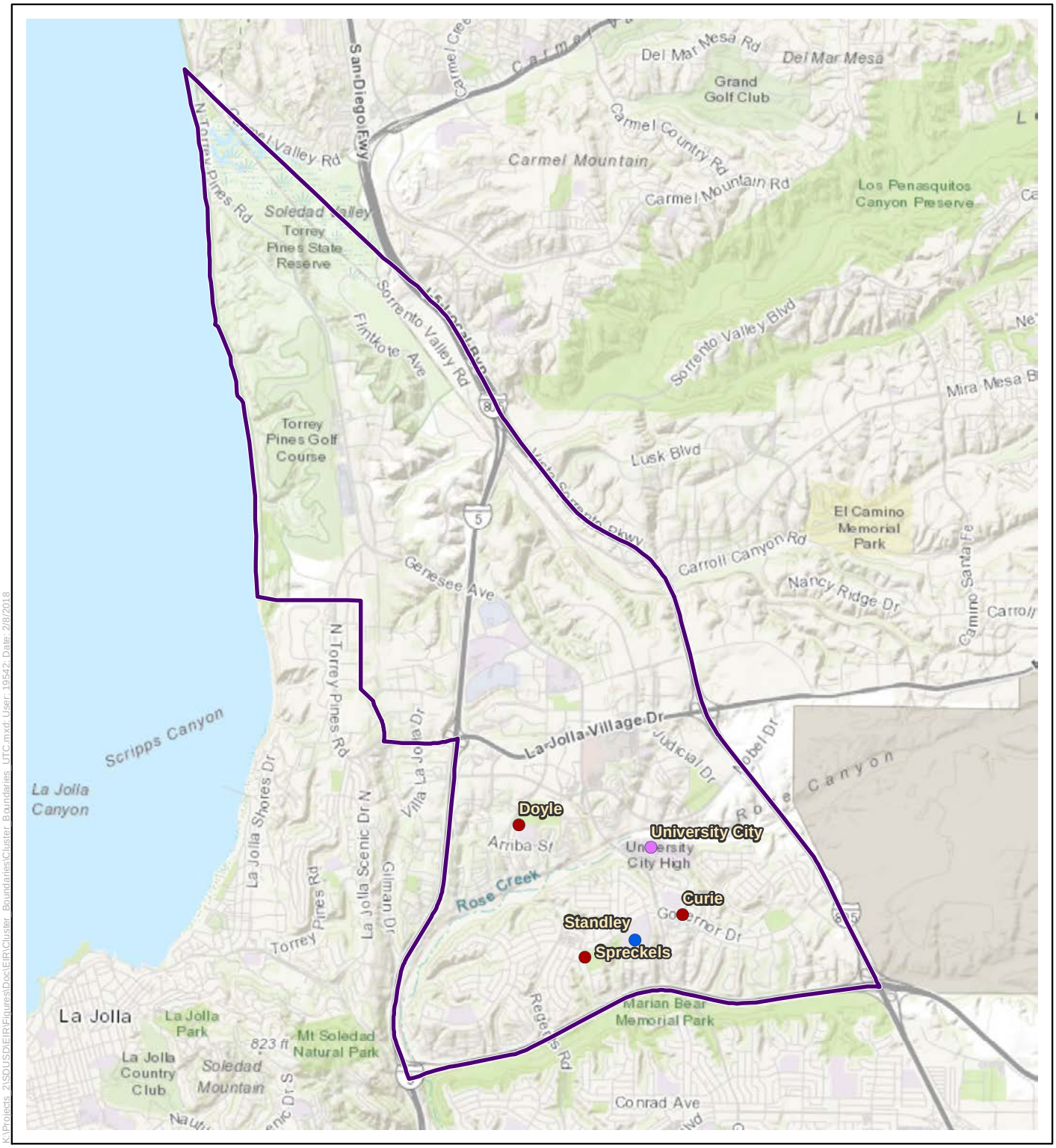
**Table 2-16. University City High School Cluster Details**

| School | Address | 2018–2019 Enrollment | Site Acreage[1] | Number of Existing Classrooms | Age of Buildings on Campus |
|---|---|---|---|---|---|
| **Elementary Schools** | | | | | |
| Curie ES | 4080 Governor Dr | 584 | 10.4 | 30 | 1965–2004 |
| Doyle ES** | 3950 Berino Court | 673 | 9.7 | 37 | 1977 |
| Spreckels ES** | 6033 Stadium St | 656 | 8.8 | 35 | 1978 |
| **Middle Schools** | | | | | |
| Standley MS** | 6298 Radcliffe Dr | 1,013 | 24.4 | 46 | 1976 |
| **High Schools** | | | | | |
| University City HS | 6949 Genesee Ave | 1,845 | 43 | 79 | 1981–1994 |
| **Atypical/Alternative Schools** | | | | | |
| None | -- | -- | -- | -- | -- |
| **Charter Schools** | | | | | |
| Preuss Charter* | 9500 Gilman Dr | 837 | 0.25 | 1 | 2017 |

[1] Site Acreage = net usable acreage at each school site and is only available for schools located on District-owned properties.

* School not located on District property but the school's charter was authorized by the District.

** School site has an existing, active joint-use agreement with the City.




Cluster Boundaries

**School Type**

- Elementary School
- High School
- Middle School

Source: Imagery-ESRI Street Map (2018)

0 0.5 1 Miles

**Figure 2-17**
**Schools within University City Cluster**

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## 2.2.3 Existing Joint-Use Facilities

All school facilities are available for third-party rentals and community use under the Civic Center Act, which permits organizations, clubs, and associations formed for recreational, educational, political, economic, artistic, and moral purposes to use school buildings and grounds. In addition to Civic Center Act use, several school sites are subject to existing joint-use agreements for use of the school's athletic facilities. The District is currently collaborating with the City of San Diego to expand recreational opportunities through the City's Play All Day program, which aims to build over 45 new joint-use parks on existing school sites. The initiative is intended to maximize shared use of public facilities and resources for educational and community use. New park facilities constructed under the Play All Day program would be developed with both City of San Diego and Proposition S and Z bond funds. A full list of existing District joint-use facilities is provided in Appendix C of this PEIR.

## 2.2.4 Excess Property and Unused District Sites

The District maintains an inventory of all excess property and unused District sites, which are deemed to be any sites owned by the District that are not being used for District school purposes or operations. However, these sites may be leased to other entities for school uses, such as private schools or charter schools that are not authorized charters by the District. There are currently no plans to develop any of the currently undeveloped District-owned parcels. All developed leased sites are under long-term leases of 5 years or greater. However, the District may periodically provide maintenance of District assets at these sites.[4] Table 2-17 identifies name, location, and existing use of the District's various unused sites.

**Table 2-17. Unused District Sites**

| Site Name | Address | Existing Use |
|---|---|---|
| Amici Park | West Date Street between Union St and Date St (92101) | Joint Use Park with City of San Diego; license agreement with Little Italy Association for use of portion of Amici Park (0.69 acre) |
| Bay Terraces #6 | Goode St & Tooma St (92139) | Undeveloped Parcel (24.05 acres gross) |
| Benchley Elementary Site (former) | 7202 Princess View Dr (92120) | Leased to Excelsior Academy (4.28 acres) |
| Camp Elliot 2 | Northeast of the intersection of Santo Road and SR-52 in Tierrasanta (92124) | Undeveloped Parcel (58.5 acres) |
| Camp Elliot 3 | Adjacent to Mission Trails Regional Park, north of Calle de Vida at the intersection of Colina Dorada in Tierrasanta (92124) | Undeveloped Parcel with utility easements (11.73 acres) |
| Commercial Street | 1826 Irving Ave (92113) | Leased Site: COMM 22, LLC (3.45 acres) |
| Decatur Elementary | 6550 Soledad Mountain Rd (92037) | Leased Site: French American School (8.92 Acres) |

[4] Maintenance of these sites is based on the specifications of the individual leases and are not part of the Proposed Program. CEQA analyses are conducted at the time new or updated leases are prepared.

| Site Name | Address | Existing Use |
|---|---|---|
| Education Center | 4100 Normal St (92103) | Existing District support facility. Birney Elementary School is also included in the acreage (17.89 acres). |
| Forward Elementary Site | 6460 Boulder Lake Ave (92119) | Leased Site: Springall Academy (11.12 acres) |
| Grantville Elementary | 6145 Decena Dr (92120) | Leased Site: Vista Hill Foundation (Stein Education Center) (7.08 acres). |
| Instructional Media Center (IMC) and Supply Center | 2441 and 2351 Cardinal Lane (92123) | Existing District support facility (23.21 acres) |
| Marcy Avenue | 2716 Marcy Ave (92113) | Leased Site: King Chavez (1.65 acres). |
| Marcy Elementary Site (former) | 2640 Soderblom Ave (92122) | Leased Site: Mission Bay Montessori School (14.60 acres) |
| Revere Center | 6735 Gifford Way (92111) | Existing District support facility (7.78 acres) |
| Rolando Park Elementary (unimproved portion at operating school site not required for education program) | 6620 Marlowe Dr (92115) | Remnant Land (26.32 acres) |
| River Bank Plaza | 3420 and 3430 Camino Del Rio North (92108) | Leased Site: Audeo Charter School |
| Scripps Elementary | 2225 Torrey Pines Rd (92037) | Leased Site: The Children's School (5.99 acres). |
| Scripps Ranch High (portion of site that will not be occupied by high school campus improvements) | 10410 Treena St (92131) | Remnant Land; school parking upper, temporary encroachment permit(s) income lower (65.48 acres) |
| Serra Elementary Site | Fontaine St and Margerum Ave (92120) | Undeveloped Parcel (landlocked 0.18 acre) |
| Vista Grande Elementary (unimproved portion at operating school site not required for education program) | 5606 Antigua Blvd (92124) | Remnant Land (2.17 acres) |

Chapter 3
# Project Description

## 3.1 Introduction

The Proposed Program involves the establishment and implementation of the District's Capital Improvement Program and the preparation of the *San Diego Unified School District CEQA Handbook* (CEQA Handbook). Repair, renovation, and revitalization projects associated with the Proposed Program would include a wide range of future construction and operational activities on either existing school sites or administration facilities or on new, currently unidentified sites.

## 3.2 Project Background and Purpose

### 3.2.1 San Diego Unified School District

The District encompasses approximately 208 square miles primarily within the City of San Diego[1] and is the second largest school district in California, serving more than 121,000 students in preschool through 12th grade (District 2019). The student population is extremely diverse, representing more than 15 ethnic groups and more than 60 languages and dialects. The District is composed of 223 total educational facilities,[2] 10 administrative sites, and three vacant parcels of land, and employs 12,893 total employees. Since its founding on July 1, 1854, the District has grown from a small, rented school building with one teacher to its current size. As of the 2018–2019 school year the District's various educational facilities include 107 elementary schools, 7 K–8 schools, 24 middle schools, 23 high schools,[3] 45 charter schools, and 17 atypical/alternative schools (Hudson pers. comm.).

The mission of the District is as follows.

> All San Diego students will graduate with the skills, motivation, curiosity, and resilience to succeed in their choice of college and career in order to lead and participate in the society of tomorrow. (District n.d.)

Fulfillment of this mission is currently charted through the District's Vision 2020 plan. This plan is a focused, long-term roadmap for student success, culminating in the graduation of the Class of 2020. The overarching goal of the plan is to ensure a quality educational experience for present and future students, and several of its supporting goals emphasize the value of safe and modern school

[1] As discussed further in Chapter 2, *Environmental Setting*, the District's jurisdiction also includes small portions of the cities of La Mesa and Lemon Grove, as well unincorporated San Diego County. However, all existing District facilities are within the boundaries of the City of San Diego.

[2] The total educational facilities include 45 charter schools as of the 2018–2019 academic year. While the District acts as the authorizing agency for charter schools, they operate independently from the District. Additionally, not every charter school is located on District property, but every charter school accounted for in this total has been authorized a charter by the District.

[3] Total includes the different schools that comprise the Kearny High School Complex and San Diego High School Complex. Each of the individual schools that make up each these complexes have the same addresses as the complex in which they are located (i.e., they are located on the same campus).

facilities in student growth and achievement. Vision 2020 sees San Diego's schools as true neighborhood learning centers where student learning extends beyond the school site and includes multiple benefits to the surrounding neighborhoods.

#### 3.2.1.1 Vision 2020

To prepare its students for the competitive global economy, the District Board of Education developed a focused, long-term plan for student achievement. Vision 2020 is a community-based school reform plan that engages all parents, staff, students, and community members. Between now and 2020, the District intends to develop a world-class school system for all their students. The Board of Education holds itself responsible for maintaining the focus of the staff and the community on Vision 2020, and reviews the plan at the end of each school year to assess progress toward the goals of the vision. The Board designates to the Superintendent the development of the strategic process for implementing the goals of Vision 2020.

The goal of Vision 2020 is to create a school district that provides improved and broader measures of student achievement, develops schools as neighborhood learning centers; ensures effective teaching in the classroom, engages parents and community volunteers in the educational process, and facilitates communication and support. Under the Vision 2020 plan, the District Board of Education aims to develop a quality school in every neighborhood. There are 12 indicators of a quality neighborhood school, which include providing:

- Access to a broad and challenging curriculum
- Quality teaching
- Quality leadership
- Professional learning for all staff
- Closing the achievement gap with high expectations for all
- Parent/community engagement around student achievement
- Quality support staff integrated and focused on student achievement
- Supportive environment that values diversity in the service of students
- High enrollment of neighborhood students
- Digital literacy
- Neighborhood center with services depending on neighborhood needs
- Safe and well-maintained facilities

The District adopted the current Educational Specifications in 2014 to support its mission and Vision 2020. In addition, the District has an existing Long-Range Facilities Master Plan (Facilities Master Plan) as well as Propositions S and Z, and Measure YY, all of which define the District's existing facility planning and improvement process.

### 3.2.2 Existing Facility Planning and Improvement Process

The District has a responsibility to provide quality neighborhood schools for its students consistent with the goals of Vision 2020. Currently, the District conducts separate CEQA analyses for every

proposed capital improvement project at each school. These projects include improvements currently identified in the Facilities Master Plan, Propositions S and Z, and Measure YY and are consistent with the District's Educational Specifications, each of which is described below. These documents form the basis for the District's current facility planning and improvement process and define the types of improvements implemented at each school site.

### 3.2.2.1 District Educational Specifications

The District's Facilities Planning and Construction (FPC) Division maintains an ongoing effort to respond to facility needs throughout the District. With this comes an opportunity to address the needs of educational programs and implement innovative planning approaches that can respond to the present, as well as future, instructional needs of the District and its students.

To support these strategies, the District works to efficiently utilize various funding resources as they become available. These include local General Obligation Bonds authorized by the community's passage of various propositions over the years, applications to the Office of Public School Construction (OPSC) for facility funding when the District meets the relevant eligibility criteria, and various specialized funding sources based on specific design criteria such as California High Performance Schools (CHPS) funding for energy efficiency.

Despite these opportunities, it is also recognized that the need for facility improvements at District schools far outweighs available funding. The District will continue to pursue all other available sources of State and federal funding to support the broadest long-term implementation of the constantly evolving Facilities Master Plan. These factors reinforce the reality that all available resources must be utilized as efficiently as possible through a well-crafted and focused long-term plan.

From a planning perspective, the District faces both challenges and opportunities within its facilities improvement program. District instructional practices are rapidly evolving and present the need for creative approaches to project planning. It is the expectation of District Instructional Leadership that every effort will be made to transform learning spaces in all District classrooms from teacher-centered environments to student-centered environments. These concepts have profound facility planning implications for all current and future District facility projects.

### 3.2.2.2 Long-Range Facilities Master Plan

A Facilities Master Plan, once adopted or approved, can serve as the basis for the development of a Capital Improvement Program, which could span one or several bond programs and include a variety of other funding sources. In 2008, the District updated its Facilities Master Plan, which identifies and prioritizes District-wide needs for renovation and expansion of existing facilities and for new school construction. The Facilities Master Plan update was based on a comprehensive assessment of needs and extensive outreach among District stakeholders to share findings from the assessment; discuss costs, funding sources, and priorities; and seek input.

The majority of the District's 200 plus sites were built 20 to 50 years ago, and half of its buildings are more than 45 years old. The Facilities Master Plan update concluded that significant facility improvements were necessary to meet current educational needs; support 21st century teaching and learning; and ensure a safe, secure, and healthy environment for students and staff.

### 3.2.2.3 Propositions S and Z, and Measure YY

The District's existing facility planning and improvement process is also defined by three existing bond measures: Propositions S and Z, and Measure YY. The bond measures provide a list of specific project improvements that could be implemented at any of the District's school sites. The following describes each bond measure as well as the specific improvements that were authorized under them.

#### Proposition S Improvements

On November 4, 2008, nearly 69% of San Diego voters passed the $2.1 billion general obligation bond measure, Proposition S, also referred to as the "School Repair and Safety Measure of 2008" in the official bond measure language. Proposition S includes a list of specific projects to repair, renovate, and revitalize neighborhood schools. Proposition S extends the previous voter-approved Proposition MM from 2029 to 2044. Proposition S funds must be used for the projects listed in the bond language placed before the voters, and it cannot be used for teacher or administrative salaries. Proposition S identifies specific projects that are authorized to be completed at each individual school site. The list of school-specific improvements can be found in the Proposition S Bond Measure (District 2021).[4] In addition, the District may also allocate site discretionary funds to each elementary, middle, and high school, including charter schools, for qualified permitted projects on the District's property. Moreover, Proposition S authorizes the following projects to be completed at each or any of the District's sites, including child development centers and other District facilities (or, in the case of an allocation of site discretionary funds, including at any charter school site).

**School Improvements to Support Student Health, Safety, and Security**

- Replace obsolete fire alarms, including emergency communications systems.
- Improve safety of student drop-off and pick-up areas, parking, and pedestrian and vehicular circulation.
- Provide school site security improvements, including increased lighting, and vandalism and intrusion safeguards.
- Meet increased earthquake and seismic standards in pre-1976 school buildings.
- Remove and abate asbestos, mold, or other potentially dangerous substances.
- Upgrade and install classroom ventilation or air conditioning.
- Improve and install student and neighborhood use play fields with joint-use funding.

**Projects to Improve School Accessibility; Code Compliance Upgrades**

- Modernize and renovate or expand student restrooms.
- Upgrade and expand student food service areas and kitchens to meet increased standards.
- Modernize and renovate physical education facilities, playgrounds, and fields for accessibility and safety.
- Repair and replace ageing and obsolete portable classrooms.

[4] The full text of the Proposition S Bond Measure can be accessed on the District's website: https://www.sandiegounified.org/about/bond_programs/propositions_s_z.

- Improve accessibility for disabled persons and comply with the Americans with Disabilities Act (ADA) and Title 24.

### Major Building Systems Repair and Replacement

- Complete major repair and renovation projects as indicated:
    - Repair and replace deteriorating plumbing and underground sewer systems.
    - Repair and replace aging, leaky roofs.
    - Repair and replace outdated, inefficient heating, ventilation, and air cooling systems.
    - Upgrade electrical capacity and repair aging wiring to support instructional technology.
    - Repair and restore classroom and building interior and exterior finishes and fixtures.
- Repair and replace inadequate temporary classrooms, school buildings, or sites with cost-effective permanent construction.

### Accommodating Student Enrollment

- Provide matching funds to plan and construct classrooms and schools as needed for enrollment growth.

### Charter School Facilities

- Consistent with the District's obligation under Proposition 39 (approved by California voters in November 2000) and Section 47614 of the Education Code, provide classroom capacity, including furnishings and equipment, for in-district charter school students at a level comparable to students attending District-run schools.

## Proposition Z Improvements

On November 6, 2012, approximately 62% of San Diego voters approved Proposition Z, a $2.8 billion bond proposition. Proposition Z, also referred to as the "San Diego Neighborhood Schools Classroom Safety and Repair Measure of 2012," enables the District to maintain safe and productive learning environments for students during the State's ongoing budget crisis. Similar to Proposition S, Proposition Z funds must be used for the projects listed in the bond language placed before the voters, and it cannot be used for teacher or administrative salaries. Proposition Z identifies specific projects that are authorized to be completed at each individual school site. The list of school-specific improvements can be found in the Proposition Z Bond Measure (District 2021).[5] In addition to school-specific projects, Proposition Z authorizes the following projects to be completed at each or any of the District's school sites.

### Building Systems Repair and Replacement

- Complete major electrical, infrastructure, plumbing, sewage, structural, heating, ventilation and air conditioning (HVAC), and landscaping repair, upgrades, and renovations to school sites including but not limited to:
    - Replace or upgrade outdated electrical systems, aging wiring, and electrical panels.

[5] The full text of the Proposition S Bond Measure can be accessed on the District's website: https://www.sandiegounified.org/about/bond_programs/propositions_s_z.

- Repair or replace deteriorating plumbing and underground sewer systems.
- Repair or replace aging, leaky roofs.
- Repair or replace outdated, inefficient heating, ventilation, and air cooling system to save energy and reduce maintenance costs.
- Repair or restore classroom and building interior and exterior finishes and fixtures.
- Repair or replace cracked and broken concrete sidewalks, hardscape, and exterior infrastructure.
- Resurface, repair, or upgrade asphalt parking lots and playground areas.
- Repair or replace doors and windows.

**School Improvements to Support Student Learning and Instruction**

- Provide up-to-date classroom and instructional technology required for 21st century student learning and teaching.
- Upgrade and expand information systems and technology throughout the District to support 21st century classrooms, efficient operations, and student and parent services.
- Upgrade wired and wireless infrastructure and equipment to support technology systems and leverage federal and state matching funds for school technology programs.
- Upgrade classroom instructional technology and student connectivity devices.

**College, Career, and Technical Education Facility Improvements**

- Upgrade and expand classrooms, labs, and specialized facilities for career and vocational technology programs.

**School Improvements to Support Student Health, Safety, and Security**

- Replace obsolete fire alarms and outdated emergency communications systems.
- Remove, remediate, and abate asbestos, mold, and other potentially dangerous substances.
- Provide school site security improvements, including increased lighting, fencing, and vandalism and intrusion safeguards.
- Upgrade or install air conditioning for schools located in warmer areas.
- Upgrade and expand student food service areas and kitchens to improve student access to a variety of nutritious meals.
- Improve the seismic structural integrity of school buildings to better protect students and staff in the event of an earthquake.
- Reconfigure second floor exiting to improve safety of ingress and egress for students.

**Improve School Accessibility and Code Compliance Upgrades**

- Improve accessibility for disabled persons to comply with the ADA and Title 24.
- Modernize and renovate or expand restrooms to improve accessibility.

- Modernize and renovate physical education facilities, playgrounds, and fields to comply with Title IX gender equity requirements.
- Repair aging portable classrooms to comply with code requirements.

**Energy Efficiency and Sustainability**

- Install energy efficient (light-emitting diode [LED]/fluorescent) lighting systems with occupancy sensors.
- Install solar lighting systems.
- Increase building insulation and dual-pane windows.
- Replace older inefficient mechanical and central control systems with energy efficient systems.
- Purchase and install solar panels and other devices to generate electricity from sunlight where feasible.
- Install innovative systems to produce energy and/or reduce consumption.
- Install recycled water systems for irrigation and make connections to recycled water supplies for irrigation purposes where feasible.
- Install water-saving efficient toilets and fixtures.

**Quality Neighborhood Schools**

- Plan, acquire property for, and construct new classrooms and school facilities to accommodate student enrollment in neighborhood schools, including to accommodate growth in the following high school cluster areas: Clairemont High School Cluster, Crawford High School Cluster, Henry High School Cluster, Hoover High School Cluster, Kearny High School Cluster, La Jolla High School Cluster, Lincoln High School Cluster, Madison High School Cluster, Mira Mesa High School Cluster, Mission Bay High School Cluster, Morse High School Cluster, Point Loma High School Cluster, San Diego High School Cluster, Scripps Ranch High School Cluster, Serra High School Cluster, and University City High School Cluster.
- Renovate existing inadequate classrooms and support facilities.
- Improve or construct school buildings, facilities, parking lots, and structures to meet the needs at neighborhood schools.
- Provide, expand, or improve facilities to meet the needs of special education students.
- Improve and install playfields for student and neighborhood joint-use with the City of San Diego.
- Develop or improve education, recreation, and/or community resource facilities for joint-use to support students and neighborhood families.
- Remove or replace old or inadequate buildings with new facilities.
- Remove excess portable classroom buildings to reduce utility and maintenance costs.
- Improve visual and performing arts facilities.
- Improve physical education, athletic facilities, and turf fields.
- Expand classroom capacity and school facilities to meet projected area growth needs.

- Expand classroom, science/technology lab capacity, and school facilities to meet projected needs.
- Expand and develop science education facilities to support students for joint-use.
- Expand or develop joint-use athletic facilities.

### Growth

- Construct school facilities to accommodate projected growth in high school cluster areas.

### School Site and Classroom Funds

- Allocate at every elementary, middle, and high school $200 per student (as "site discretionary funds") to be spent on qualified, permitted projects that shall remain property of the District.

## Measure YY Improvements

Measure YY, also referred to as the “San Diego School Repair and Student Safety Measure” was passed in November 2018 and authorized the issuance of $3.5 billion in bonds at legal rates, projecting a levy of 6 cents per $100 of assessed valuation for 39 years, resulting in estimated $193 million average annual repayments. Measure YY authorizes the following projects to be completed at each or any of the District’s school sites in addition to school-specific projects.

### School Security, Health, and Safety Improvements

- Improve school security, emergency communications systems, controlled-entry points, and door locks.
- Provide school site security improvements, including increased lighting fencing, and vandalism and intrusion safeguards.
- Upgrade plumbing for lead solder remediation.
- Improve the seismic structural integrity of school buildings to better protect students and staff in the event of an earthquake.
- Reconfigure second floor exiting to improve safety of ingress and egress for students.
- Replace obsolete fire alarms/sprinklers and update emergency communications systems.
- Remove, remediate, and abate asbestos, mold, and other potentially dangerous substances.
- Provide playground shade shelters for students.
- Upgrade and expand student food service areas and kitchens to improve student access to a variety of nutritious meals.
- Improve vehicular and pedestrian circulation safety and parking.
- Improve health and wellness centers at schools and nurses’ offices.

### Major Repair Replacement and Modernization

- Replace or upgrade outdated electrical systems, aging wiring, electrical panels, and lighting.
- Repair or replace deteriorating plumbing and underground sewer systems.
- Repair deteriorated interior and exterior finishes and fixtures.

- Repair or replace worn or damaged doors and windows.
- Repair or replace roof systems.
- Repair or replace outdated, inefficient HVAC systems to save energy and reduce maintenance costs.
- Repair or replace cracked and broken concrete sidewalks, hardscape, and exterior infrastructure.
- Repair building foundations and slabs.
- Resurface, repair, or upgrade asphalt parking lots and playground areas.
- Replace or upgrade auditorium sound, intercom systems, and public address systems.
- Repair or replace playground equipment.
- Replace or resurface track and turf surfaces as needed.
- Repair or restore classroom and building interior and exterior finishes and fixtures.
- Repair or replace damaged or broken hardscape surfaces and exterior infrastructure.
- Complete major electrical, infrastructure, plumbing, sewage, structural systems, HVAC, and landscaping renovation and upgrades to school sites.
- Repair and replace other facilities as needed, including constructing new buildings to replace current facilities, coordinating work with other capital projects.

**Improvements to Support Innovations in Education and Access to Technology**

- Provide up-to-date classroom and instructional technology required for 21st century student learning and teaching.
- Upgrade wired and wireless infrastructure and equipment to support technology systems with potential federal and state matching funds for school technology programs.
- Provide or upgrade school facilities to support education pathways including science, technology, engineering, and mathematics (STEM) labs; maker spaces; dual language emersion; and visual and performing arts.
- Upgrade, furnish, equip, acquire, and/or install up-to-date classroom and instructional technology in classrooms and related school facilities.
- Upgrade and expand enterprise information systems and technology throughout the District to support 21st century classrooms, efficient operations, and student and parent services.
- Provide, expand, or improve facilities for special education students.
- Construct collaborative learning spaces, maker spaces, and labs.
- Provide or expand online education facilities and innovation centers.
- Create innovative, interactive, and collaborative outdoor learning spaces.

**College, Career, and Technical Education Facility Improvements**

- Upgrade and expand classrooms, labs, and specialized facilities for career and vocational technology programs.

- Build specialized school facilities for career technical education.
- Construct school facilities on leased property, including on property owned by other public agencies for joint-use with other public agencies.

**Improve School Accessibility and Code Compliance Upgrades**

- Improve accessibility for disabled persons to comply with the ADA and Title 24.
- Modernize, renovate, and expand restrooms to improve accessibility.
- Modernize and renovate physical education facilities playgrounds, and fields to comply with Title IX gender equity requirements.
- Repair aging portable classrooms to comply with code requirements.

**Energy Efficiency and Sustainability**

- Install energy efficient (LED/fluorescent) lighting systems with occupancy sensors.
- Install solar lighting systems.
- Increase building insulation and dual-pane windows.
- Replace older inefficient mechanical and central control systems with energy efficient systems.
- Purchase and install solar panels and other devices to generate electricity from sunlight where feasible.
- Install innovative systems to produce and store energy, and/or reduce consumption.
- Install recycled water systems for irrigation and make connections to recycled water supplies for irrigation purposes where feasible.
- Install water-saving efficient toilets and fixtures.

**Neighborhood Learning Centers**

- Plan, acquire property for, and construct new classrooms and school facilities to accommodate student enrollment in neighborhood schools, including to accommodate growth in the following high school cluster areas: Clairemont High School Cluster, Crawford High School Cluster, Henry High School Cluster, Hoover High School Cluster, Kearny High School Cluster, La Jolla High School Cluster, Lincoln High School Cluster, Madison High School Cluster, Mira Mesa High School Cluster, Mission Bay High School Cluster, Morse High School Cluster, Point Loma High School Cluster, San Diego High School Cluster, Scripps Ranch High School Cluster, Serra High School Cluster, and University City High School Cluster.
- Renovate or replace existing inadequate classrooms and support facilities.
- Improve or construct school buildings, facilities, parking lots, and structures to meet the needs at neighborhood schools.
- Provide facilities to meet the needs of special education students.
- Develop and expand visual and performing arts theaters.
- Improve and install playfields for student and neighborhood joint-use with the City of San Diego.
- Develop and build marine science blue technology focused education facilities.

- Build visual and performing arts schools and theaters/concert halls.
- Construct health science focused schools.
- Develop and build language education facilities.
- Construct recreational and swimming facilities, including for joint-use with other public agencies and public benefit non-profit entities.
- Develop or improve education, recreation, and/or community resource facilities for joint-use to support students and neighborhood families.
- Remove or replace old or inadequate buildings with new facilities.
- Remove excess portable classroom buildings to reduce utility and maintenance costs.
- Acquire property for, design, and construct new school administrative facilities and/or renovate existing school administration center facilities.
- Improve or expand visual and performing arts facilities.
- Construct or improve gymnasiums at middle and high schools.
- Improve and expand physical education, athletic facilities, and turf fields.
- Install, renovate, or replace athletic field and stadium lighting.
- Improve or expand high school stadiums.
- Expand classroom capacity and school facilities to meet projected area growth needs.
- Expand classroom, science/technology lab capacity, and school facilities to meet projected needs.
- Expand and develop science education facilities to support students for joint-use.
- Expand or develop joint-use athletic facilities.

**Growth**

- Construct school facilities to accommodate projected growth in high school cluster areas.

**School Site and Classroom Funds**

- Allocate at every elementary, middle, and high school $100 per student (as "site discretionary funds") to be spent on qualified, permitted projects that shall remain the property of the District.

### 3.2.2.4 Propositions S and Z, and Measure YY Construction Bond Project Plan

The Propositions S and Z, and Measure YY Construction Bond Project Plan addresses project milestones and provides an overview of the current bond implementation program. On November 4, 2008, November 6, 2012, and November 6, 2018, voters approved, respectively, Propositions S and Z, and Measure YY general obligation bond measures to improve every school in the San Diego Unified School District. On May 14, 2013, the Board of Education (Board) approved the Proposition Z Two-Year Project Plan for implementing projects identified in the Bond Project List and included estimated project schedules. On December 1, 2013, the Board approved an update to the Proposition Z Two-Year Project Plan, which also incorporated Proposition S projects and schedules.

On June 3, 2014, the Propositions S and Z Project Plan expanded beyond its 2-year time horizon and has come to be known as the multiple-year project plan. The multiple-year project plan has subsequently been updated at each staff presentation to the Board, most recently on December 3, 2019. In response to Board priorities and direction, staff is presenting its latest update to the multiple-year project plan for Board approval which includes references to the voter guides for Proposition S, Proposition Z, and Measure YY projects.

# 3.3 Project Objectives

CEQA requires that an EIR contain a "statement of the objectives sought by the proposed project." Under CEQA, a "clearly written statement of objectives will help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision-makers in preparing findings or a statement of overriding considerations. The statement of objectives should include the underlying fundamental purpose of the project" (State CEQA Guidelines Section 15124(b)). The project objectives are based on a planning horizon through 2057, the year through which the proposed November 6, 2018, general obligation bond measure is expected to be funded. The District has identified the following objectives for the proposed project:

1. Meet the Board of Education Vision 2020 plan to develop a quality school in every neighborhood by facilitating approval of the following at specific school sites:
    - Improving school security, emergency communications, controlled-entry points, and door locks so that students and staff have the right to a safe and secure campus where they are free from physical and psychological harm.
    - Upgrading classrooms/labs for vocational/career, science, technology, and math education to provide for a unique opportunity for in-depth studies in a specific area of interest.
    - Repairing foundations, bathrooms, and plumbing to provide healthful, safe, and adequate facilities that enhance the instructional program.
    - Removing lead in drinking water and hazardous asbestos to provide a safe and healthy environment at school facilities for students, staff, and community members.
    - Acquiring property for neighborhood and charter schools to best serve the District's educational needs in accordance with the District's Long-Range Facilities Master Plan and State law, to provide diverse learning opportunities for District students, and to accommodate and contribute to other community needs.
2. Allow for the continued implementation of repairs, renovations, and/or upgrades of specific school sites and facilities consistent with requirements specified in current and future funding mechanisms and to ensure that the adequacy, design, and conditions of existing District facilities meet the needs of the instructional program and to maintain clean and inviting schools that are worthy of our students and families.
3. Facilitate agreements with any public agency, public institution, and/or community organization for use of community facilities for school programs or to make school facilities or grounds available for use by those entities and allow for community and school use of District athletic fields and lighted stadiums in a way that maximizes benefits to the school and its students while minimizing negative impacts on the surrounding community.

4. Develop District-specific CEQA guidelines and criteria, and standard construction and operating procedures to allow for a consistent streamlined process for future environmental reviews of specific school capital improvement and maintenance projects in order to maximize efficiency and provide updated facilities for students as quickly as possible.
5. Improve and modernize District facilities to retain and encourage students to return to their neighborhood schools.

# 3.4 Program Description

The Proposed Program includes two components: the establishment and implementation of the Capital Improvement Program to repair, renovate, and revitalize District schools and the preparation of the *San Diego Unified School District CEQA Handbook*. The District currently conducts separate CEQA analyses for every proposed capital improvement(s) project at each school. The capital improvement component of the Proposed Program is further described in Sections 3.4.1 and 3.4.2, and the CEQA Handbook document is described in Section 3.4.3.

## 3.4.1 Capital Improvement Program Project Categories

The Proposed Program consists of improvements identified in the 2008 Long-Range Facilities Master Plan, Propositions S and Z, and Measure YY, as well as other potential projects not identified within existing documents or specific bond measures that are described in this PEIR. For the purposes of this PEIR, the Proposed Program consists of four project categories that represent typical capital improvement projects that could be implemented at any of the District's schools and administrative sites, as well as new, currently unidentified sites. These four categories are based on project scope and type of construction. This PEIR evaluates the potential physical environmental impacts associated with each of these project categories. As such, the environmental analysis for each issue area in this document considers the following typical project categories:

1. New Acquisition and New School or Administrative Facilities
2. Whole Site Modernization
3. Upgrades of Existing School and Administrative Sites
4. Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

A detailed description of each of these project categories and the types of improvements that could be included under them is provided below. Unless noted otherwise, all District projects are required to be designed in compliance with applicable federal, state, and local regulations and standards, including, but not limited to, the ADA, Title IX of the federal Education Amendments of 1972, Title 5 of the California Code of Regulations, Title 24 of the California Building Standards Code, and Collaborative for High Performance Schools (CHPS) standards. In addition, as specified in Propositions S and Z, and Measure YY, the Proposed Program (all project categories) stipulates measures aimed at energy efficiency and sustainability. This is manifested through increased incorporation of green-building principles, including an emphasis on energy efficiency, water conservation, and waste reduction.

Table 3-1 summarizes the improvements generally associated with each project category, as well as the potential for associated enrollment changes, types of construction activities, and potential for

changes associated with new operational activities such as community use of new joint-use facilities or changes in student pick-up and drop-off.

## New Acquisition and New School or Administrative Facilities

This project category includes the acquisition of new properties and the construction of new school or administrative facilities. The construction of new District-operated school facilities provides District students with the opportunity to attend a school in their neighborhood. New schools could be constructed to provide increased capacity for a cluster area, reduce travel time outside of the community, or otherwise fill an identified need within the neighborhood, such as the need for a new school to serve an increase in residential density provided for in a community plan update.

This project category also includes the construction of new charter school facilities and/or acquisition of new sites by the District to lease charter schools. Charter schools are public schools that may provide instruction in grades kindergarten through 12 (District 2018). Charter schools are usually created or organized by a group of parents, teachers and other educators, and community leaders or community-based organizations. The specific goals and operating procedures for a charter school are detailed in the agreement (or "charter") between the board and the organizers.

Proposition 39, introduced on the November 2000 ballot, amended California Education Code (CEC) Section 47614 with the intent that public school facilities should be shared fairly among all public-school pupils, including those attending charter schools. As amended, CEC Section 47614 requires that school districts make available to all charter schools operating in their school district, with projections of at least 80 units of average daily attendance, facilities that will sufficiently accommodate all of the charter schools' in-district students, and that facilities be reasonably equivalent to other classrooms, buildings, or facilities in the district. The District's Real Estate Department is responsible for managing charter school leases of District facilities. Pursuant to Proposition 39, charter schools can be collocated on the same school site as District schools, though their facilities are separate. This can typically involve the installation of portable buildings or the use of existing portables on the school site. Collocation of a charter school is equivalent to new school construction, as it would allow for a new school to operate in an area.

**Table 3-1. Improvements by Project Category**

| Project Category | Improvements | Potential Changes in Enrollment Capacity from Existing Conditions (Yes/No) | Typical Construction Activities | Potential Changes in Existing Operations (Yes/No) |
|---|---|---|---|---|
| New Acquisition and New School or Administrative Facilities | • Acquire property for construction of new school and administrative facilities.<br>• New classrooms, administrative buildings, and other school facilities, including those that meet the needs of special education or people with disabilities.<br>• New science/technology laboratories and up-to-date classroom and instructional technology systems.<br>• New outdoor play areas, including hard court areas, playfields, and other physical education facilities.<br>• New parking lot(s).<br>• Sustainable landscaping, recycled water systems for irrigation, and energy efficient facilities. | Yes | • Substantial ground disturbance<br>• Multiple years<br>• Heavy equipment, such as:<br>o Air compressors<br>o Asphalt/concrete truck<br>o Dump truck<br>o Cranes<br>o Excavator, grader, paver<br>o Tractor, loader, backhoe | Yes |
| Whole Site Modernization | • Demolition of existing facilities and the construction of new buildings including, but not limited to, the construction of new, and reconstruction of existing, library/media centers, performing arts buildings, theaters, auditoriums, and food service buildings.<br>• Improved athletic facilities, such as new athletic fields, stadiums, or public address (PA) systems, electronic scoreboards, gymnasiums and auxiliary gymnasiums, locker room improvements, field houses, and other improvements such as installation of new or replacement natural and artificial turf fields to replace existing athletic facilities or the reconfiguration of existing athletic facilities, as well as the development of field use | No | • Demolition of existing buildings<br>• Removal of portable classrooms<br>• Minor to major grading and ground disturbance<br>• Multiple years<br>• Heavy equipment (see New Acquisition and New School or Administrative Facilities above) | Yes |

| Project Category | Improvements | Potential Changes in Enrollment Capacity from Existing Conditions (Yes/No) | Typical Construction Activities | Potential Changes in Existing Operations (Yes/No) |
|---|---|---|---|---|
| | policies for school and third-party use of upgraded athletic facilities.<br>• Heating, ventilation, and air conditioning (HVAC) system upgrades or additions.<br>• Renovation of existing District administration center facilities.<br>• Construction of new permanent classroom buildings to replace existing modular, relocatable, portable, or permanent classroom buildings, or reconfiguration of existing classroom buildings.<br>• Demolition and/or removal of modular, relocatable, and portable classrooms and staging of modular, relocatable, and portable, classrooms for other District sites.<br>• Construction of new, or reconfiguration of existing, restrooms.<br>• Construction of new, or reconfiguration of existing, driveways, drop-off zones, bus loading areas, and parking lots for improved safety and circulation of vehicles and pedestrians.<br>• Slope repair. | | | |
| Upgrades of Existing School and Administrative Sites | • Construction of new, or reconfiguration of existing, driveways, drop-off zones, bus loading areas, and parking lots for improved safety and circulation of vehicles and pedestrians.<br>• Interior modernization of buildings and systems.<br>• Minimal exterior improvements.<br>• Maintenance and/or replacement of aging infrastructure and overhauls of failing building systems. | No | • Minimal to no ground disturbance<br>• Short-term<br>• Medium equipment, such as:<br>o Air compressors<br>o Cement and mortar mixers<br>o Concrete/industrial saws<br>o Cranes | No |

| Project Category | Improvements | Potential Changes in Enrollment Capacity from Existing Conditions (Yes/No) | Typical Construction Activities | Potential Changes in Existing Operations (Yes/No) |
|---|---|---|---|---|
| | • Replacement and repair of existing asphalt and concrete walkways, roadways, and other related facilities.<br>• Construction of new, or reconfiguration of existing, ADA pathways and ramps, and elevator improvements.<br>• Construction of new, or reconfiguration of existing, hardscape and landscape areas including lunch court shelters, shade structures, and playground equipment.<br>• Modernization and renovation of school facilities to comply with Title IX gender equity requirements.<br>• Replacement of fire alarms, emergency communication systems, security fencing, and various site security improvements.<br>• Technology upgrades, such as new or reconditioned wired and wireless infrastructure and equipment upgrades.<br>• Improvements to the seismic structural integrity of school buildings.<br>• HVAC system upgrades or additions.<br>• Construction of ground- or roof-mounted solar panel systems and battery backup systems.<br>• Construction of electric vehicle and equipment charging and storage facilities<br>• Utility upgrades, such as new or reconditioned electrical, water, sewer, and storm drains.<br>• Other interior finishes such as the provision of new classroom furniture, new windows and doors, interior and exterior painting and repairs, and the reconfiguration of existing classroom spaces. | | ○ Forklifts<br>○ Generator sets<br>○ Welders | |

| Project Category | Improvements | Potential Changes in Enrollment Capacity from Existing Conditions (Yes/No) | Typical Construction Activities | Potential Changes in Existing Operations (Yes/No) |
|---|---|---|---|---|
| | • Wall-, pole-, or ground-mounted electronic marquee signs, scoreboards, or other wayfinding monuments. | | | |
| Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program | • Physical construction of new recreational facilities intended for future joint use.<br>• Removal of existing decomposed granite fields.<br>• Installation of a new natural or artificial turf field.<br>• Installation of a new stabilized walking track (decomposed granite or asphalt).<br>• Construction of pools and associated facilities such as equipment buildings, bleachers, restrooms/changing facilities, and concessions facilities.<br>• Construction of additional parking to accommodate joint-use facility users in accordance with the parking requirements in the City's Municipal Code (Section 142.050 et seq.).<br>• Other minor amenities that would provide a new recreational space for students and nearby residents in the community including comfort stations, benches, hard court areas, shade trees, drinking fountains, trash cans, and dog waste stations.<br>• Utilities for electrical power, water conveyance, sewage, and drainage.<br>• Per data provided by the District, a total of 20 joint-use facilities totaling 69.09 acres would be constructed under the Proposed Program. | No | • Moderate ground disturbance<br>• Short-term<br>• Heavy equipment (see New Acquisition and New School or Administrative Facilities above) | Yes |

Acquisition of property for new school uses, including charter schools, would be conducted in accordance with all California Department of Education requirements, particularly Title 5 of the California Education Code, as well as other applicable regulations. Exact construction specifications would be determined on a project-by-project basis; however, typical features of new school construction generally consist of a wide variety of components, including, but not limited to, the following:

- New classrooms, administrative buildings, and other school facilities, including those that meet the needs of special education or people with disabilities.
- New science/technology laboratories and up-to-date classroom and instructional technology systems.
- New outdoor play areas, including hard court areas, playfields, and other physical education facilities.
- Collocation of a charter school onto an existing District school site.
- New parking lot(s).
- Sustainable landscaping, recycled water systems for irrigation, and energy efficient facilities.

Construction of new schools or administrative facilities would involve substantial ground-disturbing activities, occur over a period of several years, and require the use of heavy equipment as identified in Table 3-1 above. This project category may also include the redesign or reuse of an existing building on a site acquired by the District, which may result in minor ground disturbance. Operation of new schools, including new or collocated charter schools, would result in the congregation of students to a new area and bring different activities, such as recess and sports games, to the area. Similarly, operation of new administrative facilities would bring District staff to a new area. There are no specific new acquisitions, or new school or administrative facilities projects identified at this time. However, this PEIR analyzes the impacts of any future site acquisitions or new school or administrative facilities projects within the District at a programmatic level.

#### 3.4.1.1 Whole Site Modernization

Whole site modernization projects involve substantial redevelopment of existing school properties, including charter schools. Many schools were constructed in the mid to late-1900s, and numerous buildings remain that have been minimally updated and enhanced throughout the years. School sites where a majority of the existing facilities require upgrades and enhancements would be candidates for whole site modernization projects. Additionally, this project category includes renovation of existing District administrative facilities.

These types of projects generally consist of a wide variety of components, including, but not limited to, the following:

- Demolition of existing facilities and the construction of new buildings including, but not limited to, the construction of new, and reconstruction of existing library/media centers, performing arts buildings, theaters, and auditoriums.
- Improved athletic facilities, such as new athletic fields, stadiums, or public address (PA) systems, electronic scoreboards, gymnasiums, and auxiliary gymnasiums, locker room improvements, field houses, and other improvements such as installation of artificial turf fields to replace existing athletic facilities or the reconfiguration of existing athletic facilities, as well as

the development of field use policies for school and third-party use of both existing and improved athletic facilities.

- Construction of new permanent classroom buildings to replace existing modular or permanent classroom buildings, or reconfiguration of existing classroom buildings.
- Demolition of modular classrooms and staging of modular classrooms for other District sites.
- Construction of new, or reconfiguration of existing, restrooms.
- Slope repairs.

Other upgrades—such as security enhancement, energy improvements (e.g., renewable energy systems and energy efficiency improvements), joint-use facility development, and technology and safety repairs—can be included as part of a whole site modernization project or they can be conducted as individual and separate improvement projects. These upgrades are discussed further as separate categories in the sections below.

Construction activities associated with whole site modernization projects would generally involve substantial ground disturbance, occur in phases over a period of several years, and require the use of heavy equipment as identified in Table 3-1 above. Operation of the modernized school and administrative facility would be similar to operations as the existing facilities; however, this project category could include new or reconfigured pick-up and drop-off locations. Operation of these types of projects would not increase the student enrollment capacity of the subject school or number of staff at District administrative facilities.

### 3.4.1.2 Upgrades of Existing School and Administrative Sites

Upgrades of existing school and administrative sites, including charter schools, could involve the implementation of a variety of site-wide improvements, including, but not limited to, the following:

- Construction of new, or reconfiguration of existing, driveways, drop-off zones, bus loading areas, and parking lots for improved safety and circulation of vehicles and pedestrians.
- Construction of new, or reconfiguration of existing, ADA pathway, ramp, and elevator improvements.
- Construction of new, or reconfiguration of existing, hardscape and landscape areas.
- Modernization and renovation of school facilities to comply with Title IX gender equity requirements.
- Improvements to visual and performing arts, physical education, athletic, and science education facilities.
- Replacement of fire alarms, emergency communication systems, security fencing, and various site security improvements.
- Technology upgrades, such as wired and wireless infrastructure and equipment upgrades.
- Improvements to the seismic structural integrity of school buildings.
- HVAC system upgrades or additions.
- Installation of solar panels and other energy efficiency upgrades.
- Utility upgrades, such as electrical, water, sewer, and storm drains.

- Other interior finishes such as the provision of new classroom furniture, interior and exterior painting and repairs, and the reconfiguration of existing classroom spaces.
- Wall, pole, or ground mounted marquee sign or other wayfinding monuments.

These improvements would be implemented at schools and administrative facilities that require minimal, specific improvements instead of whole site modernization. Improvements such as ADA upgrades; Title IX improvements; overhauls of failing building systems; painting, window replacement, and maintenance and repair activities; emergency system improvements; electrical and technological upgrades; and improvements to performing arts, athletic, and science education facilities would be broad and vary across each school campus or administrative site; however, these improvements could generally include installation of ramps outside buildings and interior upgrades to existing structures. Safety improvements to circulation and parking areas could include restriping and repaving of existing paved areas.

Specific designs for HVAC system improvements or additions that would be installed under this project category would vary depending on the existing site plan for each school campus or administrative site. HVAC system improvements could include the installation of units and duct work on the roof or windows of existing buildings, as well as electrical work and construction within building interiors. Minimal trenching may be required for condensate drainage or other utilities.

Solar panel or other energy efficiency upgrades under this project category would typically consist of solar photovoltaic arrays mounted onto building roofs or canopies in parking lots with associated monitoring equipment and electrical wiring for the inverters and integrated disconnects. While less common, ground-mounted solar arrays could also be installed under this project category. Electrical transmission lines may be installed in underground conduit.

Marquee signs installed under this project category would typically be 5- by 9-foot, single- or double-sided, and would include an internally illuminated full-color LED, dimmable, and timer controlled display. Additionally, the marquee signs would use full-color LED lighting to create text and graphics. The text could be displayed using a variety of display options such as sparkle, flash, blink, and scroll to create a message. Transitions between messages would typically occur every 1 to 4 seconds, with individual messages being displayed between approximately 4 and 10 seconds. Lastly, marquee signs would either be wall or dual pole mounted on the school campus. The District would pre-program any new marquee signs to automatically turn off from 11:00 p.m. to 7:00 a.m., for consistency with the City of San Diego Municipal Code, Chapter 14, General Regulations.

Construction of these types of projects would generally result in minimal or no ground-disturbing activities and would not require the use of heavy equipment. The construction period would typically last less than a year. Operation of these types of projects would not increase the student enrollment capacity of the subject school or the number of staff at District administrative facilities, and would not change or add activities at existing school sites.

### 3.4.1.3 Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

Joint use facility projects involve construction and operation of new recreational facilities intended for future joint use between the District and City of San Diego as part of the Play All Day Program. The Play All Day Program is a collaboration between the District and City to expand recreational opportunities throughout San Diego and help the City address park space deficiencies in each of its

communities. Under the Play All Day Program, new joint-use parks would be constructed by the District on existing school sites using bond funds, while the City Parks and Recreation Department would be responsible for operation and maintenance of the new facilities.

In addition, this project category includes future joint-use agreements administered at existing recreational facilities, operation of existing joint-use agreements at existing recreational facilities, and extensions of existing joint-use agreements. Joint-use with the City of San Diego would be consistent with the Recreation Agreement of September 1948 between the City of San Diego and the San Diego Unified School District, and the Memorandum of Understanding Between the City and District for the Development and Maintenance of Joint Use Facilities adopted by the San Diego City Council on October 7, 2002 (Resolution No. 297149) and by the District's Board of Education on October 8, 2002. These projects can typically include the following components:

- Removal of existing decomposed granite fields.
- Installation of a new natural or artificial turf field.
- Installation of a new stabilized walking track (decomposed granite or asphalt).
- Construction of pools and associated facilities such as equipment buildings, bleachers, restrooms/changing facilities, and concessions facilities.
- Construction of additional parking to accommodate joint-use facility users in accordance with the parking requirements in the City's Municipal Code (Section 142.050 et seq.).
- Other minor amenities that would provide a new recreational space for students and nearby residents in the community, including comfort stations, benches, hard court areas, shade trees, drinking fountains, trash cans, and dog waste stations.
- Utilities for electrical power, water conveyance, sewage, and drainage.

Per data provided by the District, a total of 20 joint-use facilities totaling 69.09 acres would be constructed under the Proposed Program. The joint-use facilities developed under this project category may be used for organized sports activities. The size of each joint-use field would dictate the type of organized sports activity. Each field can range in size, but would typically be suitable for junior soccer league play and practice for ages 11 and younger, as well as a variety of other sports. In addition, any new pools constructed under this category would typically be up to 50 meters by 25 yards, but may be smaller depending on the need.

A joint-use agreement that specifies details of the use—such as the hours of operation, types of activities/sports allowed, how the gates would be locked if a custodian is not available, and maintenance details—can be executed between the District and the City of San Diego's Parks and Recreation Department. Generally, these agreements stipulate that the District would have exclusive use of the joint-use facilities from 30 minutes before each school campus opens until 30 minutes after the school's dismissal bell on Monday through Friday while school is in session. The community would have use of the fields 30 minutes after school until 30 minutes before school, Monday through Thursday, and 30 minutes after school on Friday until 30 minutes before school on Monday. The agreements are typically for 25 years. The City is typically responsible for maintenance of all facilities within the joint-use area. For natural turf joint-use fields, the City's Parks and Recreation Department would be responsible for the provision of water to the site. The Parks and Recreation Department is applying new watering methods to irrigate responsibly within San Diego's various climate zones and is prioritizing water use on athletic fields such as joint-use areas (City of San Diego 2020). According to the current San Diego Municipal Code (Section 67.3804(g)), the Parks

and Recreation Department is exempt from watering time restrictions; however, it must comply with targeted water-use restrictions, including reductions of overall water use. Active recreational turf areas are currently irrigated three times per week (City of San Diego 2020).

Construction activities associated with installation of fields, walking tracks, parking, or other recreational facilities would generally involve minimal ground disturbance and light equipment. Construction of pools would require deep excavation and other ground disturbance for associated facilities using heavy equipment. The construction period would typically last less than a year. Operation of joint-use facilities would not increase student enrollment capacity but would increase the frequency of use of these facilities by the community, consistent with the stipulations in the joint-use agreements, as described above.

## 3.4.2 Near-Term, Site-Specific Whole Site Modernization Projects

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 existing school sites, as provided in Table 3-2. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the Whole Site Modernization project category. The analysis for these near-term projects relies on the assumptions for the Whole Site Modernization project category provided in Table 3-1 above.

**Table 3-2. Near-Term, Site-Specific Whole-Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Elementary School | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Elementary School | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019

## 3.4.3 San Diego Unified School District CEQA Handbook

This component of the Proposed Program involves preparation of a *San Diego Unified School District CEQA Handbook* to guide District staff through the CEQA process. Largely informed by the results of the analyses contained in this PEIR as well as the District's experience on previous projects, the CEQA Handbook has been prepared with the intent of assisting the District's Facilities Planning and Construction (FPC) Division, their construction contractors, and other parties working with the District during implementation of the Capital Improvement Program. The CEQA Handbook outlines the requirements of CEQA, including the process for tiering future CEQA analyses off this PEIR, identify screening criteria for being able to narrow or eliminate potential issues, summarize the range of potential impacts that could occur under each project category, and identify mitigation measures to reduce potential impacts of subsequent projects. The CEQA Handbook consolidates applicable District, regional, state, and federal regulations; existing procedures; and policies that provide the basis for environmental review pursuant to CEQA. Generally, the CEQA Handbook is designed to:

- Ensure the consistency, accuracy, and completeness of environmental documents prepared by the District and/or its consultants.
- Streamline CEQA review of future projects by establishing a uniform, consistent approach for the District's environmental review process, including the adoption of a consistent set of screening criteria and mitigation measures that can be applied across all District projects.

The CEQA Handbook is intended to give staff and consultants preparing environmental documents a consistent analysis approach by providing relevant background information; applicable rules and regulations; consistent methodology, screening, and significance criteria; and potential mitigation measures. A draft of the CEQA Handbook is provided in Appendix A of this PEIR.

## 3.4.4 District Departments Responsible for Implementation of the Proposed Program

There are four primary development-oriented departments that would be responsible for implementing the Proposed Program and for the acquisition, planning/construction, and maintenance of District facilities: FPC Division, Real Estate Department, Instructional Facilities Planning Department, and Physical Plant Operations Department. Each of these divisions/departments is described below.

### 3.4.4.1 Facilities Planning and Construction Division

The District's FPC Division is responsible for the planning and construction of individual capital improvement projects at District facilities. The mission of the FPC Division is to design and construct clean, safe, environmentally friendly facilities that encourage successful teaching and learning. The services within FPC are strategic planning, project management (including the design phase), construction management, business outreach, contracts compliance (post-award), labor compliance, program management, and implementation of the District's Project Stabilization Agreement for Proposition S.

### 3.4.4.2 Real Estate Department

The Real Estate Department, which is part of the Facilities Planning and Construction Division, works to fulfill the District's Vision 2020 goals. The Real Estate Department conducts strategic portfolio planning and optimization, property management, and information related to easements, assessments, encroachments, permits, leases, licenses, and developer fees. The vision of the Real Estate Department is to contribute to the creation of opportunities for students through support services dedicated to the stewardship and community use of the District's real estate assets in alignment with Vision 2020 goals. This is achieved through a real estate utilization strategy that includes the following.

- Maximizing the public use of District-owned sites and open space.
- Pursuing long-term joint development opportunities by developing properties as neighborhood centers providing neighborhood services.
- Building capacity to generate ongoing revenue that directly supports school sites.
- Creating partnerships that help maintain real estate assets to a high standard and resource for the community.

### 3.4.4.3 Instructional Facilities Planning Department

The Instructional Facilities Planning Department develops forecasts, reports, and recommendations that support the District's short- and long-range planning decisions. This department also develops annual school and District enrollment forecasts, develops and maintains school attendance boundaries; manages facilities allocation to charter schools under Proposition 39 as well as through 5-year multi-year facilities license agreements, and assists in developing and updating the long-range facilities master plan and educational specification guidelines for the construction of new schools and upgrading of existing schools.

### 3.4.4.4 Physical Plant Operations Department

Physical Plant Operations, a department within the Operations Division, manages the maintenance planning and repair of the District's inventory of buildings. This inventory includes approximately 14.8 million square feet of buildings situated on 2,600 acres of developed property. Physical Plant Operations is composed of several departments, including Maintenance Planning, Maintenance Services, Custodial Services, Landscape, and Integrated Pest Management. Physical Plant Operations is responsible for all fixed assets within the District's property line, such as parking lots, lunch courts, playgrounds, underground water and sewer systems, electrical systems, communication systems, and physical structures.

## 3.4.5 Funding Mechanisms

The Proposed Program would be implemented by several funding mechanisms. The existing primary funding mechanism is through three general obligation bond measures: Propositions S and Z, and Measure YY. The District's FPC Division manages the implementation of these three bond measures, which together total approximately $8.4 billion. Proposition S is a $2.1 billion bond measure that was approved by San Diego voters in 2008, while Proposition Z is a $2.8 billion bond measure passed in 2012. Most recently, Measure YY is a $3.5 billion bond measure that was passed by San Diego voters in November 2018. The District does not receive these funds at once. Rather, the

District receives funds from these bond measures in increments based on bond issuances, which occur approximately every 2 years. To provide a quality school in every neighborhood, the District is using Proposition S, Proposition Z, and Measure YY funds to repair, renovate, and revitalize District schools. Other funding mechanisms include, but are not limited to, grants, residential, commercial, and industrial developer impact fees, State Facility Program match, qualified zone academy bonds, qualified school construction bonds, property management funds, and future bond measures.

# 3.5 Project Review and Approvals

The District is the lead agency under CEQA and is responsible for approving and implementing the Proposed Program. There are also several responsible agencies that would grant approvals or permits for future projects facilitated by the Proposed Program. Furthermore, there are several reviewing agencies that would potentially review and/or issue permits for the various components of the Proposed Program. Table 3-3 lists the agencies that are anticipated to issue approvals or permits for, and/or review, the Proposed Program.

**Table 3-3. Anticipated Agency Actions**

| Lead Agency | Discretionary Action | Trigger |
|---|---|---|
| **District** | | |
| District Board of Education | • Certification of the Final EIR | Lead Agency approval required |
| | • Adoption of the Mitigation Monitoring and Reporting Program | |
| | • Adoption of the Findings of Fact | |
| | • Adoption of the Statement of Overriding Considerations, if applicable | |
| | • Adoption of *San Diego Unified School District CEQA Handbook* | |
| **Federal** | | |
| U.S. Army Corps of Engineers | • Clean Water Act Section 404 Permit | Dredging or discharge of fill materials into Waters of the U.S. |
| U.S. Fish and Wildlife Service | • Section 7 (federal nexus) or 10 (no federal nexus) Permit | Impacts on federally listed species |
| **State** | | |
| California Department of Education | • Approval of final site and school design | New school acquisition or use of State funds for a project |
| Office of the Division of State Architect | • Administrative Approval of Project Design for Compliance with California Code of Regulations Title 24 | Construction or renovation of specific building facilities on a school site |
| California Department of Fish and Wildlife | • No Effect Determination Assessment | Filing of a Negative Declaration (ND), Mitigated Negative Declaration (MND), or EIR |

| Lead Agency | Discretionary Action | Trigger |
|---|---|---|
| California Coastal Commission | • Coastal Development Permit | Project within the Coastal Zone and in the California Coastal Commission's permit jurisdiction |
| State Water Resources Control Board | • Review of Notice of Intent to obtain permit coverage<br>• Issuance of General Permit for Discharges of Stormwater Associated with Construction Activity<br>• Review of Stormwater Pollution Prevention Plan | Any ground disturbance greater than 1 acre |
| Department of Toxic Substances Control | • Review and approve Preliminary Endangerment Assessment/Removal Action Workplan (PEA/RAW) | Any cleanup activity for any new school site or existing contaminated school sites |
| **Regional** | | |
| Local Native American Tribes | • Coordination and assistance with preparation of Native American monitoring programs (Assembly Bill [AB] 52 consultation) | Requests for AB 52 Consultation by Local Native American Tribes |
| San Diego Regional Water Quality Control Board | • Issue National Pollution Discharge Elimination System (NPDES) permit<br>• Clean Water Act Section 401 Water Quality Certification | Dredging or discharge of fill materials into Waters of the State |
| **Local** | | |
| City of San Diego | • Public Right-of-Way Permit | • Improvements within City of San Diego right-of-way |
| | • Issuance of Ministerial Permits (e.g., grading, building, electrical) | • Required for non-District owned sites and other facilities where Division of the State Architect approval is not sought after |
| | • Coastal Development Permit | • Project within the Coastal Zone and in the City of San Diego's permit jurisdiction |
| | • Joint-Use Agreement | • Entering into a joint-use agreement for any existing or planned recreational facilities |

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# Chapter 4
# Environmental Analysis

This chapter contains the program-level and site-specific analysis for the potentially significant environmental effects of the Proposed Program. Each section contains a description of the existing conditions, CEQA impact significance criteria, an analysis of the potential impacts, and mitigation proposed to reduce those impacts.

As discussed in Chapter 1, *Introduction*, this PEIR is evaluating the environmental effects of the Proposed Program at a programmatic level in accordance with Section 15168 of the State CEQA Guidelines. According to Section 15168, a PEIR may be prepared on a series of actions that can be characterized as one large project and that are related either geographically or as individual activities carried out under the same authorizing statutory or regulatory authority and that generally have similar environmental effects that can be mitigated in similar ways. One of the benefits of preparing a PEIR is that it allows for a reduction in paperwork by streamlining future subsequent activities found to be within the scope of the program described in the Draft PEIR. In addition, the analyses contained herein provide the bases for the screening criteria and mitigation measures that have been incorporated into the *San Diego Unified School District CEQA Handbook* (Appendix A). The CEQA Handbook implements the findings and recommendations of this PEIR, and, therefore, do not, in and of themselves, have environmental impacts requiring further analysis.

## Potential Environmental Impacts

The following resource areas are described and analyzed in this chapter.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gases and Energy
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise and Vibration
- Paleontological Resources
- Recreation
- Transportation
- Tribal Cultural Resources

- Utilities
- Wildfire

It was determined in the Initial Study/Environmental Checklist (Appendix B) that the Proposed Program would have no impact or less-than-significant impacts associated with the following resources: Agriculture and Forestry Resources, Mineral Resources, Population and Housing, and Public Services. Additionally, it was determined during the preparation of this Draft PEIR that the Proposed Program would have no impact or less-than-significant impacts associated with Land Use and Planning. These topics are described in Chapter 6, Section 6.4, *Effects Found Not to Be Significant,* of this Draft PEIR.

Cumulative impacts are described in Chapter 5, *Cumulative Impacts;* growth inducement is discussed in Chapter 6, *Additional Considerations*; and alternatives to the Proposed Program are discussed in Chapter 7, *Alternatives*.

# Format of the Environmental Analysis

Each of the 16 environmental resource sections of this chapter includes the following subsections.

## Overview

This subsection briefly describes the thresholds of significance considered in the particular resource section, identifies any reports that contain information presented in the environmental analysis, and summarizes the environmental effects of the Proposed Program and any necessary mitigation measures.

## Existing Conditions

According to Section 15125 of the State CEQA Guidelines, an EIR must include a description of the existing physical environmental conditions in the vicinity of a project to provide the "baseline condition" against which project-related impacts are compared. Normally, the baseline condition is the physical conditions that exist when the Notice of Preparation (NOP) is published; however, a different baseline may be used in specific cases where it is deemed appropriate. The NOP was published on March 22, 2019. Unless indicated otherwise, the environmental setting described in each of the following sections will be the conditions that existed at the time the NOP was published.

## Applicable Laws and Regulations

This subsection provides a summary of regulations, plans, policies, and laws at the federal, state, and local levels applicable to the Proposed Program as they relate to the particular environmental resource area in discussion. Compliance with these applicable laws and regulations is mandatory unless noted otherwise within the analysis. Therefore, as it relates to the *Impact Analysis* below, compliance is assumed because it is required by law, and mitigation generally would not be required when the Proposed Program's compliance with an existing law or regulation would avoid or reduce a significant impact.

# Impact Analysis

This subsection describes the methodology used for the program-level and site-specific analysis of the potential environmental impacts of the Proposed Program; identifies the criteria for determining the significance of potential impacts; discusses the nature and magnitude of potential impacts; and states a conclusion as to whether the environmental impacts would be considered significant and unavoidable, less than significant with mitigation incorporated, or less than significant. The discussion of potential impacts is based on the applicable threshold of significance (see below) for each issue. Each threshold analyzed is divided into specific issues, based on potential impacts, and addresses construction and operation impacts separately for each of the project categories associated with the Proposed Program wherever relevant. Due to the requirements to analyze some issues, such as air quality, greenhouse gas emissions, and energy, at the regional or cumulative level, these analyses consider impacts for buildout of the entire program in addition to the individual project categories. Where potential impacts are significant, feasible mitigation measures are identified to minimize, rectify, reduce, eliminate, or compensate for significant impacts with the goal of reaching a less-than-significant impact determination.

## Methodology

Each methodology subsection describes the means used to analyze potential impacts for that particular resource, discussing the steps followed and listing any studies relied on to determine significance.

## Thresholds of Significance

Thresholds of significance are criteria used to assess whether potential environmental effects are significant. The significance criteria used in this analysis are primarily based on the recommendations provided in Appendix G of the State CEQA Guidelines. The thresholds of significance define the type, amount, and/or extent of impact that would be considered a significant adverse change in the environment. The thresholds of significance for some environmental topics, such as certain air quality and noise issues, are quantitative, while thresholds for other topics, such as aesthetics, are often qualitative. The thresholds of significance are intended to assist the reader in understanding how an impact is determined to be significant and are based on substantial evidence in the administrative record.

## Impacts and Mitigation Measures

### Impact Discussion

For this PEIR, each impact discussion is organized around the Proposed Program's project categories, and the analysis of environmental impacts considers both the construction and operation of each project category as well as construction and operational impacts of 21 near-term, site-specific whole site modernization projects. As required by Section 15126.2(a) of the State CEQA Guidelines, direct, indirect, short-term, long-term, onsite, and/or offsite impacts are addressed, as appropriate, for the environmental issue being analyzed.

## Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires an EIR to "describe feasible measures which could minimize significant adverse impacts." Mitigation includes avoiding an impact altogether, minimizing impacts, rectifying impacts, reducing or eliminating impacts over time, or compensating for impacts by replacing or providing substitute resources. The State CEQA Guidelines define *feasibility* as "capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, legal, social, technological, or other considerations." This subsection lists the mitigation measures that could reduce the severity of impacts identified in the *Impact Discussion* subsection. Mitigation measures are the specific environmental requirements for construction or operation of the Proposed Program that will be included in the Mitigation Monitoring and Reporting Program and adopted as conditions of approval for the Proposed Program.

# 4.1.1 Overview

This section describes the aesthetic and visual conditions that could be adversely affected by the proposed project, discusses the applicable laws and regulations related to aesthetics and visual quality, and analyzes the proposed project's effect on (1) designated scenic views, (2) scenic resources from a designated state scenic highway, (3) the existing visual character of the site and its surroundings, and (4) day and nighttime views affected by introducing light or glare. Visual concepts and terminology are present below. For an explanation of viewer sensitivity for the impact analysis, please see Section 4.1.4.1, *Methodology*.

Table 4.1-1 summarizes the significant impacts and mitigation measures (MM) discussed in Section 4.1.4.3, *Impacts and Mitigation Measures*.

**Table 4.1-1. Summary of Significant Aesthetics Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact-AES-1:** Potential to Result in Adverse Effects on Views Within a Vista Area During Construction of New School or Administrative Facilities. | **MM-AES-1**: Install Construction Screening and Fencing. | Significant and Unavoidable | Because the prominence of any newly acquired site and the extent of construction activities within a scenic viewshed are not known at this time, it cannot be concluded that MM-AES-1 would be able to completely mitigate this impact. |
| **Impact-AES-2**: Potential to Result in Adverse Effects on Views Within a Vista Area During Operation of New School or Administration Facilities. | **MM-AES-2**: Minimize Intrusions into the Viewshed from New School or Administrative Facilities. | Significant and Unavoidable | Because specific sites and plans are unknown at this time, and site constraints or project specifications may reduce flexibility related to site or building design, the potential still exists for new school or administrative facilities to adversely affect a scenic vista. |
| **Impact-AES-5:** Potential to Damage Scenic Resources Within an Eligible or Officially Designated State | **MM-AES-4:** Preserve Scenic Resources. | Significant and Unavoidable | Specific sites are not known at this time and site or project constraints may require removal of a scenic resource; thus, it |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| Scenic Highway During New Construction. | | | cannot be concluded that MM-AES-4 would be able to completely mitigate this impact. |
| **Impact-AES-7**: Degradation of Visual Character and Quality During Construction | **MM-AES-1**: Install Construction Screening and Fencing. | Less than Significant | Implementation of MM-AES-1 would shield construction activities for new school and administrative facilities from public views in the area surrounding the project site. |
| **Impact-AES-8:** Substantial Increase of Nighttime Lighting. | **MM-AES-5:** Conduct a Lighting Analysis and Minimize Impacts on Nearby Residences. | Significant and Unavoidable | Because the degree of lighting impacts from new athletic fields on nearby residences cannot be quantified at this time, impacts remain significant and unavoidable. |
| **Whole Site Modernization** | | | |
| **Impact-AES-3:** Potential to Result in Adverse Effects on Views Within a Vista Area During Construction of Whole Site Modernizations. | **MM-AES-1**: Install Construction Screening and Fencing. | Significant and Unavoidable | Because the proximity and prominence of construction activities within a scenic vista are not known, it cannot be concluded that MM-AES-1 would reduce impacts to less-than-significant levels. |
| **Impact-AES-4:** Potential to Result in Adverse Effects on Views Within a Vista Area During Operation of Existing District Sites and Facilities. | **MM-AES-3:** Prepare Visual Simulations to Evaluate the Project's Potential to Affect Scenic Vistas and Minimize Intrusions into the Viewshed at Existing District Facilities. | Significant and Unavoidable | Site plans are not known at this time, and because site constraints or project specifications may reduce flexibility related to building design, even with mitigation, the potential still exists for whole site modernization projects to adversely affect a scenic vista. |
| **Impact-AES-6:** Potential to Damage Scenic Resources Within an Eligible or Officially Designated State Scenic Highway. | **MM-AES-4:** Preserve Scenic Resources. | Significant and Unavoidable | Site plans are not known at this time, and because site constraints or project specifications may reduce flexibility related to building design, even with mitigation, the potential still exists for whole site |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | modernization projects to adversely affect a scenic vista. |
| **Upgrades of Existing School and Administrative Sites** | | | |
| **Impact-AES-4:** Potential to Result in Adverse Effects on Views Within a Vista Area During Operation of Existing District Sites and Facilities. | **MM-AES-3**: Prepare Visual Simulations to Evaluate the Project's Potential to Affect Scenic Vistas and Minimize Intrusions into the Viewshed at Existing District Facilities. | Significant and Unavoidable | Specific upgrades are not known at this time, and because site constraints or project specifications may reduce flexibility related to building design, even with mitigation, the potential still exists for upgrades of existing school and administrative sites to adversely affect a scenic vista. |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| **Impact-AES-4:** Potential to Result in Adverse Effects on Views Within a Vista Area During Operation of Existing District Sites and Facilities. | **MM-AES-3**: Prepare Visual Simulations to Evaluate the Project's Potential to Affect Scenic Vistas and Minimize Intrusions into the Viewshed at Existing District Facilities. | Significant and Unavoidable | Specific development sites are not known at this time, and because site constraints or project specifications may reduce flexibility related to placement of structures, even with mitigation, the potential still exists for joint-use facilities development projects to adversely affect a scenic vista. |
| **Impact-AES-6:** Potential to Damage Scenic Resources Within an Eligible or Officially Designated State Scenic Highway. | **MM-AES-4**: Preserve Scenic Resources. | Significant and Unavoidable | Because specific site plans are unknown at this time, it is possible that construction of joint-use facilities could still result in the damage or removal of scenic resources. |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| All impacts identified for Near-Term, Site-Specific Whole Site Modernization Projects were less than significant. | No mitigation is required. | Less than Significant | N/A |

### 4.1.1.1 Concepts and Terminology

This section defines the key concepts and terminology used to describe existing aesthetic and visual quality conditions or to describe the change in existing conditions from implementation of the Proposed Program. Although there may be more than one definition for any of the terms below, these common definitions are used for analytical consistency.

*Views* refer to visual access and obstruction, or whether it is possible to see a focal point or panoramic scene from an area. Views may be discussed in terms of *foreground*, *middleground*, and *background.* Foreground views are those immediately presented to the viewer and include objects at close range that may tend to dominate the view. Middleground views occupy the center of the viewshed and tend to include objects that are the center of attention if they are sufficiently large or visibly different from adjacent visual features. Background views include distant objects and other objects that make up the horizon. Objects in the background eventually fade to obscurity with increasing distance. In the context of background, the skyline or the ocean can be an important visual feature because objects above this point are highlighted against the background of the sky or water. These "skylined" elements are typically more evident to the viewer because of their inherent contrast.

*Visual quality* is evaluated based on the relative degree of vividness, intactness, and unity within a landscape, as modified by viewer preference and sensitivity. *Vividness* is the visual power or memorability of landscape components as they combine in striking and distinctive visual patterns. *Intactness* is the visual integrity of the natural and human-built landscape and its freedom from encroaching elements; this factor can be present in well-kept urban and rural landscapes, and in natural settings. *Unity* is the visual coherence and compositional harmony of the landscape considered as a whole; it frequently attests to the careful design of individual components in the landscape. High-quality views are highly vivid and relatively intact, and exhibit a high degree of visual unity. Low-quality views lack vividness, are not visually intact, and possess a low degree of visual unity (FHWA 2015).

The following additional definitions pertain to terminology used in visual analysis.

- *Aesthetics* generally refers to the identification of visual resources and the quality of what can be seen, or the overall visual perception of the environment.
- *Viewer sensitivity*, or viewer concern about noticeable changes to views, is based on the visibility of a scenic resource, proximity of viewers to the resource, relative elevation of viewers to the resource, frequency and duration of views, number of viewers, and types and expectations of the viewers.
- *Viewshed* is all of the surface area visible from a particular location or sequence of locations (e.g., roadway or trail).

## 4.1.2 Existing Conditions

As discussed in Chapter 2, *Environmental Setting*, District schools are divided into 16 clusters that have been organized geographically and encompass the entire city of San Diego. The following discussion identifies and describes the existing scenic views, scenic highways, visual character, and light and glare conditions within the Program area.

### 4.1.2.1 Regional Context

The Program area is primarily located within the city of San Diego, but also includes small portions of the city of La Mesa, the city of Lemon Grove, and unincorporated San Diego County. However, all existing District facilities are within the boundaries of the city of San Diego. San Diego is a city in a region with varied landscapes—ocean, bays, and beaches; estuaries and river valleys; canyons and mesas; hills and mountains; and desert. Much of the city is situated in the coastal plain portion of southwestern San Diego County. This coastal plain slopes gently upward to the eastern foothills. Numerous side canyons have incised the coastal plain, creating large mesas that serve as the foundation of various San Diego neighborhoods. San Diego's location bordering the Pacific Ocean also contributes to the natural setting of the area, with many visual resources located within the coastal zone, including the city's beaches, bays, shoreline, and coastal canyons and the many rivers, streams, and other watercourses that drain inland areas, eventually reaching the coastal environment and waters.

### 4.1.2.2 Scenic Vistas

The city of San Diego is divided into over 50 communities or subareas, each with a community or subarea plan that refines the citywide goals and policies to address issues unique to these individual communities. Community plans also identify scenic vistas important to that community (City 2019). Table 4.1-2 identifies scenic vistas identified in each community plan and any District facilities within the viewshed of a scenic vista. It should be noted that the District's cluster boundaries do not always align with the city's community plan boundaries and several clusters contain portions or all of several communities. Therefore, scenic vantage points listed under each cluster are only those that fall within the portion of the community plan within the cluster, although, in some cases, District facilities may fall within the viewshed of a scenic vista that is located in the adjacent community plan.

**Table 4.1-2. Designated Scenic Vistas**

| Identified Vantage Point | Viewshed | District Facilities Potentially Within Viewshed | Clusters within CPA Boundaries |
|---|---|---|---|
| **Barrio Logan/Harbor 101 Community Plan (Adopted 1978, Last Amended 1991)** | | | |
| Harbor Drive Bridge over Switzer Creek | San Diego Bay | None | San Diego |
| Chollas Creek | San Diego Bay | None | San Diego |
| Logan Avenue | Centre City skyline and major industrial waterfront | Perkins Elementary | San Diego |
| National Avenue | Centre City skyline and major industrial waterfront | Perkins Elementary | San Diego |
| Northern portion of community | Centre City skyline and major industrial waterfront | None | San Diego |
| **Black Mountain Ranch Subarea Plan (Adopted 1998, Last Amended 2009)** | | | |
| Not in Program area | | | |
| **Carmel Mountain Ranch Community Plan (Adopted 1984, Last Amended 1999)** | | | |
| Not in Program area | | | |
| **Carmel Valley Community Plan (Adopted 1984, Last Amended 1999)** | | | |
| Not in Program area | | | |
| **Clairemont Mesa Community Plan (Adopted 1989, Last Amended 2011)** | | | |
| Designated open spaces west of Clairemont Drive | Views facing west to Mission Bay and Pacific Ocean | Cadman Elementary, Toler Elementary, Bay Park Elementary | Clairemont, Madison |
| Communitywide | Many neighborhoods along the mesa overlook Mission Bay and the Pacific Ocean to the west, Fortuna Mountain and Cowles Mountain to the east, and the open space canyon system | None | Clairemont, Madison |
| **College Area Community Plan (Adopted 1989, Last Amended 2019)** | | | |
| No views identified in current community plan | N/A | None | Crawford, Henry |
| **Del Mar Mesa Specific Plan (Adopted 2000)** | | | |
| Not in Program area | | | |

| Identified Vantage Point | Viewshed | District Facilities Potentially Within Viewshed | Clusters within CPA Boundaries |
|---|---|---|---|
| **Downtown/City Centre (Adopted 2006)** | | | |
| View corridors from Kettner Street along most east/west-oriented streets from Laurel Street in the north to G Street in the south | Views of the San Diego Bay | None | San Diego |
| Westward view corridor along Cedar Street from 1st Avenue to Pacific Highway | View of San Diego County Administrative Building | None | San Diego |
| Westward view corridor along Broadway from Park Boulevard to Harbor Drive | Views of the San Diego Bay | None | San Diego |
| Southward view corridor along Harbor Drive from Laurel Street to the Bay | Views of the San Diego Bay, waterfront parks, water-dependent recreational uses (marinas, maritime museum, cruise ships, tour boats, etc.), downtown skyline | None | San Diego |
| Southward view along Kettner Street, from G Street to Embarcadero Marina Park North | Views of the San Diego Bay, waterfront park, Seaport Village | None | San Diego |
| Southwestward view along Park Boulevard from K Street to the San Diego Bay | Views of the San Diego Bay, Embarcadero | None | San Diego |
| **East Elliott Community Plan (Adopted 1971, Last Amended 2015)** | | | |
| No views identified in current community plan | N/A | None | Unassigned |
| **Encanto Community Plan (Adopted 2015)** | | | |
| Southward views from Federal Boulevard/SR-94 between 60th Street and Kelton Road | Views of the undeveloped, open space hillside and trails associated with Emerald Hills Park | Johnson Elementary (adjacent to the viewshed areas, but not visible from them) | Lincoln |
| Southerly views along 60th Street | Views of the undeveloped, open space hillside and trails associated with Emerald Hills Park | None | Lincoln |
| Westward views along Zircon Street | Panoramic views toward the west | Johnson Elementary (adjacent to the viewshed areas, but not visible from them) | Lincoln |
| Westward views from 60th Street between Broadway and Burian Street | Views of undeveloped open space hillsides | None | Lincoln |
| Northwestward/northeastward views from Hilltop Drive and 45th Street | Holy Cross Cemetery | None | Lincoln |

| Identified Vantage Point | Viewshed | District Facilities Potentially Within Viewshed | Clusters within CPA Boundaries |
|---|---|---|---|
| Southeastward views from I-805/SR-94 interchange | Holy Cross Cemetery | Gompers Prep | Lincoln |
| Northwestward views from Valencia Parkway and roughly Richeth Road and southwestward views from Valencia Parkway | Undeveloped open space | Valencia Park Elementary | Lincoln |
| Southward views from Skyline Drive | Martin Luther King Community Park | None | Lincoln |
| Southward views along 65th Street from roughly Skyline Drive | Martin Luther King Community Park; panoramic views of southern hillsides | None | Lincoln |
| Southerly views down Woodman Street from Madrone Avenue to Plaza Boulevard | Panoramic views of southern hillsides | Morse High School | Lincoln |
| **Greater Golden Hill (Adopted 2016)** | | | |
| Multiple westward viewsheds or view corridors identified at most intersections along 28th Street | Balboa Park Municipal Golf Course | None | San Diego |
| Multiple eastward viewsheds or view corridors identified along or near eastern boundary of community plan area | Eastern mountains | None | San Diego |
| Multiple eastward/westward viewsheds identified along the streets adjacent to the 32nd Street canyon | Open space/canyon views | None | San Diego |
| Multiple northward viewsheds identified along Russ Boulevard from 24th Street to 28th Street | Balboa Park | None | San Diego |
| East-west view corridors along B Street for most of the length of the community plan area | Wide viewshed of the community with downtown skyline appearing in western portion of the corridor and canyons/eastern mountains appearing in eastern views | Garfield High School (western views), Golden Hill Elementary (eastern views) | San Diego |
| Eastern view corridors along Cedar and C Streets roughly from 32nd Street | Canyons and eastern mountains | Golden Hill Elementary (in C Street viewshed) | San Diego |
| Western view corridors along C Street, Broadway, E Street, and F Street | Downtown skyline | None | San Diego |

| Identified Vantage Point | Viewshed | District Facilities Potentially Within Viewshed | Clusters within CPA Boundaries |
|---|---|---|---|
| Southern view corridors along 28th Street (from A Street), 30th Street (from C Street), Bancroft Street (from Cedar Street), and 34th Street (from A Street) | Open space/canyon views | Golden Hill Elementary (within Bancroft Street viewshed) | San Diego |
| **Kearny Mesa Community Plan (Adopted 1992, Last Amended 2018)** | | | |
| I-805, SR-52, I-15 | Create attractive views toward the community | None | Kearny, Madison |
| **La Jolla Community Plan (Adopted 2003, Last Amended 2014)** | | | |
| Communitywide | View corridors, viewsheds or scenic vistas with panoramic, partial or intermittent views of the ocean/west coast | La Jolla High School, Muirlands Middle School, Torrey Pines Elementary | La Jolla |
| **Linda Vista Community Plan (Adopted 1998, Last Amended 2011)** | | | |
| Tecolote Canyon | Protect public views of the canyon | None | Clairemont, Kearny |
| **Midway-Pacific Highway Community Plan (Adopted 2018)** | | | |
| View corridors within rights-of-way of Kettner Boulevard, Redwood, Palm, and Olive Streets | San Diego Bay | None | Point Loma |
| **Miramar Ranch North Community Plan (Adopted 1980, Last Amended 2016)** | | | |
| Miramar Lake | Views from and of the lake | Miramar Ranch Elementary School | Scripps Ranch |
| Westward views from the western escarpment of the community plan area | Views of the ocean and mesas | None | Scripps Ranch |
| **Mira Mesa (Adopted 1992, Last Amended 2011)** | | | |
| Los Penasquitos Canyon Preserve | Views of canyon within scenic overlooks | None | Mira Mesa, Unassigned |
| **Mission Beach Community Plan (Adopted 1974, Last Amended 1989)** | | | |
| Views to and along the shoreline of Mission Beach | Ocean views | None | Mission Bay |
| **Mission Valley Community Plan (Adopted 2019)** | | | |
| Communitywide | Views should be provided from public streets into the river corridor | None | Henry, Kearny, San Diego |

| Identified Vantage Point | Viewshed | District Facilities Potentially Within Viewshed | Clusters within CPA Boundaries |
|---|---|---|---|
| I-8 between Mission Gorge Road and Taylor Street/Hotel Circle Place | Views of southern slopes of the Hillside Subdistrict | None | Henry, Kearny, San Diego |
| Communitywide | Aerial views from the hillsides into the river area from public areas such as parks and roads in surrounding communities | None | Henry, Kearny, San Diego |
| **Mid-City Community Plan** (includes neighborhoods of City Heights, Eastern Area, Kensington Talmadge, and Normal Heights) **(Adopted 1998, Last amended 2015)** | | | |
| Communitywide | Framed views of existing aesthetic resources such as parks and community landmarks | Fay Elementary | Crawford, Henry, Hoover, Lincoln |
| Communitywide | Panoramic views of the bay, open spaces, and mountains from street rights-of-way and other public areas | None | Crawford, Henry, Hoover, Lincoln |
| **Navajo Community Plan (Adopted 1982, Last amended 2015)** | | | |
| San Diego River Pathway | Views of the San Diego River | None | Henry |
| **North City Future Urbanizing Area (Adopted 1992, Last amended 2014)** | | | |
| Not in Program area | | | |
| **North Park Community Plan (Adopted 2016)** | | | |
| Western and southern viewsheds along all streets abutting Balboa Park | Balboa Park | None | San Diego |
| Northern viewshed at Adams Avenue overpass (at Texas Street) | Canyon views with Mission Valley in background | None | San Diego |
| Northwestern viewshed at Panorama Drive, north of Adams Avenue | Canyon views | None | San Diego |
| Northern viewshed at end of Vista Place | Canyon views with Mission Valley in background | None | San Diego |
| Eastern views along Boundary Street at Suncrest Drive and Adams Avenue | Views of I-805 valley | None | San Diego |
| Eastern/southeastern viewsheds along eastern boundary of community plan area between Myrtle Avenue and Maple Street | Views of I-805 valley | None | San Diego |
| Multiple viewsheds from streets immediately adjacent to Juniper Canyon | Juniper Canyon | None | San Diego |

| Identified Vantage Point | Viewshed | District Facilities Potentially Within Viewshed | Clusters within CPA Boundaries |
|---|---|---|---|
| Multiple viewsheds from streets immediately adjacent to Switzer Canyon | Switzer Canyon | None | San Diego |
| Southern viewsheds at the southern boundary of community plan area | Views of Cedar Ridge Park canyon | None | San Diego |
| **Ocean Beach Community Plan (Adopted 2015)** | | | |
| Panoramic scenic outlook at Spicey Street at Brighton Avenue | Pacific Ocean, San Diego River | None | Point Loma |
| Western view cones identified at western terminuses of all roads between Newport Avenue and Adair Street | Pacific Ocean | None | Point Loma |
| Western framed view corridors at intersection of Froude Street and all roads from Voltaire Street to Adair Street | Pacific Ocean | Ocean Beach Elementary | Point Loma |
| **Old Town San Diego Community Plan (Adopted 2018)** | | | |
| Presidio Park | San Diego Bay, Mission Bay, Pacific Ocean | None | San Diego |
| **Otay Mesa Community Plan (Adopted 2014, Last Amended 2017)** | | | |
| Not in Program area | | | |
| **Otay Mesa-Nestor Community Plan (Adopted 1996, Last Amended 2014)** | | | |
| Not in Program area | | | |
| **Pacific Beach Community Plan (Adopted 1989, Last Amended 2011)** | | | |
| Southwestern views from Agate Street | Pacific Ocean | None | Mission Bay |
| Western views from segments of Mission Boulevard | Pacific Ocean | None | Mission Bay |
| Western view corridor along Garnet Avenue | Pacific Ocean | None | Mission Bay |
| Southern view corridor along Lamont Street | Mission Bay | None | Mission Bay |
| Southern views along Pacific Beach Drive | Sail Bay | None | Mission Bay |
| Southern views along Grand Avenue | Mission Bay | Mission Bay High School | Mission Bay |
| Southwestern views from Pacific Beach Drive and Lamont Street | Mission Bay | None | Mission Bay |
| **Pacific Highlands Ranch (Adopted 1995)** | | | |
| Not in Program area | | | |

| Identified Vantage Point | Viewshed | District Facilities Potentially Within Viewshed | Clusters within CPA Boundaries |
|---|---|---|---|
| **Peninsula (Adopted 1987, Last Amended 2011)** | | | |
| Cabrillo Memorial Drive | East and west view of Pacific Ocean | None | Point Loma |
| Shelter Island Drive | Bay and downtown view facing north, west and south | None | Point Loma |
| Eastern views from Talbot Street | San Diego Bay | Cabrillo Elementary | Point Loma |
| Southeastern views from Canon Street | San Diego Bay | Cabrillo Elementary | Point Loma |
| Southeastern views from Garrison Street | San Diego Bay | Dana Middle | Point Loma |
| Northeastern views from Chatsworth | Eastern mountains | Dana Middle | Point Loma |
| Southern views from Famosa Boulevard | Famosa Slough | Correia Middle | Point Loma |
| Northwestern views from Santa Barbara Street | Pacific Ocean | Ocean Beach Elementary | Point Loma |
| Northwestern views from Point Loma Avenue | Pacific Ocean | None | Point Loma |
| Western views from Sunset Cliffs Boulevard | Coastal vistas | None | Point Loma |
| Sunset Cliffs Shoreline Park | Pacific Ocean | None | Point Loma |
| **Rancho Bernardo Community Plan (Adopted 1978, Last Amended 2016)** | | | |
| Not in Program area | | | |
| **Rancho Encantada Precise Plan (Adopted 2011)** | | | |
| Not in Program area | | | |
| **Rancho Penasquitos Community Plan (Adopted 1993, Last Amended 2011)** | | | |
| Not in Program area | | | |
| **Sabre Springs Community Plan (Adopted 1982, Last Amended 1998)** | | | |
| Not in Program area | | | |
| **San Pasqual Valley Community Plan (Adopted 1995, Last Amended 2005)** | | | |
| Not in Program area | | | |
| **San Ysidro Community Plan (Adopted 2016, Last Amended 2017)** | | | |
| Not in Program area | | | |
| **Scripps Miramar Ranch (Adopted 1978, Last Amended 2018)** | | | |
| Miramar Reservoir | Public viewpoints overlooking the reservoir | None | Scripps Ranch |
| Pomerado Road | Overlooking Carroll Canyon | Marshall Middle School | Scripps Ranch |

| Identified Vantage Point | Viewshed | District Facilities Potentially Within Viewshed | Clusters within CPA Boundaries |
|---|---|---|---|
| **Serra Mesa Community Plan (Adopted 1977, Last Amended 2017)** | | | |
| No views identified in current community plan | N/A | None | Kearny |
| **Skyline-Paradise Hills Community Plan (Adopted 1987, Last Amended 2009)** | | | |
| Communitywide | Views of undeveloped hillsides, canyons, and eastern mountains | Perry Elementary, Morse High School | Morse |
| **Southeastern San Diego Community Plan (Adopted 2015, Last amended 2016)** | | | |
| Western views from 25th and Market Streets | Panoramic views of downtown San Diego | None | San Diego |
| Western/southwestern views from Grant Hill Park | Panoramic views of downtown San Diego and San Diego Bay | Sherman Elementary | San Diego |
| Northwestern to Northeastern views from Imperial Avenue near S. 38th Street | Mount Hope Cemetery | None | Lincoln, San Diego |
| Northwestern to Northeastern views from Imperial Avenue between 40th and 45th Streets | Greenwood Cemetery | None | Lincoln, San Diego |
| Northern and southern views from Imperial Avenue near 44th Street | Chollas Creek | None | Lincoln |
| Eastern views from Ocean View Blvd, near 29th Street, north of Memorial Community Park | Eastern mountains | Logan Elementary | San Diego |
| Eastern views along Boston Ave from near 38th Street | Eastern mountains | None | Lincoln |
| **Tierrasanta Community Plan (Adopted 1982, Last Amended 2011)** | | | |
| Communitywide | Public views toward open space including Mission Trails Regional Park and Admiral Baker Field | None | Henry, Serra |
| **Tijuana River Valley Community Plan (Adopted 1976, Last Amended 1999)** | | | |
| Not in Program area | | | |
| **Torrey Highlands Subarea Plan (Adopted 1996, Last Amended 2004)** | | | |
| Not in Program area | | | |

| Identified Vantage Point | Viewshed | District Facilities Potentially Within Viewshed | Clusters within CPA Boundaries |
|---|---|---|---|
| **Torrey Hills Community Plan (Adopted 1997, Last Amended 2014)** | | | |
| Not in Program area | | | |
| **Torrey Pines Community Plan (Adopted 1975, Last Amended 2014)** | | | |
| Not in Program area | | | |
| **University Community Plan (Adopted 1986, Last Amended 2018)** | | | |
| Communitywide | Visual access to open space areas from public roadways | None | University City |
| **Uptown Community Plan (Adopted 2016, Last Amended 2018)** | | | |
| Northwestern views along Juan Street near Harney Street | Old Town | None | San Diego |
| Northern views along Bachman Place, north of Arbor Drive | Open space canyon, Mission Valley | None | San Diego |
| Northern viewsheds at northern terminuses of roads between Rhode Island Street through Cleveland Avenue | Panoramic views of Mission Valley | None | San Diego |
| Northeastern viewshed from Old Trolley Barn Park | Panoramic views of Mission Valley | None | San Diego |
| Southwester viewshed on Washington Street | Canyon, open space views | Grant Elementary | San Diego |
| Western viewshed along Union Street, near West Upas Street, West Quince Street, and West Palm Street | San Diego Bay (through the airport) | None | San Diego |
| Western viewshed along Laurel Street near Curlew Street | San Diego Bay (through the airport) | None | San Diego |
| Southwestern view at Quince and 4th Streets | Maple Canyon | None | San Diego |
| Eastern view corridors along 5th Avenue at Upas, Quince, Laurel, Juniper, Hawthorn, and Grape Streets | Balboa Park | None | San Diego |
| **Via de la Valle Community Plan (Adopted 1984, Last Amended 1996)** | | | |
| Not in Program area | | | |

Source: City of San Diego 2019.

### 4.1.2.3 Scenic Highways

There are several officially designated scenic highways protected by the California Scenic Highway Program, administered by the California Department of Transportation (Caltrans), within the Program area. Designated scenic highways are located in areas of outstanding natural beauty and are provided with special conservation treatment to keep the natural views protected. The San Diego region also contains several highways identified by the program as eligible scenic highways, meaning that the highway is considered a scenic resource, but the local jurisdiction has not adopted a scenic corridor protection program or applied to Caltrans for official designation. Officially designated scenic highways in or near the Program area include:

- SR-52 from Santo Road to Mast Boulevard
- SR-75 San Diego-Coronado Bay Bridge
- SR-163 through Balboa Park

Eligible scenic highways in or near the Program area include:

- I-5 in San Diego from opposite Coronado to near San Juan Capistrano
- SR-52 from east of La Jolla to SR-67 near Santee
- SR-163 from Ash Street to I-8
- SR-209 in Point Loma (entire length)
- I-8 from Sunset Cliffs Blvd to SR-98 near Coyote Wells

No existing District facilities are visible from the designated scenic highways listed above. While Perkins Elementary falls within the viewshed available from SR-75 San Diego-Coronado Bay Bridge, the buildings of the school are not discernible from the surrounding development. In addition, the bridge is only open to motor vehicles, there are no pullouts for viewing, and stopping on the bridge is prohibited by law. Also, the bridge has a speed limit of 50 miles per hour and a concrete guardrail that limits the view in lower-profile vehicles.

Some District facilities may be visible from eligible scenic highways, including facilities adjacent to I-5 through downtown and Old Town (King Chavez Academy of Excellence, Burbank Elementary, Garfield High School, San Diego High School, East Village High School, or Washington Elementary) or facilities adjacent to SR-209 through Point Loma (Dewey Elementary School). However, there are no existing facilities within the viewsheds of the other eligible scenic highways listed above.

### 4.1.2.4 Visual Character and Quality

While the individual visual character of each cluster may vary somewhat, San Diego is a highly urbanized and built-out city with few remaining undeveloped areas within city limits. Most of the neighborhoods in the city include a relatively dense pattern of residential development, both single-family and multi-family homes, clustered atop mesas and divided by canyons and/or major transportation routes, such as the interstate freeways or state highways. The visual character of downtown San Diego varies from this development pattern because the built environment comprises a highly concentrated collection of mid- to high-rise office and residential buildings and hotels abutting the mostly visitor-serving and maritime industrial uses along the Bayfront.

# 4.1.2.5 Light and Glare

## Existing Ambient Light and Glare Conditions

There are two typical types of light intrusion. First, light that emanates from the interior of structures and passes out through windows. Second, light that projects from exterior sources, such as street, security, and landscape lighting. Light spillover is typically defined as the presence of unwanted or misdirected light on properties adjacent to the property being illuminated. Light spillover can be a nuisance in adjacent areas and diminish views of the clear night sky.

Glare is described as the distraction, discomfort, or impairment of vision caused by extreme contrasts in the field of vision where light sources, such as sunlight, lamps, luminaries, or reflecting surfaces, are excessively bright in relation to the general brightness of the surroundings. Glare also results from sunlight reflecting off flat building surfaces, with glass typically contributing the highest degree of reflectivity.

### Lighting

Existing sources of nighttime lighting at most District facilities comprise outdoor building or parking lot lighting for safety and security. In addition, many of the high schools include stadium lighting for their outdoor recreational fields (i.e., sports fields).

Related to sources of ambient lighting, as noted above, the Program area is within an urbanized setting that supports a mixture of commercial, industrial, recreational, residential, civic, and marine-related uses. The existing nighttime lighting environment surrounding District facilities consists mainly of ambient light produced by recreational facilities, interior and exterior building (residential, office, and commercial) lighting, highly ordered/structured lighting from streetlights, and transitory lighting from headlights on automobiles and transit-related (i.e., buses and trolleys) vehicles. Because the area is highly urbanized, existing ambient lighting levels are considered to be high.

### Glare

Existing District facilities are generally not a substantial source of glare because most of the facilities are not constructed out of glass or other materials that produce glare. Sources of glare would largely be limited to reflections off parked cars and, at some sites, solar panels mounted atop buildings or over parking lots.

Offsite glare conditions, which are not as prevalent as nighttime lighting, are generally moderate in the area surrounding District facilities. The most noticeable sources of glare are the numerous mid- and high-rise hotels and commercial or residential developments downtown, the San Diego Bay, Mission Bay, and the Pacific Ocean or other larger bodies of water within the Program area (such as Lake Miramar, Lake Murray, or Chollas Reservoir). Overall, existing daytime glare conditions are considered to be moderate.

# 4.1.3 Applicable Laws and Regulations

## 4.1.3.1 State

### California Scenic Highway Program

Caltrans manages the California Scenic Highway Program, which was created in 1963 by the California Legislature to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. The program includes a list of highways that are eligible for designation as scenic highways or that have been designated as such. The designation of a highway as scenic is based on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes on the travelers' enjoyment of the view. State laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 263.

### California Energy Code

The California Energy Code (24 California Code of Regulations Part 6) creates standards to reduce energy consumption. The types of luminaries and the allowable wattage of certain outdoor lighting applications are regulated. Specifically, Section 110.9 provides mandatory requirements for lighting control devices and systems, ballasts, and luminaires.

## 4.1.3.2 Local

### San Diego Unified School District *Standard Design Guide,* Educational Specifications, Guide Specifications, and Landscape Guide

#### Standard Design Guide

The District *Standard Design Guide* is one of several documents developed by the District to assist design professionals in providing the District with the following.

- A consistent and predictable level of quality in the design of school facilities:
    - To protect the health, safety, and welfare of the public and the environment.
    - To develop characteristics of a school campus which have a positive impact, not only on the learning environment, but also on neighboring properties, and the community as a whole.
    - To convey to design professionals "lessons learned" by the District through years of experience.
    - To develop facilities that provide the optimal expenditure of District resources, considering first cost, functional criteria, maintenance, energy usage, and operating costs.

The overall purpose of the *Standard Design Guide* is as follows:

- Communicate to design professionals and District staff which systems, products and materials have proven to work well in previous facilities, and which the District expects will provide long life, low maintenance, and minimal energy consumption.

- Standardize the application of systems and materials to provide a uniformity in facility quality throughout the District.
- Provide guidance in the selection of systems and materials in order to minimize maintenance, reduce energy expenditure, and improve levels of indoor air quality.

This *Standard Design Guide* is complementary to the District's Educational Specifications and Guide Specifications, which are described below.

## Educational Specifications

The Educational Specifications were developed with the intent of providing guidance to design professionals and District staff in school facility planning; identifying the types of spaces required, relationships, functional requirements, and equipment and furnishings required; and listing support services and level of finishes required in each space. As they relate to aesthetic resources, the Educational Specifications state, in the general design considerations, that District schools serve as a community asset and a place that is physically and visually inviting and welcoming for students, community members, and visitors, and stipulate that the indoor and outdoor structures and spaces of the school should be aesthetically pleasing, healthy environments. Under the *Educational Programs and Instructional Strategies* section, the Educational Specifications identify the following guiding principle related to aesthetics for the planning and design phases of District facilities–related projects:

- Learning environmental should be community connected
    - Be accessible and welcoming
    - Respect the fabric and culture of the respective neighborhood
    - Have productive and informal gathering spaces
    - Be a place of community "experience"
    - Be safe and comfortable

## Guide Specifications

- Provide design professionals with a uniform basis for developing project-specific specifications that reinforce the District's commitment to high quality facilities.
- List specific materials, products, systems and components that reflect those that have been used successfully in District facilities.

## Landscape Guide

Section G2050, *Landscaping*, of the District's *Standard Design Guide*, establishes the goals and objectives related to implementation of landscaping at District facilities. The design concepts of the guide state that landscaping should be used to blend the transition zone between a school campus and the surrounding neighborhood, including the use of shrubs and vines to screen walls and utility areas and the use of the same street trees found in the neighborhood, if appropriate. In addition, trees, shrubs, and groundcover should be used to screen parking lots and visually reduce the large expanse of asphalt as well as provide shade.

### District Administrative Regulation 3511(a)

District Administrative Regulation (AR) 3511 outlines the operational energy and water management policies for District facilities to reduce water and energy resource use. Specifically, the following district operational policies related to lighting are incorporated into the district's resource management program:

a. All unnecessary lighting in unoccupied areas will be turned off even when lighting motion sensors are in place. Staff should make certain that lights are turned off when leaving the classroom or office when exiting the classroom or office. Use only natural lighting where sufficient.

b. All outside lighting shall be off during daylight hours.

c. Gym lights, stage and multipurpose rooms shall not be left on unless the space is being occupied.

d. All lights shall be turned off when students and staff leave for the day. Custodians will turn on lights only in the areas in which they are working.

e. Refrain from turning lights on unless needed. Remember that lights not only consume electricity, but also give off heat that places an additional load on the air conditioning equipment and, thereby, increases the use of electricity to cool the room.

## City of San Diego General Plan – Urban Design Element

The City of San Diego prepared an Urban Design Element as part of its General Plan to guide physical development toward a desired scale and character that is consistent with the social, economic, and aesthetic values of the City (2008). Urban design describes the physical features that define the character or image of a street, neighborhood, community, or the city as a whole. Urban design is the visual and sensory relationship between people and the built and natural environments.

The Urban Design Element includes general goals and policies for development and redevelopment within the city. These goals and policies include: maintain an improved quality of life through safe and secure neighborhoods and public places; preserve and protect natural landforms and features; design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context; and provide lighting from a variety of sources at appropriate intensities and qualities for safety.

## City of San Diego Municipal Code

### Lighting Regulations

Lighting within the city is controlled by the City's Outdoor Lighting Regulations per Section 142.0740 of the Municipal Code. The Outdoor Lighting Regulations are intended to provide public safety, conserve energy, and protect surrounding land uses as well as astronomy activities at the Palomar and Mount Laguna Observatories from excessive light generated by new development. The project is not within 30 miles of the Palomar and Mount Laguna Observatories; therefore, regulations pertaining to these observatories are not applicable.

### Glare Regulations

Glare within the city is controlled by Municipal Code Section 142.0730 (Glare Regulations). The City's Glare Regulations include the following:

- A maximum of 50 percent of the exterior of a building may be composed of reflective material that has a light-reflectivity factor greater than 30 percent (Section 142.0730 (a)).
- Reflective building materials shall not be permitted where the City Manager determines that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space (Section 142.0730 (b)).

### Noise Regulations

Construction noise within the city of San Diego is governed by the City's Municipal Code Section 59.5.0404, the relevant parts of which are cited below. The noise regulations are applicable to aesthetics as they dictate construction hours and would determine the need for construction lighting.

(a) It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator…

(b) … it shall be unlawful for any person, including The City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12–hour period from 7:00 a.m. to 7:00 p.m.

Operational noise within the city of San Diego is governed by the City's Municipal Code Section 59.5.0401, which established the allowable noise limits at the property boundaries for different land use zones. The relevant parts are cited below.

(a) It shall be unlawful for any person to cause noise by any means to the extent that the one–hour average sound level exceeds the applicable limit given in the following table, at any location in the City of San Diego on or beyond the boundaries of the property on which the noise is produced. The noise subject to these limits is that part of the total noise at the specified location that is due solely to the action of said person.

(b) The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts.

# 4.1.4 Impact Analysis

## 4.1.4.1 Methodology

Aesthetic experiences can be highly subjective and vary from person to person; therefore, when feasible, it is preferable to evaluate aesthetic resources using a process that strives to objectively identify the visual features of the area and their importance, and the sensitivity of the associated viewers. Potential changes to the aesthetic resources or visual character related to the types of projects that could occur with implementation of the Proposed Program are identified and qualitatively evaluated based on the potential extent of the modification to the existing physical conditions and based largely on viewer sensitivity to the modification.

Viewer sensitivity is based on the visibility of a scenic resource, the proximity of viewers to the resource, the relative elevation of viewers to the resource, the frequency and duration of views, the

number of viewers, and the types and expectations of the individuals and viewer groups. Generally, visual sensitivity increases as the total number of viewers, frequency, and duration of viewing activities increases.

The degree of visual sensitivity is treated as occurring at one of the following four levels.

- **High Sensitivity** suggests that the majority of the public is likely to react strongly to a threat to visual quality. A highly concerned public is assumed to be more aware of any given level of adverse change and is substantially less tolerant than a public that has little to moderate concern. A small modification of the existing landscape may be visually distracting to a highly sensitive public and represent a substantial reduction in visual quality.
- **Moderate Sensitivity** suggests that the public would probably voice concern over substantial visual impacts. Often, the affected views are secondary in importance or are similar to others commonly available to the public.
- **Low Sensitivity** is considered to prevail where the public is expected generally to have little concern about adverse changes in the landscape, or only a small minority may be expected to voice such concern, even where the adverse change is substantial in intensity and duration.
- **No Sensitivity** occurs when the views are not public, or there are no indications of public concern over, or interest in, scenic/visual resource impacts on the affected area.

Proposed Program–related changes are evaluated using the threshold criteria discussed in Section 4.1.4.2, *Thresholds of Significance*, to determine significance. It should be noted that views from private property are not considered a protected resource by the District.

It is important to note that, per Government Code 54094, the City's General Plan policies and zoning code provisions would not be applicable to school sites. District properties that would be required to comply with City policies and ordinances include non-educational facilities such as administrative facilities.

## 4.1.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining the significance of impacts associated with aesthetics and visual quality resulting from the implementation of the Proposed Program. The determination of whether an aesthetics and visual quality impact would be significant is based on the thresholds described below and the professional judgment of the District as Lead Agency and the recommendations of qualified personnel at ICF, all of which is based on the evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following.

1. Have a substantial adverse effect on a scenic vista.
2. Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
3. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, conflict with applicable zoning or other regulations governing scenic quality.

4. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

# 4.1.4.3 Impacts and Mitigation Measures

***Threshold 1: Would the Proposed Program have a substantial adverse effect on a scenic vista?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

***Construction***

New acquisition of property would be an administrative procedure and would not directly result in any physical changes to the environment. However, once the site has been acquired, the construction of a new school or administrative facility on that site may result in physical changes that could have significant environmental effects. As shown in Table 4.1-2, several existing District facilities are potentially located within the viewsheds of designated scenic vantage points. In addition, the City of San Diego is currently involved in the process of updating many community plans, and new scenic vistas not identified in Table 4.1-2 may be designated as part of that process. Future development occurring under the Proposed Program, including construction of new schools, charter schools, or administrative facilities, would have the potential to be located within the viewsheds of designated scenic vistas.

Within these areas, construction activities associated with new school or administrative facilities may introduce incompatible elements into a scenic vista such as substantial grading activities and heavy construction equipment, such as haul trucks, cranes, and excavators, that would be present for multiple years. Grading activities in particular tend to be highly visible even from a distance during construction activities because of the usually large parcels required for a school or administrative facility that would result in a wide area of exposed soil and lack of vegetation, which can create a strong contrast with the more muted tones of the surrounding landscaping and development. Should these construction-related elements intrude into or be prominently visible within an important scenic vista, this would result in a detraction or interference with a designated scenic vista. While intrusion of construction activities and equipment into a scenic vista would be temporary, these activities have the potential to result in a substantial adverse impact on a scenic vista (**Impact-AES-1**). Implementation of **MM-AES-1**, which requires installation of construction screening and fencing, would help reduce the visibility of construction activities within the viewshed of a scenic vista because it would shield grading activities and most construction equipment from view. However, because the prominence of any newly acquired site and the extent of construction activities within a scenic viewshed are not known at this time, it cannot be concluded that **MM-AES-1** would be able to completely mitigate this impact to less-than-significant levels. Therefore, **Impact-AES-1** would remain significant and unavoidable.

***Operation***

Many existing District facilities are generally located on relatively flat parcels and are surrounded by existing development—usually residential neighborhoods and/or neighborhood commercial development. While they may fall within the viewsheds of a scenic vantage point located at higher elevation, given the flat topography of the sites, the low-profile nature of the District's school or administrative buildings, and the relatively dense development pattern that generally exists throughout San Diego, existing District facilities do not tend to stand out as an encroaching element within these viewsheds, nor do they result in blocking scenic views. While the existing District facilities may be noticeable within the viewshed because of features such as buildings with greater height or massing (e.g., multi-purpose auditorium/gymnasiums) compared to the surrounding development, or the presence of large sports fields (such as a football stadium), a school facility is an expected component within a viewshed of a residential neighborhood.

These factors would be true for new facilities constructed as part of new site acquisitions, as well. However, some existing District facilities are within hillier areas of the city (such as within Mission Bay, Point Loma, Golden Hill, or the Mount Soledad portions of La Jolla) and in areas with high scenic quality and viewer sensitivity. New construction associated with site acquisitions may involve infill development on flat parcels, which would have a low potential to affect existing scenic vistas, while others may be in hillier areas or areas with high scenic quality and viewer sensitivity. These projects have the potential to place new buildings on a site through which views are currently available or could involve structures with greater height or massing than the surrounding development such that intrusion into a viewshed would result. Per the *Standard Design Guide* and the Educational Specifications (see Section 4.1.3.2), the District would take the surrounding context of a project site into consideration during the planning and design stages for new structures, including whether the project site falls within the viewshed of a designated scenic vista. However, given that the location for new school or administrative facilities is currently unknown, it would still be possible for new structures to result in an adverse effect on a scenic vista. Therefore, new structures within the viewshed of a scenic vista would have the potential to substantially intrude into or substantially detract from a scenic vista, which would result in a significant impact (**Impact-AES-2**).

Implementation of **MM-AES-2** would reduce impacts on scenic vistas from development of a new school or administrative facility because it would ensure that new school facilities or administrative facilities would be designed to avoid placing visibly prominent features within the viewshed of a scenic vista or would minimize the presence of visually prominent features through building design, finishing materials, or landscaping. However, specific sites and site plans are not known at this time, and because site constraints or project specifications may reduce flexibility related to site plans or building design, even with mitigation, the potential still exists for new school or administrative facilities to adversely affect a scenic vista. Therefore, **Impact-AES-2** would remain significant and unavoidable.

**Level of Significance Prior to Mitigation**

***Construction***

**Impact-AES-1: Potential to Result in Adverse Effects on Views Within a Vista Area During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities, including large areas of graded land or the presence of large construction equipment such as cranes or scaffolding for multiple years within a scenic vista, could

result in a temporary substantial adverse impact on a scenic vista. This is a potentially significant impact.

***Operation***

**Impact-AES-2: Potential to Result in Adverse Effects on Views Within a Vista Area During Operation of New School or Administration Facilities.** Development of new school or administrative facilities could introduce structures within a designated scenic vista that result in substantial interference with or blockage of a designated scenic vista. This is a potentially significant impact.

### Mitigation Measures

For **Impact-AES-1**:

**MM-AES-1: Install Construction Screening and Fencing.** In compliance with District Guide Specification Section 01-50-00, Temporary Facilities and Controls, the District shall install construction-screening fencing around the entire perimeter of a project site during construction of a new school, administrative facility, or a whole site modernization that would shield construction activities from sight and, prior to the onset of construction activities, the District shall confirm such fencing is depicted on the appropriate demolition and construction plans. Construction screening shall meet the specifications defined in Part 2 of Section 01-50-00.

For **Impact-AES-2:**

**MM-AES-2**: **Minimize Intrusions into the Viewshed from New School or Administrative Facilities.** Prior to the preparation of a site plan and building design for a new school or administrative facility, the District shall determine if the site falls within the viewshed of a scenic vista designated in the City of San Diego community plans or any other plan applicable to the project site. If the site falls within a designated scenic vista, the District shall use site planning and building design to minimize the development's prominence within the viewshed to the greatest extent feasible. Measures could include, but are not limited to, the following:

- Position highly visible features that have the potential to block or detract from the scenic vista (e.g., taller or larger buildings, parking lots) out of, or orient that component in such a way as to minimize their prominence within, the viewshed.
- If possible, place heating, ventilation, and air conditioning (HVAC) equipment on the ground and/or shield it with equipment sheds/roof screens.
- Choose finishing materials for buildings or other site components, such as HVAC equipment sheds/roof screens or fencing, including paint colors, that blend with and do not detract from the surrounding structures or natural vegetation.
- Use landscaping elements to minimize the visual prominence of project components within the viewshed.

The District shall consider the site plan and building design as well as any residual impacts prior to approval of any specific project.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-AES-1** would help reduce the visibility of construction activities within the viewshed of a scenic vista because it would shield grading activities and most construction equipment from view. However, because the prominence of any newly acquired site and the extent of construction activities within a scenic viewshed are not known at this time, it cannot be concluded that **MM-AES-1** would be able to completely mitigate this impact to less-than-significant levels. Therefore, **Impact-AES-1** would remain significant and unavoidable.

#### *Operation*

Implementation of **MM-AES-2** would reduce impacts on scenic vistas from development of a new school or administrative facility because it would ensure that new school or administrative facilities would be designed to avoid placing visibly prominent features within the viewshed of a scenic vista or would minimize through building design, finishing materials, or landscaping the presence of visually prominent features. However, specific sites and site plans are not known at this time, and because site constraints or project specifications may reduce flexibility related to site plans or building design, even with mitigation, the potential still exists for new school or administrative facilities to adversely affect a scenic vista. Therefore, **Impact-AES-2** would remain significant and unavoidable.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

Whole site modernization would involve varying types and intensities of construction activities, including the demolition of existing buildings and construction of new replacement buildings as well as improvements to athletic facilities, such as new or reconfigured athletic fields and gymnasiums. Construction activities associated with District facility improvement projects would potentially involve the presence of heavy construction equipment, such as haul trucks, cranes, and excavators, that would be present for multiple years within the viewshed of a designated scenic vista. This would result in a temporary adverse impact on a scenic vista, similar to construction activities related to new site acquisitions and new school or administrative facility construction (**Impact-AES-3**). Implementation of **MM-AES-1**, which requires installation of construction screening and fencing, would help reduce the visibility of construction activities within the viewshed of a scenic vista because it would shield grading activities and most construction equipment from view. However, because the prominence of the project site and the extent of construction activities within a scenic viewshed are not known at this time, it cannot be concluded that **MM-AES-1** would be able to completely mitigate this impact to less-than-significant levels. Therefore, **Impact-AES-3** would remain significant and unavoidable.

#### *Operation*

Whole site modernization would occur at existing school sites and, as indicated in Table 4.1-2, above, many of these sites fall within the viewsheds of existing designated scenic vistas. Whole site modernizations could involve the reconstruction of buildings that involve greater height or bulk,

which have the potential to detract from or substantially interfere with a designated scenic vista. Per the District's *Standard Design Guide* and the Educational Specifications (see Section 4.1.3.2), the District would take the surrounding context of a project site into consideration during the planning and design stages for new structures, including whether the project site falls within the viewshed of a designated scenic vista as indicated on Table 4.1-2. If a proposed whole site modernization does not include improvements that would increase building heights or massing, or involve any other features that would increase the overall height of the structures at an existing school campus, then impacts associated with whole site modernizations would be less than significant. However, if building height or massing increases with new additions or other new features, the potential for a whole site modernization project to substantially affect an existing or future designated scenic vista would result in a significant impact (**Impact-AES-4**). In combination with the District's *Standard Design Guide* and Educational Specifications, implementation of **MM-AES-3** would minimize the prominence of new development within a scenic vista and reduce impacts on scenic vistas related to Whole site modernization projects (**Impact-AES-4**). However, site plans are not known at this time, and because site constraints or project specifications may reduce flexibility related to building design the potential still exists for whole site modernization projects to adversely affect a scenic vista even with mitigation. Therefore, **Impact-AES-4** would remain significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-AES-3: Potential to Result in Adverse Effects on Views Within a Vista Area During Construction of Whole Site Modernizations.** Construction activities associated with whole site modernization projects, including large areas of graded land or the presence of large construction equipment such as cranes or scaffolding, could result in a temporary substantial adverse impact on a scenic vista. This is a potentially significant impact.

#### *Operation*

**Impact-AES-4: Potential to Result in Adverse Effects on Views Within a Vista Area During Operation of Existing District Sites and Facilities.** Redevelopment or renovation of existing structures associated with whole site modernization projects, upgrades of existing school and administrative sites, or new development associated with joint-use facilities could result in substantial interference with or blockage of a designated scenic vista. This is a potentially significant impact.

### Mitigation Measures

For **Impact-AES-3**:

Implement **MM-AES-1**, as described above.

For **Impact-AES-4**:

**MM-AES-3**: **Prepare Visual Simulations to Evaluate the Project's Potential to Affect Scenic Vistas and Minimize Intrusions into the Viewshed at Existing District Facilities.** If subsequent projects occurring under implementation of the Proposed Program at existing District sites or facilities are identified on Table 4.1-2 as falling within the viewshed of a scenic vista designated in the City of San Diego community plans and would involve an overall increase

in building height or massing as part of the improvements (including the addition of rooftop features), the District shall conduct a site survey to determine the prominence of the site and its existing structures within the context of the designated scenic vista, taking into consideration the topography and intervening obstructions (other buildings, vegetation, etc.). If the results of the visual site survey conclude the potential for improvements to intrude into or potentially block a scenic vista, the District shall prepare visual simulations during subsequent CEQA evaluations to analyze the potential for any project components to intrude into the viewshed of a designated scenic vista. If a potential impact on a scenic vista is determined to occur, the District shall minimize the impact to the greatest extent feasible. Measures could include, but are not limited to, the following:

- Consider scenic vistas during any reconfigurations to an existing campus layout and position highly visible features that have the potential to block or detract from the scenic vista (e.g., taller or larger buildings, parking lots) out of, or orient that component in such a way as to minimize their prominence within, the viewshed.
- When possible, place heating, ventilation, and air conditioning (HVAC) equipment on the rooftop of single-story buildings or on the ground.
- Choose finishing materials for buildings or other site components, such as HVAC equipment or fencing, including paint colors, that blend with and do not detract from the surrounding structures or natural vegetation.
- Consider the use of native landscaping elements to soften the visual prominence of project components within the viewshed.

The District shall consider these factors as well as any residual impacts prior to the approval of any specific project.

### Level of Significance After Mitigation

#### *Construction*

As noted above, **MM-AES-1** would help reduce impacts related to construction activities, but because the proximity and prominence of construction activities within a scenic vista are not known, it cannot be concluded whether **MM-AES-1** would reduce impacts to less-than-significant levels. Therefore, **Impact-AES-3** would remain significant and unavoidable.

#### *Operation*

In combination with adherence to the District's *Standard Design Guide* and Educational Specifications, implementation of **MM-AES-3** would minimize the prominence of new development within a scenic vista and reduce impacts (**Impact-AES-4**) on scenic vistas related to whole site modernization projects. However, site plans are not known at this time, and because site constraints or project specifications may reduce flexibility related to building design, even with mitigation, the potential still exists for whole site modernization projects to adversely affect a scenic vista. Therefore, **Impact-AES-4** would remain significant and unavoidable.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Upgrades of existing school and administrative sites would include interior modernization of buildings and systems with minimal exterior improvements, which would involve minor construction activities with light equipment and short durations. While these construction activities may occur within the viewshed of a designated scenic vista, construction activities would generally be contained within the site; while construction activities may be visible, they would not result in a substantial intrusion into or interference of a scenic vista. Impacts related to construction activities of existing facility upgrades and maintenance and repair would be less than significant.

#### *Operation*

Upgrades would occur at existing school sites and, as indicated in Table 4.1-2, many of these sites fall within the viewsheds of existing designated scenic vistas. Upgrades of existing school and administrative sites would include interior modernization of buildings and systems with minimal exterior improvements. Generally, these improvements would not have the potential to interfere with an existing or future designated scenic vista. However, these projects could involve elements that could impede into a scenic vista, including the placement of HVAC equipment on rooftops or new fencing around existing District facilities, which have the potential to interfere with a scenic vista and could result in a significant impact on a scenic vista (**Impact-AES-4**). Adherence to the District's *Standard Design Guide* and Educational Specifications and implementation of **MM-AES-3** would reduce impacts on scenic vistas related to upgrades of existing school and administrative sites (**Impact-AES-4**) because it would require consideration of the scenic vista for improvements such as the placement of HVAC equipment and fencing. However, because site constraints or project specifications may reduce flexibility related to placement of HVAC equipment or fencing, the potential still exists for upgrades of existing school and administrative sites to adversely affect a scenic vista even with mitigation. Therefore, this impact would remain significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would not result in substantial adverse impacts on a designated scenic vista. Impacts would be less than significant.

#### *Operation*

**Impact-AES-4: Potential to Result in Adverse Effects on Views Within a Vista Area During Operation of Existing District Sites and Facilities.** Redevelopment or renovation of existing structures associated with whole site modernization projects, upgrades of existing school and administrative sites, or new development associated with joint-use facilities could result in substantial interference with or blockage of a designated scenic vista. This is a potentially significant impact.

### Mitigation Measures

For **Impact-AES-4**:

Implement **MM-AES-3,** as described above.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would not result in substantial adverse impacts on a designated scenic vista. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

#### *Operation*

In combination with adherence to the District's *Standard Design Guide* and Educational Specifications, implementation of **MM-AES-3** would minimize the prominence of new development within a scenic vista and reduce impacts (**Impact-AES-4**) on scenic vistas related to upgrades of existing school and administrative sites. However, specific upgrades are not known at this time, and because site constraints or project specifications may reduce flexibility related to placement of HVAC equipment or fencing, the potential still exists for upgrades of existing school and administrative sites to adversely affect a scenic vista even with mitigation. Therefore, this impact would remain significant and unavoidable.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

Development of joint-use facilities would involve improvements to existing schools and would generally involve low-profile development such as the creation or renovation of sports fields or walking tracks. However, joint-use facilities could also include structures, such as buildings associated with swimming pools (e.g., equipment buildings, concessions stands, restrooms), which could require the use of heavy construction equipment. However, grading activities are expected to be minimal and construction durations would be short. While construction of new swimming pools would require a greater amount of grading activity to achieve the required depth, the overall graded area would be minimal. Therefore, the potential for construction activities associated with joint-use facilities to result in a substantial detraction from or intrusion into a scenic vista would be minimal, and impacts would be less than significant.

#### *Operation*

Development associated with joint-use facilities would generally involve low-profile components such as the creation or renovation of sports fields or walking tracks. However, joint-use facilities could also include structures, including one-story equipment buildings, concessions stands, or bleachers. In general, given the diminutive nature of these structures, they would not be expected to result in substantial intrusion into a scenic vista. However, if they were constructed on a site through which existing views are available or situated within a scenic vista that contains high viewer sensitivity (see Table 4.1-2), a significant impact on a scenic vista could occur (**Impact-AES-**

**4**). Adherence to the District's *Standard Design Guide* and Educational Specifications and implementation of **MM-AES-3** would reduce impacts on scenic vistas related to joint-use facilities because it would require consideration of the scenic vista for new structures that would be built under this category. However, because site constraints or project specifications may reduce flexibility related to placement of structures, such as equipment buildings, bleachers, and concession stands, the potential still exists for joint-use facilities to adversely affect a scenic vista even with mitigation. Therefore, this impact would remain significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with joint-use facilities would not result in substantial adverse impacts on a designated scenic vista. Impacts would be less than significant.

#### *Operation*

**Impact-AES-4: Potential to Result in Adverse Effects on Views within a Vista Area During Operation of Existing District Sites and Facilities.** Redevelopment or renovation of existing structures associated with whole site modernization projects, upgrades of existing school and administrative sites, or new development associated with joint-use facilities could result in substantial interference with or blockage of a designated scenic vista. This is a potentially significant impact.

### Mitigation Measures

For **Impact-AES-4**:

Implement **MM-AES-3,** as described above.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with joint-use facilities would not result in substantial adverse impacts on a designated scenic vista. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

#### *Operation*

In combination with adherence to the District's *Standard Design Guide* and Educational Specifications, implementation of **MM-AES-3** would reduce impacts on scenic vistas related to joint-use facilities (**Impact-AES-4**) because it would require consideration of the scenic vista for new structures that would be built under this category. However, because site constraints or project specifications may reduce flexibility related to placement of any structures, such as equipment buildings, bleachers, and concession stands, the potential still exists for joint-use facilities to adversely affect a scenic vista even with mitigation. Therefore, this impact would remain significant and unavoidable.

# Site-Specific Analysis

## Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.1-3. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the Whole Site Modernization project category, as described further in Chapter 3, *Project Description*.

**Table 4.1-3. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019.

Four of the 21 near-term whole site modernization sites are identified on Table 4.1-2 as potentially falling within scenic vistas. Descriptions of the scenic vistas and the schools' prominence within them are provided below.

- **Correia Middle School.** In the vicinity of Correia Middle School, the Peninsula Community Plan identifies a scenic vista of southern views of the Famosa Slough from Famosa Boulevard. There are two segments of Famosa Boulevard. One segment extends between West Point Loma Boulevard to Camulos Street, and the other extends from Voltaire Street to where it dead ends just past Valeta Street at the Famosa Slough hiking trailhead. Correia Middle School is located at the intersection of Valeta Street and Famosa Boulevard along the second segment of Famosa

Boulevard, approximately 220 feet south from the trailhead. Views of the Famosa Slough are only visible from the segment of Famosa Boulevard extending from West Point Loma Boulevard and views of the school are not visible from this segment of road. In addition, because the school sits up at a higher elevation than Famosa Boulevard, only the fencing that surrounds the northeastern corner is minimally visible from the parking area for the Famosa Slough trailhead. Trees surround the actual trail, and therefore, any improvements occurring at the school would not be visible from the trail that surrounds the Slough. Any improvements occurring at Correria Middle School would not be visible from this designated scenic vista.

- **Perkins K-8.** The Barrio Logan Community Plan identifies views of the downtown skyline and industrial waterfront from Logan or National Avenues as important scenic resources within the community. Perkins K-8 falls on a city block bounded by Newton Avenue to the northeast, Beardsley Street to the southeast, Main Street to the southwest, and Sigsbee Street to the northwest. Both National and Logan avenues are located to the northeast of Perkins K-8, one and three blocks, respectively. Views of the downtown skyline occur straight down these two streets to the northwest and Perkins Elementary is not visible within these viewsheds. Views of the working waterfront from National and Logan avenues are available down Beardsley and Sigsbee streets, which would run adjacent to the school. These views consist of a narrow view corridor down the two-lane streets, which is framed on either side by low-profile residential, commercial or industrial development, cars parked along the side of the roads, and ornamental trees. Waterfront elements visible within these view corridors primarily consist of the taller features of the working waterfront (i.e., cranes, silos, etc.) as well as the San Diego-Coronado Bay Bridge.
- **Perry Elementary.** Perry Elementary is located within the Paradise Hills neighborhood of the Skyline-Paradise Hills Community Plan, which identifies views of undeveloped hillsides, canyons, and the eastern mountains as important visual resources within the community. Views of the eastern mountains are not visible from Perry Elementary due to intervening residential development. The school is just south of an undeveloped canyon located north of Paradise Valley Road and east of Mundo Road. Views of this canyon are not visible from the school or from the roadways surrounding the school (including Oriskany Road, Ridgewood Drive, and Coral Sea Road) due to the school's setback from the edge of the canyon as well as intervening existing development. Views of this canyon are primarily visible from Paradise Valley Road and Mundo Road; however, given the setback from the canyon's edge and two-story residential development that abuts the canyon's edge, the school is not visible from either of these roadways. Therefore, improvements occurring at Perry Elementary would not be visible from nor would obstruct views of this canyon.
- **Valencia Park Elementary.** In the vicinity of Valencia Park Elementary, the Encanto Community Plan identifies public view corridors along Valencia Parkway as it travels up or down through the undeveloped open space of a canyon. Valencia Park Elementary is situated at the top of the hill at the intersection of Valencia Parkway and Skyline Drive. Northward views (traveling downhill along Valencia Parkway) begin just after the ballfields on the northern end of the school property with views looking north away from the school. The southern viewshed, as drivers and pedestrians travel uphill, begins near the bottom of the hill near the intersection with Imperial Avenue. Views look out over the open space toward the southwest with the backstop of the northwestern ballfield at the school becoming somewhat visible as viewers approach the top the of the hill. The rest of the school property becomes visible as viewers near Richeth Road, but the scenic vista is not designated along this segment of the roadway.

Therefore, except for the farther portions of the ballfield that are visible in southwestern views, Only improvements occurring within these areas, such as improvements to the perimeter fencing or ballfields, Valencia Park Elementary would be visible within the Valencia Parkway viewsheds.

Based on the above, construction and operational activities at Perkins K-8 and Valencia Park Elementary have the potential to be visible within the viewshed of a designated scenic vista, which is discussed below. Construction and operation of any improvements at Correia Middle School and Perry Elementary would not be visible from a designated scenic vista, and construction and operation impacts related to whole site modernizations at those schools would be less than significant on scenic vistas.

#### Construction

Construction activities for a whole site modernization could involve demolition and reconstruction of existing structures or improvements to athletic fields, etc., which could involve the presence of large construction equipment, including cranes, at the project site as well as major grading. At both Perkins K-8 and Valencia Park Elementary schools these improvements would be contained within the project site and would not extend into the adjacent properties or roadways. At Perkins K-8, the view corridors are limited to the width of the existing roadways, and because construction activities would not extend into this area, construction activities at Perkins K-8 would not obstruct or substantially interfere with a designated scenic vista. Similarly, at Valencia Park Elementary, while construction activities may be visible adjacent to views of the undeveloped hillsides of the canyon, they would not obstruct or interfere with views from Valencia Parkway of this scenic resource. Therefore, impacts associated with construction activities for the whole site modernizations at Perkins K-8 and Valencia Park Elementary would be less than significant.

#### Operation

Operation of the whole site modernization projects at Perkins K-8 and Valencia Park Elementary schools may involve taller or larger structures than what currently exist at the project site. However, as noted above, the viewsheds of the scenic vistas are adjacent to, and not through, these project sites. Therefore, while taller or larger buildings or other structures may be visible adjacent to the viewsheds, they would not block nor obstruct views from the designated scenic vistas. Impacts would be less than significant.

## Level of Significance Prior to Mitigation

Whole site modernization projects occurring at the 21 near-term project sites would result in less-than-significant impacts on scenic vistas.

## Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### Construction

Construction activities associated with the near-term, site-specific whole site modernization projects would not substantially block or interfere with views from a designated scenic vista. Impacts were determined to less than significant prior to mitigation. No mitigation is required.

#### Operation

Operational activities associated with the near-term, site-specific whole site modernization projects would not substantially block or interfere with views from a designated scenic vista. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

***Threshold 2: Would the Proposed Program substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

New acquisition would be an administrative procedure and would not directly result in any physical changes to the environment. However, once the site has been acquired, the construction of a new school or administrative facility on that site would result in physical changes that could damage scenic resources along a designated scenic highway. As discussed in Section 4.1.2.3, designated scenic highways within or near the Program area include SR-52 from roughly Santo Road to Mast Boulevard, SR-163 through Balboa Park, and SR-75 San Diego-Coronado Bay Bridge.

The majority of the portion of SR-52 that is a designated scenic highway traverses Mission Trails Regional Park and falls outside the Program area. In addition, Mission Trails Regional Park contains open space and conservation land that would not be available for a new site acquisition. While a short segment of the designated portion of SR-52 does fall within the Program area (an approximately 0.7-mile segment east of Santo Road), this area is built out with residential uses and there are no vacant parcels within the SR-52 viewshed that would be available for acquisition, and this analysis does not assume acquisition by eminent domain due to the unlikeliness of this occurring. Similarly, because the designated portion of SR-163 travels through Balboa Park, there is no opportunity for site acquisitions within the viewshed of that state scenic highway. SR-75 San Diego-Coronado Bay Bridge does not fall within the Program area. However, views from the 200-foot-tall bridge are expansive in all directions, including views of downtown San Diego, which contains several District facilities. Scenic elements within views to the north and northwest from SR-75 (the areas containing District facilities within the SR-75 viewshed) largely comprise the high-rise buildings that form the skyline of downtown San Diego, the institutional or visitor-serving uses that front the Bay along the Embarcadero, the Tenth Avenue Marine Terminal, and the open water of the San Diego Bay. As noted above, the bridge is only open to motor vehicles, there are no pullouts

for viewing, and stopping on the bridge is prohibited by law. Also, the bridge has a speed limit of 50 miles per hour and a concrete guardrail that limits the view in lower-profile vehicles. Generally, because of the very high-density development of downtown and the distance of the bridge from downtown, scenic resources such as trees or historic buildings are not highly visible from the bridge. Construction activities associated with new school or administrative facilities may fall within the viewshed available from the bridge should a site acquisition occur in this area. Because industrial uses occupy the Bayfront in middleground views from the bridge and residential uses are primarily located north of East Harbor Drive, any new site acquisitions would be north of East Harbor Drive. Given this distance, any construction activities associated with new school or administrative facilities would only be minimally discernible within the broader context of the dense development pattern of the area and would blend in with the industrial uses that front the Bay. Based on the above, impacts on designated state scenic highways would be less than significant.

However, it would be possible for new site acquisitions to occur within the viewsheds of the eligible state scenic highways. If these segments became officially designated state scenic highways, any construction activities occurring within the viewshed of those highways has the potential to damage scenic resources within the viewsheds of future state scenic highways. Given the built-out nature of the majority of the communities within the Program area, scenic resources would most often be those associated with the city of San Diego's urbanized landscape, including historic buildings, canyon slopes, or trees, with only a few areas potentially containing resources associated with a more semi-rural landscape, such as rock outcroppings. New site acquisitions could include properties containing these resources and construction activities associated with new school or administrative buildings has the potential to result in damage to or removal of these resources, which would result in a significant impact (**Impact-AES-5**). Implementation of **MM-AES-4** would help reduce impacts on scenic resources resulting from the construction of a new school or administrative facility. However, because specific sites are not known at this time and site or project constraints may require removal of a scenic resource, it cannot be concluded that **MM-AES-4** would be able to completely mitigate this impact to less-than-significant levels. Therefore, **Impact-AES-5** would remain significant and unavoidable.

***Operation***

As discussed above, construction activities associated with new school or administrative facilities could result in damage to or removal of scenic resources within eligible state scenic highways. However, operational activities associated with this project category would involve occupation and use of the new facility by students, District employees, and the community, which would not further damage or require further removal of scenic resources within the viewshed of a state scenic highway. In addition, given the densely developed environment of the Program area through which the eligible scenic highways travel, school or administrative facilities are expected components within the overall urban fabric of the viewshed, and new facilities at new sites would not adversely affect the viewshed. Impacts on scenic resources related to operations of new school and administrative facilities would be less than significant.

### Level of Significance Prior to Mitigation

Implementation of the Proposed Program would not have a substantial adverse effect on an existing officially designated scenic vista; however, because new highway segments are added to the state scenic highway program on a periodic basis and because the Proposed Program has a horizon year of approximately 2030, it is possible that future projects occurring under implementation of the

Proposed Program could be constructed within the viewshed of an officially designated state scenic highway, and the Proposed Program could result in significant impacts on scenic resources within a state scenic highway. Potentially significant impacts are discussed below.

***Construction***

**Impact-AES-5: Potential to Damage Scenic Resources Within an Eligible or Officially Designated State Scenic Highway During New Construction.** Construction activities associated with new acquisition and new school or administrative facilities have the potential to remove or damage scenic resources, including historic buildings, trees, or rock outcroppings, within a state scenic highway. This is a potentially significant impact.

***Operation***

As discussed above, operational activities associated with new school or administrative facilities would not result in damage to or removal of any scenic resources. Impacts from implementation of this project category would be less than significant on scenic resources within a state scenic highway.

### Mitigation Measures

For **Impact-AES-5**:

**MM-AES-4: Preserve Scenic Resources.** During the project planning phases, the District shall review Caltrans' State Scenic Highway Program to determine if the project site falls within an officially designated state scenic highway. If the project site falls outside an officially designated scenic highway, no further action is required. If the project site falls within an officially designated scenic highway the following steps shall be implemented:

- If the project site is within a state scenic highway, the District shall avoid damaging, moving, or removing trees, rock outcroppings, historic structures, and other scenic resources from eligible or designated state scenic highway corridors and local scenic resources where those scenic resources are relevant to the designation or eligibility for designation as a state scenic highway or are identified as a protected visual resource in local plans.
- For projects within or adjacent to a designated or eligible state scenic highway corridor, prior to project approval, the District shall complete design studies identifying site-specific mitigation measures, and during project construction shall implement such mitigation measures to reduce impacts on the quality of the views or visual experience that originally qualified the highway for scenic designation and project status of local resources in approved plans.

The District shall review any design studies and site-specific mitigation measures prior to approval of the project and determine the residual level of significance.

### Level of Significance After Mitigation

***Construction***

Implementation of **MM-AES-4** would help reduce impacts on scenic resources resulting from the construction of a new school or administrative facility. However, because specific sites are not known at this time and site or project constraints may require removal of a scenic resource, it

cannot be concluded that **MM-AES-4** would be able to completely mitigate this impact to less-than-significant levels. Therefore, **Impact-AES-5** would remain significant and unavoidable.

#### *Operation*

As discussed above, operational activities associated with a new school or administrative facility would not result in damage to or removal of any scenic resources. Impacts from implementation of this project category would be less than significant on scenic resources within a state scenic highway.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

As discussed in Section 4.1.2.3, the only existing District facility to potentially occur within the viewshed of a designated state scenic highway is Perkins Elementary, which is near SR-75 San Diego Coronado Bay Bridge. While any construction activities associated with a whole site modernization of Perkins Elementary may be visible from the bridge, these activities would be barely discernible within the dense development of the downtown setting. In addition, Perkins Elementary is north of the working waterfront area that comprises middleground views from SR-75. Given the speed of travel, the lack of any pull-outs, and the guardrails that minimize low-profile views from the bridge, any construction activities occurring at the site, or construction equipment visible at the site, would likely be interpreted as part of the industrial activities of the working waterfront. Finally, because a whole site modernization would occur within the boundaries of the project site, no scenic resources would be damaged or removed from the viewshed. Impacts related to an existing designated scenic highway would be less than significant.

As discussed above, there are several District facilities that potentially fall within the viewsheds of the eligible state scenic highways. Generally, whole site modernizations would be contained within the boundaries of an existing District facility and would not result in the damage of any offsite scenic resources. However, some District facilities are considered historic resources, and some sites may also contain trees or other features that would be considered scenic resources within the viewshed of a future designated state scenic highway. Should a whole site modernization project occurring under the Proposed Program require demolition or removal of these scenic resources, a significant impact would occur during construction activities (**Impact-AES-6**). Implementation of **MM-AES-4** would reduce impacts on scenic resources resulting from construction activities during a whole site modernization project because it would ensure that no scenic resources are damaged during construction. However, because specific site plans are unknown at this time, it is possible that construction of whole site modernization projects could still result in the damage or removal of scenic resources. Therefore, **Impact AES-6** would remain significant and unavoidable.

#### *Operation*

As discussed above, construction activities associated with whole site modernization could result in damage to or removal of scenic resources within eligible state scenic highways. However, operational activities associated with this project category would involve occupation and use of the facility by students, District employees, and the community, which would not further damage or require further removal of scenic resources within the viewshed of a state scenic highway. In

addition, given the densely developed environment of the Program area through which the eligible scenic highways travel, school or administrative facilities are expected components within the overall urban fabric of the viewshed and would not adversely affect the viewshed. Impacts on scenic resources related to operations of whole site modernizations would be less than significant.

#### Level of Significance Prior to Mitigation

***Construction***

**Impact-AES-6: Potential to Damage Scenic Resources Within an Eligible or Officially Designated State Scenic Highway.** Construction activities associated with whole site modernization and joint-use facilities development including fields, pools, and the Play All Day program have the potential to remove or damage scenic resources, including historic buildings, trees, or rock outcroppings, within a state scenic highway. This is a potentially significant impact.

***Operation***

As discussed above, operational activities associated with whole site modernization projects would not result in damage to or removal of any scenic resources. Impacts from implementation of this project category would be less than significant on scenic resources within a state scenic highway.

#### Mitigation Measures

For **Impact-AES-6**:

Implement **MM-AES-4**, as described above**.**

#### Level of Significance After Mitigation

***Construction***

Implementation of **MM-AES-4** would reduce impacts on scenic resources resulting from construction activities during a whole site modernization project because it would ensure that no scenic resources are damaged during construction. However, because specific site plans are unknown at this time, it is possible that construction of whole site modernization projects could still result in the damage or removal of scenic resources. Therefore, **Impact-AES-6** would remain significant and unavoidable.

***Operation***

As discussed above, operational activities associated with a whole site modernization project would not result in damage to or removal of any scenic resources. Impacts from implementation of this project category would be less than significant on scenic resources within a state scenic highway.

## Upgrades of Existing School and Administrative Sites

#### Impact Discussion

***Construction***

Upgrades of existing school and administrative sites would include interior modernization of buildings and systems with minimal exterior improvements, which would involve minor construction activities with light equipment and short durations. As discussed in Section 4.1.2.3, the

only existing District facility to potentially occur within the viewshed of a designated state scenic is Perkins Elementary, which is near SR-75 San Diego Coronado Bay Bridge. Construction activities associated with upgrades to this school would generally be contained within the site, and there are no scenic resources located at Perkins Elementary. Impacts related to an existing designated state scenic highway would be less than significant.

While construction activities associated with upgrades of an existing school or administrative site may occur within the viewshed of a future designated state scenic highway, again, because construction activities would be contained within the site, they would not have the potential to substantially damage scenic resources within a state scenic highway. Impacts related to construction activities of existing facility upgrades would be less than significant.

#### *Operation*

Operational activities associated with upgrades of existing school and administrative sites would involve occupation and use of the facility by students, District employees, and the community, which would not further damage or require further removal of scenic resources within the viewshed of a state scenic highway. In addition, given the densely developed environment of the Program area through which the eligible scenic highways travel, school or administrative facilities are expected components within the overall urban fabric of the viewshed and would not adversely affect the viewshed. Impacts on scenic resources related to operations of upgrades of existing school and administrative sites would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would not result in substantial adverse impacts on scenic resources within a state scenic highway. Impacts would be less than significant.

#### *Operation*

As discussed above, operational activities associated with upgrades of existing school and administrative sites would not result in damage to or removal of any scenic resources. Impacts from implementation of this project category would be less than significant on scenic resources within a state scenic highway.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would not result in substantial adverse impacts on scenic resources within a state scenic highway. Impacts would be less than significant.

***Operation***

Operational activities associated with upgrades of existing school and administrative sites would not result in damage to or removal of any scenic resources. Impacts from implementation of this project category would be less than significant on scenic resources within a state scenic highway.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

***Construction***

Except for Perkins Elementary, there are no existing District facilities within the viewshed of an existing designated state scenic highway; as discussed above, development at Perkins Elementary does not have the potential to affect scenic resources within the viewshed of state scenic highway, and impacts would be less than significant. Therefore, this analysis focuses on whether joint-use facilities would have the potential to damage scenic resources within an eligible state scenic highway. Development of joint-use facilities would generally involve the creation or renovation of sports fields, walking tracks, or swimming pools and associated structures, which could require the removal of scenic resources. Because these construction activities could occur near eligible state scenic highways, construction activities associated with joint-use facilities could potentially damage scenic resources within a future designated state scenic highway. Therefore, the potential for development of joint-use facilities to substantially damage scenic resources within a state scenic highway would be considered a significant impact (**Impact-AES-6**). Implementation of **MM-AES-4** would reduce impacts on scenic resources resulting from construction activities of joint-use facilities because it would ensure that no scenic resources are damaged during construction. However, because specific site plans are unknown at this time, it is possible that construction of whole site modernization projects could still result in the damage or removal of scenic resources. Therefore, **Impact AES-6** would remain significant and unavoidable.

***Operation***

Operational activities associated with joint-use facilities would involve occupation and use of the new facility by students, District employees, and the community, which would not further damage or require further removal of scenic resources within the viewshed of a state scenic highway. In addition, given the densely developed environment of the Program area through which the eligible scenic highways travel, school or administrative facilities are expected components within the overall urban fabric of the viewshed and new facilities at new sites would not adversely affect the viewshed. Impacts on scenic resources related to operations of joint-use facilities would be less than significant.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-AES-6: Potential to Damage Scenic Resources Within an Eligible or Officially Designated State Scenic Highway.** Construction activities associated with whole site modernization and joint-use facilities development including fields, pools, and the Play All Day program have the potential to remove or damage scenic resources, including historic buildings, trees, or rock outcroppings, within a state scenic highway. This is a potentially significant impact.

#### *Operation*

As discussed above, operational activities associated with joint-use facilities would not result in damage to or removal of any scenic resources. Impacts from implementation of this project category would be less than significant on scenic resources within a state scenic highway.

### Mitigation Measures

For **Impact-AES-6:**

Implement **MM-AES-4**, as described above**.**

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-AES-4** would reduce impacts on scenic resources resulting from construction activities for joint-use facilities because it would ensure that no scenic resources are damaged during construction activities associated with a joint-use facility project. However, because specific site plans are unknown at this time, it is possible that construction of joint-use facilities could still result in the damage or removal of scenic resources. Therefore, **Impact-AES-6** would remain significant and unavoidable.

### Operation

Operational activities associated with joint use facilities would not result in damage to or removal of any scenic resources. Impacts from implementation of this project category would be less than significant on scenic resources within a state scenic highway.

## Site-Specific Analysis

### Impact Discussion

### Construction

As discussed under the *Program-Level Analysis* above, the only existing District facility (and only near-term, site-specific whole site modernization project) to potentially occur within the viewshed of a designated state scenic highway is Perkins Elementary, which is near SR-75 San Diego Coronado Bay Bridge. While any construction activities associated with the near-term whole site modernization of Perkins Elementary may be visible from the bridge, these activities would be barely discernible within the dense development of the downtown setting. In addition, Perkins Elementary is north of the working waterfront area that comprises middleground views from SR-75. Given the speed of travel, the lack of any pull-outs, and the guardrails that minimize low-profile views from the bridge, any construction activities occurring at the site, or construction equipment visible at the site, would likely be interpreted as part of or obscured by the industrial activities of the working waterfront. Finally, because a whole site modernization would occur within the boundaries of the project site, no scenic resources would be damaged or removed from the viewshed. Impacts related to an existing designated scenic highway would be less than significant.

#### Operation

While a whole site modernization of Perkins Elementary could result in taller or larger buildings or other features at the school's campus, these features would not be discernible from the surrounding context within the viewshed available from SR-75. In addition, these improvements would not require the removal of any scenic resources within this viewshed. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

Whole site modernization projects occurring at the 21 near-term project sites would result in less-than-significant impacts on scenic resources within a state scenic highway.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### Construction

Construction activities associated with the near-term, site-specific whole site modernization projects would not damage any scenic resources within a state scenic highway. Impacts would be less than significant.

#### Operation

Operational activities associated with the near-term, site-specific whole site modernization projects would not damage any scenic resources within a state scenic highway. Impacts would be less than significant.

***Threshold 3: In non-urbanized areas, would the Proposed Program 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). In urbanized areas, would implementation of the Proposed Program conflict with applicable zoning and other regulations governing scenic quality?***

## Program-Level Analysis

The Program area is contained entirely within the city of San Diego, which, per Section 21071 of the State CEQA Guidelines, meets the definition of an urbanized area (an incorporated city with a population of at least 100,000 persons), and normally this analysis would consider whether the project would conflict with applicable zoning and other regulations governing scenic quality. However, pursuant to a Resolution of the Board of Education under California Government Code Section 53094, the District is exempt from the City of San Diego's Zoning Code, which governs the areas surrounding District properties. The District's governing board may not take this action when the proposed use of the property by the District is for non-academic facilities, including, but not limited to, warehouses, administrative buildings, and automotive storage and repair buildings. Therefore, even though the Proposed Program would occur in an urbanized area, this analysis

focuses on the potential for the Proposed Program to substantially degrade the existing visual character or quality of public views in the Program area.

## New Acquisition and New School or Administrative Facilities

### Impact Discussion

#### *Construction*

Construction of new school or administrative facilities would involve substantial grading activities and the presence of heavy construction equipment at a project site for multiple years. Construction activities have the potential to degrade the visual character and quality of sites of new school or administrative facilities from public views in the surrounding area, which would result in a temporary significant impact related to visual character (**Impact-AES-7**). Implementation of **MM-AES-1** would shield construction activities for new school and administrative facilities from public views in the area surrounding the project site, which would reduce impacts related to visual character and quality (**Impact-AES-7**) to less-than-significant levels.

#### *Operation*

Development of new school or administrative facilities could involve development of new school campuses, including multiple buildings, play areas/sports fields, and parking lots, on sites that likely do not contain existing school campuses. From a visual character perspective, school campuses include several acres of land developed with multiple buildings that vary in their site plans (including the buildings' arrangement to each other as well as to the surrounding roadways, i.e., setbacks), heights, and massing, and architectural style. School campuses also include large open grass fields or paved play areas. Given these characteristics, school campuses are often distinguishable from the surrounding development, which usually comprises residential uses, including a mix of single- and multi-family housing, with a regular development pattern (i.e., houses or apartment buildings with relatively consistent architecture, heights, massing, and roadway setbacks).

While they are distinguishable from surrounding development, the architecture of school facilities generally does not include features that are incompatible with the surrounding development, such as substantially taller or larger buildings. For example, a school campus would not include buildings taller than what is required for an auditorium or gymnasium, which is around two stories in height. Campuses also generally do not contain any single building with substantial mass (such as one would see with a large, warehouse-style retail establishment). In addition, campus design for larger facilities, such as middle and high schools, often involves clustering the buildings toward the center of the site with open fields, parking lots, and entrance features (sidewalks, landscaping) fronting the adjacent roadways. This site arrangement minimizes the prominence of the larger buildings within views from the adjacent public roadways. Furthermore, school campuses are expected visual components within residential neighborhoods. Finally, as part of District procedures related to development of new school and administrative facilities, the District forms a Design Task Force that includes three or four public meetings during a 6 to 8-week period during the planning process for construction of new facilities or the modernization of existing facilities. The Design Task Force process provides an opportunity for stakeholders, including students, staff, parents, and the community to give input on the project, including input on the design of the facilities, which would help minimize incompatible design features. Planning and design of a new school would also be

compliant with the District's Standard Design Guide, the Educational Specifications, and Landscape Guide, which all emphasize the role of a school as a community asset that should blend with and be aesthetically pleasing and respectful within the context of the surrounding neighborhood (see Section 4.1.3.2 above). Based on the above, the presence of a new school campus within an existing neighborhood would not cause the degradation of the visual character of the site or surrounding area, and impacts would be less than significant.

Regarding administrative facilities, the District's administrative facilities often include office buildings located in areas that contain other commercial uses. As such, these buildings generally would conform in size and massing to the surrounding development. Impacts on visual character related to administrative facilities would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-AES-7: Degradation of Visual Character and Quality During Construction.** Construction activities associated with new school or administrative facilities have the potential to result in the degradation of the visual character and quality at the project site. This is a potentially significant impact.

#### *Operation*

Impacts on visual character and quality related to operation of a new school or administrative would be less than significant.

### Mitigation Measures

For **Impact-AES-7:**

Implement **MM-AES-1**, as described above**.**

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-AES-1** would shield construction activities for new school and administrative facilities from public views in the area surrounding the project site, which would reduce impacts related to visual character and quality (**Impact-AES-7**) to less-than-significant levels.

#### *Operation*

Impacts on visual character and quality related to operation of a new school or administrative facility would be less than significant. No mitigation is required.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

Whole site modernization would involve varying types and intensities of construction activities, including the demolition of existing buildings and construction of new replacement buildings as well as improvements to athletic facilities, such as new or reconfigured athletic fields or gymnasiums. Construction activities associated with whole site modernization would potentially involve the presence of heavy construction equipment, such as haul trucks, cranes, and excavators, that would be present for multiple years. However, construction activities would be completely contained within the project boundaries and would require only minor grading. In addition, because of existing structures, perimeter fencing, and landscaping within these sites, the visibility of improvements would be minimal from the surrounding area. Impacts on visual character and quality related to construction activities of whole site modernizations would be less than significant.

#### *Operation*

Whole site modernization would occur at existing school sites, but while the intensity of development varies under this category, whole site modernization could involve substantial redevelopment of an entire existing campus and the reconstruction of buildings that involve greater height or massing and other features similar to those described above for new school construction, with the only difference being that the community is already accustomed to a school facility at the site. However, for the same reasons detailed for new school construction, including implementation of the Design Task Force and public outreach process and compliance with the District's Standard Design Guide, Educational Specifications, and Landscape Guide, whole site modernizations would not result in the degradation of the visual character of the site or surrounding area, and impacts related to visual character would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with whole site modernization would not result in degradation of visual character and quality. Impacts would be less than significant.

#### *Operation*

Impacts on visual character and quality related to operation of a whole site modernization would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with whole site modernization would not result in degradation of visual character and quality. Impacts would be less than significant.

***Operation***

Impacts on visual character and quality related to operation of a whole site modernization would be less than significant.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

***Construction***

Upgrades of existing school and administrative sites would include interior modernization of buildings and systems with minimal exterior improvements, which would involve minor construction activities with light equipment and short durations. These construction activities would be contained within the site and would not affect the visual character of the site or the surrounding area. Impacts related to construction activities of existing facility upgrades would be less than significant and mitigation is not required.

***Operation***

Upgrades of existing school and administrative sites would include interior modernization of buildings and systems with minimal exterior improvements, which would not alter the existing visual character of the site. Therefore, impacts on visual character related to upgrades of existing school and administrative sites would be less than significant.

### Level of Significance Prior to Mitigation

***Construction***

Construction activities associated with upgrades of existing school and administrative sites would not result in degradation of visual character and quality. Impacts would be less than significant.

***Operation***

Impacts on visual character and quality related to operation of upgrades of at existing facilities would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

***Construction***

Construction activities associated with upgrades of existing school and administrative sites would not result in degradation of visual character and quality. Impacts would be less than significant.

***Operation***

Impacts on visual character and quality related to operation of upgrades at existing facilities would be less than significant.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

While development of joint-use facilities would occur within existing park space and would generally involve low-profile development such as the creation or renovation of sports fields or walking tracks, joint-use facilities could also include structures, including recreational facilities or swimming pools with associated equipment buildings, restrooms, and concessions stands, which could require the use of heavy construction equipment. Except for swimming pools, which would require more grading to reach the required depths, grading activities are expected to be minimal and construction durations would be short. However, while swimming pools would require deeper grading, the overall area for the swimming pool would not be large. Therefore, the potential for construction activities associated with joint-use facilities to result in an adverse effect on the visual character of the site and surrounding area would be minimal, and impacts would be less than significant.

#### *Operation*

The visual character of parks and recreational facilities is generally defined by a combination of elements, including the presence of open, grassy playfields (such as baseball diamonds or soccer fields), hardcourts (e.g., tennis or basketball courts), playgrounds with play equipment, and recreational buildings that often include a two-story gymnasium. Other features can include picnic tables and shade structures or gazebos. Development associated with joint-use facilities would occur within existing parks and would generally involve low-profile components such as the creation or renovation of sports fields or walking tracks and could involve new structures related to new/redeveloped recreational buildings or swimming pools and associated structures for equipment, restrooms, and concessions. Similar to whole site modernizations, improvements occurring under this category would take place within an existing park and the community is already accustomed to a park being located at the site. While development of joint-use facilities could increase the intensity of development and result in the reorganization of playfields, etc., within an existing park, these improvements would retain most of the features that contribute to the visual character of a park, including large, grassy playfields, hardcourts, playgrounds, and recreational buildings. Therefore, a joint-use facility would not result in the substantial degradation of the visual character of the site and surrounding area. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with joint-use facilities would not result in degradation of visual character and quality. Impacts would be less than significant.

#### *Operation*

Impacts on visual character and quality related to operation of joint-use facilities would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with joint-use facilities would not result in degradation of visual character and quality. Impacts would be less than significant.

#### *Operation*

Impacts on visual character and quality related to operation of joint-use facilities would be less than significant.

## Site-Specific Analysis

### Impact Discussion

#### Construction

Construction activities associated with the whole site modernizations for the 21 near-term projects listed in Table 4.1-3 would involve varying types and intensities of construction activities, including the demolition of existing buildings and construction of new replacement buildings as well as improvements to athletic facilities, such as new or reconfigured athletic fields or gymnasiums. Construction activities would potentially involve the presence of heavy construction equipment, such as haul trucks, cranes, and excavators, that would be present for multiple years. However, construction activities would be completely contained within the project boundaries and would require only minor grading. In addition, because of existing structures, perimeter fencing, and landscaping within these sites, the visibility of improvements would be minimal from the surrounding area. Impacts on visual character and quality related to construction activities of whole site modernizations would be less than significant.

#### Operation

The near-term, site-specific whole site modernization projects proposed for the 21 schools listed on Table 4.1-3 could involve substantial redevelopment of an entire existing campus and the reconstruction of buildings that involve greater height or massing and introduce new features to the site (such as improved athletic facilities, etc.). Depending on the scale of improvements occurring at one of the site-specific whole site modernizations, the District would implement the Design Task Force and public outreach process to obtain community input on the project. However, all of the near-term, site-specific whole site modernization projects would be compliant with the District's Standard Design Guide, Educational Specifications, and Landscape Guide. Therefore, the near-term, site-specific whole site modernization projects would not result in the degradation of the visual character of the site or surrounding area, and impacts related to visual character would be less than significant.

### Level of Significance Prior to Mitigation

Whole site modernization projects occurring at the 21 near-term project sites would result in less than significant impacts on visual character and quality.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### Construction

Construction activities associated with the near-term, site-specific whole site modernization projects would not result in the degradation of the visual character and quality of the site or surrounding area. Impacts would be less than significant.

#### Operation

Operational activities associated with the near-term, site-specific whole site modernization projects would not result in the degradation of the visual character and quality of the site or surrounding area. Impacts would be less than significant.

***Threshold 4: Would the Proposed Program create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

Nighttime lighting sources during construction would consist of floodlights that would be focused on the work area to minimize light spillover. In the absence of existing District nighttime construction standards, nighttime construction activities would be limited to activities that would be consistent with the City of San Diego Noise Abatement and Control Ordinance Section 59.5.0404, which specifies that any loud construction noise is only permitted from 7 a.m. to 7 p.m., Monday through Saturday (see Section 4.10, *Noise*). This would require construction activities to cease operation by 7 p.m., and lights for construction work (e.g., bright pole-mounted balloon lights) would not be used beyond this timeframe. Some lighting may be used overnight at the construction site for security reasons, but overnight construction lighting would not generally be used. Any lighting used for security reasons would involve downward facing, shielded lights. Moreover, given the urbanized context of the Program area, construction lighting from the project site would blend in with the other sources of light in the area. Therefore, impacts related to lighting during construction would be less than significant.

Regarding glare, increased truck traffic and transport of construction materials to the project site would temporarily increase glare conditions as a result of light reflecting off vehicle windshields and construction materials. However, this increase in glare would be temporary and would appear to be part of existing glare conditions. As such, the temporary increase in motor vehicle traffic that would occur during construction activities occurring under the Proposed Program would not be considered a new source of substantial glare. The increased truck traffic would blend in with the existing traffic and would be comparable to other truck traffic created by construction activities that regularly occur throughout San Diego. Therefore, construction activities related to new school or administrative facilities would not create a new source of substantial glare that would affect daytime views in the area. Impacts would be less than significant.

***Operation***

Generally, lighting used for new school or administrative facilities would involve minimal nighttime lighting for ornamental or security lighting, which would be placed around landscaping or mounted on the buildings and in the parking lots. Lighting fixtures would include downward-focused, shielded lights, which would not represent a substantial source of new nighttime lighting. However, development of new high schools could include new athletic fields (e.g., football, baseball) that would include nighttime stadium lighting and other sources of lighting, such as marquee signs, which could result in a substantial new source of nighttime lighting that would adversely affect nighttime views in the area. Sports field lighting at District facilities typically includes light-emitting diode (LED) lighting standards that feature downward-facing luminaires and are mounted at heights that produce narrow beam angles to keep light focused downward onto the field and bleachers. The lighting standards also include reflectors and visors to focus light at the field and reduce the amount of upward light. These features would help reduce light pollution related to sky glow and light trespass. However, because specific locations for site acquisitions and site plans for new school facilities are not known at this time, impacts related to new lighting, such as light trespass or sky glow, could still occur depending on the nature of the project site (if it is in an area with an existing dark landscape versus an area with high ambient brightness), the location of the athletic field within each site, and the exact specifications for the lighting standards. Because these factors are unknown, it is possible that new school facilities with nighttime lighting for athletic fields could result in a significant impact (**Impact-AES-8**). Implementation of mitigation measure **MM-AES-5** would be required, which would help reduce impacts related to new athletic field lighting by requiring a lighting study that analyzes light trespass and sky glow and would minimize any effects found to be significant. However, because the degree of lighting impacts on nearby residences cannot be quantified at this time, impacts remain significant and unavoidable.

New sources of glare occurring under this category could result from reflective building materials. Generally, finishing materials for new schools would include a combination of non-reflective building materials such as cement, plaster, and concrete as well as the more minimal use of reflective materials such as glass and metal. Additional sources of glare from new school or administrative facilities could include solar panels, which would usually be located on top of buildings or shade structures in parking lots, as well as a potential increase in parked cars at new sites. However, regarding solar panels, District facilities have been and would continue to be constructed with dark-colored (blue or black) materials and would be covered with anti-reflective coatings. As such, new school or administrative facilities would not produce substantial new sources of glare, and impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Impacts on nighttime lighting and glare related to construction of a new school or administrative facility would be less than significant.

#### *Operation*

**Impact-AES-8: Substantial Increase of Nighttime Lighting.** Operation of a new school, particularly new high schools with athletic fields, have the potential to result in a substantial increase of nighttime lighting caused by the addition of athletic field lighting for nighttime outdoor athletic activities (e.g., football or baseball games). This is a potentially significant impact.

### Mitigation Measures

For **Impact-AES-8**:

**MM-AES-5: Conduct a Lighting Analysis and Minimize Impacts on Nearby Residences.** During subsequent CEQA evaluations for new school or administrative facilities or whole site modernizations that would involve installation of new, or replacement of, athletic field lighting, the District shall conduct a lighting analysis that analyzes sky glow, light trespass, and glare using the standards developed by the Institution of Lighting Engineers, the Illuminating Engineering Society of North America, and the Electric Power Research Institute to determine if illuminance produced by the project would be significant. If found to be significant, the District shall minimize light trespass, to the extent feasible. Measures to reduce light trespass could include, but are not limited to, the following:

- Locate new sources of lighting as far from nearby residences as possible.
- Use fencing and vegetation to soften the intensity of lighting on nearby residences.
- Install LED lighting standards that feature downward-facing luminaires with reflectors and visors to focus light at the field to reduce the amount of upward or trespass light.
- Mount lights at heights that produce narrow beam angles.

The District shall consider the lighting analysis and proposed measures to reduce light trespass and determine the residual level of significance prior to approval of any specific project under this Program.

### Level of Significance After Mitigation

#### *Construction*

Impacts on nighttime lighting and glare related to construction of a new school or administrative facility would be less than significant. No mitigation is required.

#### *Operation*

Implementation of **MM-AES-5** would help reduce impacts related to new athletic field lighting (**Impact-AES-8**), but, because the degree of lighting impacts on nearby residences cannot be quantified at this time, impacts remain significant and unavoidable.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

Similar to new school and administrative facilities, nighttime lighting sources during construction of whole site modernization projects may consist of floodlights that would be focused on the work area to minimize light spillover. Nighttime construction activities would be limited to activities that would not violate the City of San Diego Noise Abatement and Control Ordinance Section 59.5.0404, which specifies that any loud construction noise is only permitted from 7 a.m. to 7 p.m., Monday through Saturday. This would require construction activities to cease operation by 7 p.m., and lights for construction work (e.g., bright pole-mounted balloon lights) would not be used beyond this timeframe. Although no nighttime lighting would be used for construction activities, some lighting may be used overnight at the construction site for security reasons. Any lighting used for security reasons would involve downward facing, shielded lights. Moreover, given the urbanized context of the Program area, construction lighting from the project site would blend in with the other sources of light in the area. Therefore, impacts related to lighting during construction would be less than significant.

Regarding glare, increased truck traffic and transport of construction materials to the project site would temporarily increase glare conditions as a result of light reflecting off vehicle windshields and construction materials. However, this increase in glare would be temporary and would appear to be part of existing glare conditions. As such, the temporary increase in motor vehicle traffic that would occur during construction activities occurring under the Proposed Program would not be considered a new source of substantial glare. The increased truck traffic would blend in with the existing traffic and would be comparable to other truck traffic created by construction activities that regularly occur throughout San Diego. Therefore, construction activities related to whole site modernizations would not create a new source of substantial glare that would affect daytime views in the area. Impacts would be less than significant.

#### *Operation*

Whole site modernization could include reconstruction of all buildings within an existing campus, which would involve similar sources of lighting as new school or administrative facilities, including ornamental or security lighting, which would be placed around landscaping or mounted on the buildings and in the parking lots. Lighting fixtures would include downward-focused, shielded lights, which would minimize spillover light and would not represent a new substantial source of nighttime lighting. Lastly, any new or upgraded lighting would be operated consistent with District AR 3511(a), which requires that lighting be turned off once all students and staff have left a school facility. Impacts related to this lighting would be less than significant.

Whole site modernization could also involve new or upgraded athletic facilities; however, only upgrades to existing athletic field lighting would occur under whole site modernizations. This project category would not involve installation of new athletic field lighting. Upgrades would include similar specifications as those described above, including LED lighting standards that feature downward-facing luminaires with reflectors and visors to focus light at the field, which would reduce the amount of upward or trespass light, mounted at heights that produce narrow beam angles. These upgrades of existing athletic fields would improve light spillover conditions due to replacement of old metal-halide lighting standards, which produce more light spillover and are not

typically downward facing or shielded, with new LED lighting standards. Therefore, impacts related to light and glare from implementation of whole site modernization projects would be less than significant.

Sources of glare would be similar to those discussed under New Acquisition and New School or Administrative Facilities, including new reflective building finishing materials such as glass or metal, a potential increase in vehicles at the site, or solar panels. However, for the reasons discussed above, whole site modernizations would not produce new, substantial sources of glare, and impacts would be less than significant.

#### Level of Significance Prior to Mitigation

##### *Construction*

Impacts on nighttime lighting and glare related to construction of a whole site modernization project would be less than significant.

##### *Operation*

Operation associated with whole site modernization projects would not include installation of new athletic field lighting or other activities that could result in a substantial increase in nighttime lighting or glare. Impacts would be less than significant.

#### Mitigation Measures

No mitigation is required.

#### Level of Significance After Mitigation

##### *Construction*

Impacts on nighttime lighting and glare related to construction of a whole site modernization project would be less than significant. No mitigation is required.

##### *Operation*

Operation associated with whole site modernization projects would not include installation of new athletic field lighting or other activities that could result in a substantial increase in nighttime lighting or glare. Impacts would be less than significant. No mitigation is required.

### Upgrades of Existing School and Administrative Sites

#### Impact Discussion

##### *Construction*

Upgrades of existing school and administrative sites would include interior modernization of buildings and systems with minimal exterior improvements, which would involve minor construction activities with light construction equipment and short durations. These construction activities would be contained within the site and would not produce substantial sources of light or glare. Impacts would be less than significant.

***Operation***

Upgrades of existing school and administrative sites would include interior modernization of buildings and systems with minimal exterior improvements, which would not result in a substantial source of nighttime lighting or glare. Lastly, any new or upgraded lighting would be operated consistent with District AR 3511(a), which requires that lighting be turned off once all students and staff have left a school facility. Therefore, impacts would be less than significant.

### Level of Significance Prior to Mitigation

***Construction***

Impacts on nighttime lighting and glare related to construction during upgrades of existing school and administrative sites would be less than significant.

***Operation***

Operation associated with upgrades of existing school and administrative sites would not include installation of athletic field lighting or other activities that could result in a substantial increase in nighttime lighting or glare. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

***Construction***

Impacts on nighttime lighting and glare related to construction during upgrades of existing school and administrative sites be less than significant.

***Operation***

Operation associated with upgrades of existing school and administrative sites would not include installation of athletic field lighting or other activities that could result in a substantial increase in nighttime lighting or glare. Impacts would be less than significant.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

***Construction***

Construction activities related to joint-use facilities may involve similar sources of lighting and glare as described for whole site modernizations, i.e., floodlights that would be focused on the work area to minimize light spillover and increased truck traffic and transport of construction materials. Nighttime construction activities would be limited to activities that would not violate the City of San Diego Noise Abatement and Control Ordinance Section 59.5.0404, which specifies that any loud construction noise is only permitted from 7 a.m. to 7 p.m., Monday through Saturday. This would require construction activities to cease operation by 7 p.m., and lights for construction work (e.g., bright pole-mounted balloon lights) would not be used beyond this timeframe. While some security lighting may be used past these hours, this lighting would be downward facing and shielded, and

given the urbanized context of the Program area, construction lighting from the project site would blend in with the other sources of light. Sources of glare would also be minimal and would be similar to surrounding sources. Impacts would be less than significant.

***Operation***

Development of joint-use facilities could involve construction of new recreational facilities, including new sports fields. However, sports field lighting would not be included for any new sports fields developed as part of a joint-use facility. Any new lighting added at a joint-use site would include minimal lighting for safety and security, including lighting on new buildings and in parking lots. Therefore, impacts on nighttime lighting related to joint-use facilities would be less than significant.

New sources of glare associated with joint-use facilities would include new swimming pools and increased vehicles at the project site. However, swimming pools would be shielded from nearby public views (such as roadways) by fencing, buildings, and landscaping. Joint-use facilities would not introduce a new, significant source of glare. Impacts would be less than significant and no mitigation is required.

### Level of Significance Prior to Mitigation

***Construction***

Impacts on nighttime lighting and glare related to construction of joint-use facilities would be less than significant.

***Operation***

Operation associated with joint-use facilities would not include installation of athletic field lighting or other activities that could result in a substantial increase in nighttime lighting or glare. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

***Construction***

Impacts on nighttime lighting and glare related to construction of joint-use facilities would be less than significant.

***Operation***

Operation associated with joint-use facilities would not include installation of athletic field lighting or other activities that could result in a substantial increase in nighttime lighting or glare. Impacts would be less than significant.

# Site-Specific Analysis

## Impact Discussion

### Construction

As discussed above under the Program-Level Analysis, nighttime lighting sources during construction of whole site modernization projects may consist of floodlights that would be focused on the work area to minimize light spillover. Nighttime construction activities would be limited to activities that would not violate the City of San Diego Noise Abatement and Control Ordinance Section 59.5.0404, which specifies that any loud construction noise is only permitted from 7 a.m. to 7 p.m., Monday through Saturday. This would require construction activities to cease operation by 7 p.m., and lights for construction work (e.g., bright pole-mounted balloon lights) would not be used beyond this timeframe. Although no nighttime lighting would be used for construction activities, some lighting may be used overnight at the construction site for security reasons. Any lighting used for security reasons would involve downward facing, shielded lights. Moreover, given the urbanized context of the near-term projects, construction lighting from the project site would blend in with the other sources of light in the area. Therefore, impacts related to lighting during construction would be less than significant.

Regarding glare, increased truck traffic and transport of construction materials to the near-term project sites would temporarily increase glare conditions as a result of light reflecting off vehicle windshields and construction materials. However, this increase in glare would be temporary and would appear to be part of existing glare conditions. As such, the temporary increase in motor vehicle traffic that would occur during construction activities associated with the near-term, site-specific whole site modernizations would not be considered a new source of substantial glare. The increased truck traffic would blend in with the existing traffic and would be comparable to other truck traffic created by construction activities that regularly occur throughout San Diego. Therefore, construction activities related to whole site modernizations would not create a new source of substantial glare that would affect daytime views in the area. Impacts would be less than significant.

### Operation

New sources of light under operational conditions for the whole site modernization projects would generally be limited to ornamental or security lighting, which would be placed around landscaping or mounted on the buildings and in the parking lots. Lighting fixtures would include downward-focused, shielded lights, which would minimize spillover light and would not represent a new substantial source of nighttime lighting. Increased lighting at a whole site modernization project could also involve the installation or replacement of athletic field lighting, which would only occur at whole site modernizations of high schools. As indicated on Table 3-2, three high schools are slated for near-term whole site modernizations: Clairemont High, Kearny High, and Madison High. However, these three high schools have already had the athletic field lighting replaced with LED lighting standards that feature downward-facing luminaires with reflectors and visors to focus light at the field to reduce the amount of upward or trespass light, and are mounted at heights that produce narrow beam angles. Therefore, this improvement would not occur as part of the whole site modernizations occurring at these high schools. Impacts related to lighting as part of the near-term, site-specific whole site modernization projects would be less than significant.

New sources of glare at the whole site modernization projects could result from reflective building materials. Generally, finishing materials for would include a combination of non-reflective building materials such as cement, plaster, and concrete as well as the more minimal use of reflective materials such as glass and metal. Additional sources of glare from a whole site modernization project could include solar panels, which would usually be located on top of buildings or shade structures in parking lots, as well as a potential increase in parked cars at new sites. However, regarding solar panels, District facilities have been and would continue to be constructed with dark-colored (blue or black) materials and would be covered with anti-reflective coatings. As such, near-term, site-specific whole site modernization projects would not produce substantial new sources of glare, and impacts would be less than significant.

## Level of Significance Prior to Mitigation

Whole site modernization projects occurring at the 21 near-term project sites would result in less-than-significant impacts regarding new sources of light or glare.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

### Construction

Construction activities associated with the near-term, site-specific whole site modernization projects would not result in a substantial new source of light or glare. Impacts would be less than significant.

### Operation

Operation of the near-term, site-specific whole site modernization projects would not result in a substantial new source of light or glare. Impacts would be less than significant.

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# Section 4.2
# Air Quality and Health Risk

## 4.2.1 Overview

This section describes the existing conditions and applicable laws and regulations for air quality and health risk. The section also discusses the Proposed Program's potential to increase air emissions in the region. Impacts on air quality are considered significant if the proposed project were to (1) conflict with or obstruct implementation of the applicable air quality plan, (2) result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area under an applicable federal or state ambient air quality standard, (3) expose sensitive receptors to substantial pollutant concentrations, or (4) result in other emissions (such as those leading to odors) adversely affecting a substantial of people.

Table 4.2-1 summarizes the significant impacts and mitigation measures (MMs) discussed in Section 4.2.4.3, *Impacts and Mitigation Measures.*

**Table 4.2-1. Summary of Significant Air Quality and Health Risk Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **District-Wide (Applies to All Capital Improvement Projects)** | | | |
| **Impact-AQ-6:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction. | Significant and Unavoidable | **MM-AQ-1** through **MM-AQ-3** would reduce construction emissions; however, reductions cannot be quantified because implementation of mitigation is dependent on the project type, and impacts may not be reduced to levels of significance below the thresholds. |
| **Impact-AQ-7:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Operation. | **MM-AQ-4:** Require Electrical Landscaping Equipment. **MM-AQ-5:** Require Green Consumer Products. | Significant and Unavoidable | Implementation of **MM-AQ-4** and **MM-AQ-5** may not reduce area source emissions for the Proposed Program, and reductions achieved by these measures cannot currently be quantified because their implementation is dependent on project type. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-AQ-14:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of Buildout of the Proposed Program. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction; **MM-AQ-4:** Require Electrical Landscaping Equipment; **MM-AQ-5:** Require Green Consumer Products. | Significant and Unavoidable | Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. |
| **Impact-AQ-15:** Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of Buildout of the Proposed Program. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel. | Significant and Unavoidable | Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction diesel particulate matter (DPM) emissions for major construction projects that do not meet the health risk screening criteria; however, the extent of the reductions is unknown. |
| **Impact-AQ-16:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of Buildout of the Proposed Program. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction; **MM-AQ-4:** Require Electrical Landscaping Equipment; **MM-AQ-5:** Require Green Consumer Products | Significant and Unavoidable | Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact-AQ-1:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of New School or Administrative Facilities. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction. | Significant and Unavoidable | **MM-AQ-1** through **MM-AQ-3** would reduce construction emissions; however, reductions cannot be quantified because the implementation of mitigation measures is dependent on the project type, and impacts may not be reduced to levels of significance below the thresholds. |
| **Impact-AQ-8:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction; **MM-AQ-4:** Require Electrical Landscaping Equipment; **MM-AQ-5:** Require Green Consumer Products | Significant and Unavoidable | Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. |
| **Impact-AQ-9:** Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel. | Significant and Unavoidable | Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction DPM emissions for major construction projects that do not meet the health risk screening criteria; however, the extent of the reductions is unknown. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-AQ-10:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction; **MM-AQ-4:** Require Electrical Landscaping Equipment; **MM-AQ-5:** Require Green Consumer Products. | Significant and Unavoidable | Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. |
| **Impact-AQ-20:** Potential to Result in Other Emissions (Such as Those Leading to Odors) Adversely Affecting a Substantial Number of People During Operation**.** | **MM-AQ-6:** Site New School Facilities Away from Odor-Generating Facilities. | Less than Significant | Implementation of **MM-AQ-6** would ensure that new schools would not be constructed within 1,000 feet of existing odor-generating facilities, which would reduce impacts to less than significant. |
| **Whole Site Modernization** | | | |
| **Impact-AQ-2:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of Whole Site Modernization Projects. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction. | Significant and Unavoidable | **MM-AQ-1** through **MM-AQ-3** would reduce construction emissions; however, reductions cannot be quantified because implementation of measures is dependent on the project type, and impacts may not be reduced to levels of significance below the thresholds. |
| **Impact-AQ-8:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During | Significant and Unavoidable | Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| School and Administrative Sites. | Construction; **MM-AQ-4:** Require Electrical Landscaping Equipment; **MM-AQ-5:** Require Green Consumer Products. | | |
| **Impact-AQ-9:** Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel. | Significant and Unavoidable | Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction DPM emissions for major construction projects that do not meet the health risk screening criteria; however, the extent of the reductions is unknown. |
| **Impact-AQ-10:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction; **MM-AQ-4:** Require Electrical Landscaping Equipment; **MM-AQ-5:** Require Green Consumer Products. | Significant and Unavoidable | Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. |
| **Upgrades of Existing School and Administrative Sites** | | | |
| **Impact-AQ-3:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of Upgrades of Existing School and Administrative Sites. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction. | Significant and Unavoidable | **MM-AQ-1** through **MM-AQ-3** would reduce construction emissions; however, reductions cannot be quantified because implementation of measures is dependent on the project type, and impacts may not be reduced to levels of significance below the thresholds. |
| **Impact-AQ-8:** Potential to Expose Sensitive Receptors to Substantial Criteria | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer | Significant and Unavoidable | Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| Pollutant Concentrations During Construction of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites. | Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction; **MM-AQ-4:** Require Electrical Landscaping Equipment; **MM-AQ-5:** Require Green Consumer Products. | | health risks associated with criteria air pollutants, but the extent of the reductions is unknown. |
| **Impact-AQ-9:** Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel. | Significant and Unavoidable | Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction DPM emissions for major construction projects that do not meet the health risk screening criteria; however, the extent of the reductions is unknown. |
| **Impact-AQ-10:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction**; MM-AQ-4:** Require Electrical Landscaping Equipment; **MM-AQ-5:** Require Green Consumer Products. | Significant and Unavoidable | Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| **Impact-AQ-4:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** | Significant and Unavoidable | **MM-AQ-1** through **MM-AQ-3** would reduce construction emissions; however, reductions cannot be quantified because implementation of measures is dependent on the project type, and |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| Standard During Construction of Joint-Use Facilities. | Require Low-Volatile Organic Compound Coatings During Construction. | | impacts may not be reduced to levels of significance below the thresholds. |
| **Impact-AQ-5:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Operation of Joint-Use Facilities. | **MM-AQ-4:** Require Electrical Landscaping Equipment; **MM-AQ-5:** Require Green Consumer Products. | Less than Significant | Implementation of **MM-AQ-4** and **MM-AQ-5** would eliminate area source emissions, and the net increase in emissions from joint-use facilities would be below Proposed Program thresholds. |
| **Impact-AQ-11:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of Joint-Use Facilities. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction; **MM-AQ-4:** Require Electrical Landscaping Equipment; **MM-AQ-5:** Require Green Consumer Products. | Significant and Unavoidable | Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. |
| **Impact-AQ-12:** Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of Joint-Use Facilities. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel. | Significant and Unavoidable | Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction DPM emissions for major construction projects that do not meet the health risk screening criteria; however, the extent of the reductions is unknown. |
| **Impact-AQ-13:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of Joint-Use Facilities. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** | Significant and Unavoidable | Joint-use facilities development could contribute a significant level of regional criteria pollutant emissions within the San Diego Air Basin, which could increase receptor |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | Require Low-Volatile Organic Compound Coatings During Construction; **MM-AQ-4:** Require Electrical Landscaping Equipment; **MM-AQ-5:** Require Green Consumer Products. | | exposure to air pollution and resultant health effects. |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| **Impact-AQ-2:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of Whole Site Modernization Projects. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction. | Significant and Unavoidable | **MM-AQ-1** through **MM-AQ-3** would reduce construction emissions; however, reductions cannot be quantified because implementation of measures is dependent on the project type, and impacts may not be reduced to levels of significance below the thresholds. |
| **Impact-AQ-17:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of Near-Term, Site-Specific Whole Site Modernization Projects. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction; **MM-AQ-4:** Require Electrical Landscaping Equipment; **MM-AQ-5:** Require Green Consumer Products. | Significant and Unavoidable | Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. |
| **Impact-AQ-18:** Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of Near-Term, Site-Specific Whole Site Modernization Projects. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel. | Significant and Unavoidable | Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction DPM emissions for major construction projects that do not meet the health risk screening criteria; however, the extent of the reductions is unknown. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-AQ-19:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of Near-Term, Site-Specific Whole Site Modernization Projects. | **MM-AQ-1:** Require Alternatively Fueled or Implement Newer Engines on Construction Equipment; **MM-AQ-2:** Require Construction Fleet to Use Renewable Diesel; **MM-AQ-3:** Require Low-Volatile Organic Compound Coatings During Construction; **MM-AQ-4:** Require Electrical Landscaping Equipment; **MM-AQ-5:** Require Green Consumer Products. | Significant and Unavoidable | Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. |

# 4.2.2 Existing Conditions

The Program area, described in Chapter 2, *Project Description*, is located within the San Diego Air Basin (SDAB), which comprises the study area for the Proposed Program and includes all school clusters. Ambient air quality is affected by climatological conditions, topography, and the types and amounts of pollutants emitted. The following sections describe the pollutants of concern and summarize how they move through the air, water, and soil within the air basin, and how air pollution is changed in the presence of other chemicals and particles. This section also summarizes local climate conditions, existing air quality conditions, and sensitive receptors that may be affected by Program-generated emissions.

## 4.2.2.1 Pollutants of Concern

### Criteria Pollutants

As described below, in Section 4.2.3, *Applicable Laws and Regulations,* the federal and state governments have established ambient air quality standards for six criteria pollutants: ozone, nitrogen dioxide ($NO_2$), carbon monoxide (CO), sulfur dioxide ($SO_2$), particulate matter (PM), and lead (Pb). Ozone is considered a regional pollutant because its precursors—volatile organic compounds (VOCs) and nitrogen oxides ($NO_X$)—combine to affect air quality on a regional scale. Pollutants such as $NO_2$, CO, $SO_2$, and Pb are considered local pollutants that tend to accumulate in the

air locally. Particulate matter is both a regional and local pollutant. The primary criteria pollutants generated by the Proposed Program are ozone precursors, CO, PM, and $SO_2$.[1, 2]

All criteria pollutants can have human health and environmental effects at certain concentrations. The ambient air quality standards for these pollutants (see Table 4.2-4 below) are established to maintain public health and the environment within an adequate margin of safety (Clean Air Act Section 109). Epidemiological, controlled human exposure, and toxicology studies evaluate potential health and environmental effects of criteria pollutants, and form the scientific basis for new and revised ambient air quality standards.

Principal characteristics and possible health and environmental effects from exposure to the primary criteria pollutants generated by the Proposed Program are discussed below.

## Ozone

Ozone, or smog, is photochemical oxidant that is formed when VOCs and $NO_X$ (both byproducts of the internal combustion engine) react with sunlight**.** VOCs are compounds made up primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Other sources of VOCs are emissions associated with the use of paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. The two major forms of $NO_X$ are nitric oxide (NO) and $NO_2$. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. $NO_2$ is a reddish-brown irritating gas formed by the combination of NO and oxygen. In addition to serving as an integral participant in ozone formation, $NO_X$ also directly acts as an acute respiratory irritant and increases susceptibility to respiratory pathogens due to impairments to the immune system.

Ozone poses a higher risk to those who already suffer from respiratory diseases (e.g., asthma), children, older adults, and people who are active outdoors. Exposure to ozone at certain concentrations can make breathing more difficult, cause shortness of breath and coughing, inflame and damage the airways, aggregate lung diseases, increase the frequency of asthma attacks, and cause chronic obstructive pulmonary disease. Studies show associations between short-term ozone exposure and non-accidental mortality, including deaths from respiratory issues. Studies also suggest long-term exposure to ozone may increase the risk of respiratory-related deaths (U.S. Environmental Protection Agency 2019a). The concentration of ozone at which health effects are observed depends on an individual's sensitivity, level of exertion (i.e., breathing rate), and duration of exposure. Studies show large individual differences in the intensity of symptomatic responses, with one study finding no symptoms in the least responsive individual after a 2-hour exposure to 400 parts per billion (ppb) of ozone and a 50% decrement in forced airway volume in the most responsive individual. Although the results vary, evidence suggests that sensitive populations (e.g., asthmatics) may be affected on days when the 8-hour maximum ozone concentration reaches 80 ppb (U.S. Environmental Protection Agency 2016). In 2016, the average background 1-hour and

[1] There are also ambient air quality standards for Pb, sulfates, hydrogen sulfide, vinyl chloride, and visibility particulates. However, these pollutants are typically associated with industrial sources, which are not included as part of the Proposed Program. Accordingly, they are not evaluated further.

[2] Most emission of $NO_X$ are in the form of nitric oxide (NO) (Reşitoğlu 2018). Conversion to $NO_2$ occurs in the atmosphere as pollutants disperse downwind. Accordingly, $NO_2$ is not considered a local pollutant of concern for the Proposed Program and is not evaluated further.

8-hour ozone levels were 95 and 79 ppb, respectively (San Diego Air Pollution Control District 2016).

In addition to human health effects, ozone has been tied to crop damage, typically in the form of stunted growth, leaf discoloration, cell damage, and premature death. Ozone can also act as a corrosive and oxidant, resulting in property damage such as the degradation of rubber products.

## Carbon Monoxide

Carbon monoxide is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. In the study area, high CO levels are of greatest concern during the winter, when periods of light winds combine with the formation of ground-level temperature inversions from evening through early morning. These conditions trap pollutants near the ground, reducing the dispersion of vehicle emissions. Moreover, motor vehicles exhibit increased CO emission rates at low air temperatures. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation. Exposure to CO at high concentrations can also cause fatigue, headaches, confusion, dizziness, and chest pain. There are no ecological or environmental effects from ambient CO (California Air Resources Board 2019a).

## Particulate Matter

PM consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of particulates are now generally considered: respirable particles with an aerodynamic diameter of 10 micrometers or less, or PM10, and fine particles with an aerodynamic diameter of 2.5 micrometers or less, or PM2.5. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. However, wind on arid landscapes also contributes substantially to local particulate loading.

Particulate pollution can be transported over long distances, and both PM10 and PM2.5 may adversely affect people, especially for those who are naturally sensitive or susceptible to breathing problems. Numerous studies have linked PM exposure to premature death in people with preexisting heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lunch function, and increased respiratory symptoms. Depending on its composition, both PM10 and PM2.5 can also affect water quality and acidity, deplete soil nutrients, damage sensitive forests and crops, affect ecosystem diversity, and contribute to acid rain (U.S. Environmental Protection Agency 2018a).

## Sulfur Dioxide

Sulfur dioxide is generated by the burning of fossil fuels, industrial processes, and natural sources, such as volcanoes. In recent years, emissions of $SO_2$ have been significantly reduced by the increasingly stringent controls placed on the sulfur content of fuels used in stationary and mobile sources. $SO_2$ is a precursor to fine PM formation in the form of sulfates, such as ammonium sulfate. Short-term exposure to $SO_2$ can aggravate the respiratory system, making breathing difficult. Controlled laboratory studies indicate that brief exposure (5 to 10 minutes) of exercising asthmatics to an average $SO_2$ level of 0.4 parts per million (ppm) can result in increases in air resistance. Healthy adults do not show any symptoms from $SO_2$ at levels as high 1 ppm, even after up to 3 hours of exposure. $SO_2$ can also affect the environment by damaging foliage and decreasing plant growth (U.S. Environmental Protection Agency 2019b).

## Toxic Air Contaminants

Although ambient air quality standards have been established for criteria pollutants, none exist for toxic air contaminants (TACs). Many pollutants are identified as TACs because of their potential to increase the risk of developing cancer or because of their acute or chronic health risks. For TACs that are known or suspected carcinogens, the California Air Resources Board (CARB) has consistently found that there are no levels or thresholds below which exposure is risk-free (California Air Resources Board 2019b). Individual TACs vary greatly in the risks they present. At a given level of exposure, one TAC may pose a hazard that is many times greater than another. TACs are identified and their toxicity is studied by the California Office of Environmental Health Hazard Assessment (OEHHA) The primary TACs of concern associated with the project are diesel particulate matter (DPM) and asbestos, both of which are discussed below.

### Diesel Particulate Matter

DPM is generated by diesel-fueled equipment and vehicles. Short-term exposure to DPM can cause acute irritation (e.g., eye, throat, and bronchial), neurophysiological symptoms (e.g., lightheadedness and nausea), and respiratory symptoms (e.g., cough and phlegm). The United States Environmental Protection Agency (EPA) (2002) has also determined that diesel exhaust is "likely to be carcinogenic to humans by inhalation".

### Asbestos

Asbestos is the name given to several naturally occurring fibrous silicate minerals. Before the adverse health effects of asbestos were identified, asbestos was widely used as insulation and fireproofing in buildings, and it can still be found in some older buildings. It is also found in its natural state in rock or soil. The inhalation of asbestos fibers into the lungs can result in a variety of adverse health effects, including inflammation of the lungs, respiratory ailments (e.g., asbestosis, which is scarring of lung tissue that results in constricted breathing), and cancer (e.g., lung cancer and mesothelioma, which is cancer of the linings of the lungs and abdomen).

## Odors

Offensive odors can be unpleasant and can lead to citizen complaints to local governments and air districts. According to CARB's (2005) *Air Quality and Land Use Handbook*, land uses associated with odor complaints typically include sewage treatment plants, landfills, recycling facilities, manufacturing, and agricultural activities. CARB provides recommended screening distances for siting new receptors near existing odor sources.

# 4.2.2.2 Climate and Meteorology

Climate in Southern California, including the SDAB, is controlled largely by the strength and position of subtropical high-pressure cells over the Pacific Ocean. Most precipitation is limited to a few storms during the winter season. Winds in the vicinity of the project site are usually driven by the dominant land/sea breeze circulation system. Temperature inversions, which can trap air pollutants near the ground, are common during the summer months when daytime winds are light. Wind patterns can also concentrate and carry pollutants from nearby areas, most notably Los Angeles, thereby adding to the local pollutant mix.

The average maximum daily summertime and wintertime temperatures in the city of San Diego are in the mid-70s and 60s, respectively. The average minimum daily summertime and wintertime temperatures in the city are in the mid-60s and high 40s, respectively (Weather Channel 2019). Annual precipitation ranges from approximately 10 inches at the coast to approximately 13 inches in inland areas of the city. Precipitation occurs mostly during the winter months; it is relatively infrequent during the summer (Western Regional Climate Center 2019).

# 4.2.2.3 Existing Air Quality Conditions

## Ambient Criteria Pollutant Concentrations

Several ambient air quality monitoring stations in the SDAB monitor progress toward achieving and maintaining the federal and state air quality standards. Table 4.2-2 summarizes the average criteria pollutant concentrations in the SDAB for the last 3 years for which complete data was available (2016–2018). CO and $SO_2$ data at the air basin level was unavailable so data from all monitoring stations within the air basin was reviewed, and the highest concentration was presented for each year. The highest CO concentrations were reported at the 1110 Beardsley Street monitoring station in 2016 and at the 11403 Rancho Carmel Drive monitoring station in 2017 and 2018. The highest $SO_2$ concentrations were reported at the 10537 Floyd Smith Drive monitoring station in 2016 and at the 533 First Street monitoring station in 2017 and 2018. Table 4.2-2 shows the SDAB experienced violations of the federal and state ozone, federal PM2.5, and state PM10 standards. Federal and state standards for the other pollutants were not exceeded. Existing violations of the ozone and PM ambient air quality standards indicate that certain individuals exposed to this pollutant may experience certain health effects, including increased incidence of cardiovascular and respiratory ailments. Note that at the time of analysis, 2019 data was not yet available.

**Table 4.2-2. Ambient Background Concentrations in the San Diego Air Basin**

| Pollutant Standards | 2016 | 2017 | 2018 |
|---|---|---|---|
| **Ozone** | | | |
| Maximum 1-hour concentration (ppm) | 0.104 | 0.109 | 0.102 |
| Maximum 8-hour concentration (ppm) | 0.091 | 0.095 | 0.082 |
| Number of days standard exceeded[1] | | | |
| CAAQS 1-hour (>0.09 ppm) | 7 | 13 | 3 |
| CAAQS 8-hour (>0.070 ppm) | 13 | 28 | 8 |
| NAAQS 8-hour (>0.070 ppm | 34 | 54 | 23 |
| **Carbon Monoxide** | | | |
| Maximum 8-hour concentration (ppm) | 1.7 | 1.5 | 1.4 |
| Maximum 1-hour concentration (ppm) | 2.2 | 1.9 | 1.9 |
| Number of days standard exceeded[1] | | | |
| NAAQS 8-hour (>9 ppm) | 0 | 0 | 0 |
| CAAQS 8-hour (>9.0 ppm) | 0 | 0 | 0 |
| NAAQS 1-hour (>35 ppm) | 0 | 0 | 0 |

| Pollutant Standards | 2016 | 2017 | 2018 |
|---|---|---|---|
| CAAQS 1-hour (>20 ppm) | 0 | 0 | 0 |
| **Nitrogen Dioxide** | | | |
| State maximum 1-hour concentration (ppb) | 73 | 74 | 56 |
| State second-highest 1-hour concentration (ppb) | 72 | 63 | 54 |
| Annual average concentration (ppb) | 17 | 16 | 15 |
| Number of days standard exceeded[1] | | | |
| CAAQS 1-hour (180 ppb) | 0 | 0 | 0 |
| NAAQS 1-hour (0.100 ppm) | 0 | 0 | 0 |
| **Particulate Matter (PM10)** | | | |
| National[2] maximum 24-hour concentration (μg/m$^3$) | 79.0 | 68.0 | 55.0 |
| National[2] second-highest 24-hour concentration (μg/m$^3$) | 66.0 | 67.0 | 54.0 |
| State[3] maximum 24-hour concentration (μg/m$^3$) | 79.0 | 69.0 | 55.0 |
| State[3] second-highest 24-hour concentration (μg/m$^3$) | 65.0 | 65.0 | 53.0 |
| National annual average concentration (μg/m$^3$) | 31.4 | 26.9 | 26.3 |
| State annual average concentration (μg/m$^3$)[4] | 31.3 | 26.9 | 26.2 |
| Number of days standard exceeded[1,5] | | | |
| NAAQS 24-hour (>150 μg/m$^3$) *estimated* | 0.0 | 0.0 | 0.0 |
| CAAQS 24-hour (>50 μg/m$^3$) | 9 | 4 | 3 |
| **Particulate Matter (PM2.5)** | | | |
| National[6] maximum 24-hour concentration (μg/m$^3$) | 34.4 | 42.7 | 41.9 |
| National[6] second-highest 24-hour concentration (μg/m$^3$) | 29.1 | 32.1 | 32.4 |
| State[7] maximum 24-hour concentration (μg/m$^3$) | 42.1 | 42.7 | 50.8 |
| State[7] second-highest 24-hour concentration (μg/m$^3$) | 3.8 | 37.3 | 40.0 |
| National annual average concentration (μg/m$^3$) | 8.7 | 9.6 | 10.0 |
| State annual average concentration (μg/m$^3$) | 12.8 | 9.6 | 10.5 |
| Number of days standard exceeded[1] | | | |
| NAAQS 24-hour (>35 μg/m$^3$) | 0 | 1 | 1 |
| **Sulfur Dioxide ($SO_2$)** | | | |
| Maximum concentration 1-hour (ppb) | 0.0018 | 0.001 | 0.0035 |
| Maximum concentration 24-hour (ppm) | 0.0005 | 0.0004 | 0.0004 |
| Number of days standard exceeded[1] | | | |
| NAAQS 1-hour (0.075 ppm) | 0 | 0 | 0 |
| CAAQS 1-hour (0.25 ppm) | 0 | 0 | 0 |
| NAAQS 24-hour (0.014 ppm) | 0 | 0 | 0 |
| CAAQS 24-hour (0.04 ppm) | 0 | 0 | 0 |

| Pollutant Standards | 2016 | 2017 | 2018 |
|---|---|---|---|

Source: California Air Resources Board 2019c, U.S. Environmental Protection Agency 2018b.
[1] An exceedance is not necessarily related to a violation of the standard.
[2] National statistics are based on standard conditions data. In addition, national statistics are based on samplers using federal reference or equivalent methods.
[3] State statistics are based on approved local samplers and local conditions data.
[4] State criteria for ensuring that data are sufficiently complete for calculating valid annual averages are more stringent than the national criteria.
[5] Measurements usually are collected every 6 days.
[6] National statistics are based on samplers using federal reference or equivalent methods.
[7] State statistics are based on local approved samplers.
Note: The concentrations presented above for the air basin include data from monitoring stations outside the city.
µg/m$^3$ = micrograms per cubic meter; CAAQS = California Ambient Air Quality Standards; mg/m$^3$ = milligrams per cubic meter; NAAQS = National Ambient Air Quality Standards; ppm = parts per million

## Regional Attainment Status

Local monitoring data (Table 4.2-2) are used to designate areas as nonattainment, maintenance, attainment, or unclassified for the ambient air quality standards. The four designations are further defined as shown below.

- Nonattainment—assigned to areas where monitored pollutant concentrations consistently violate the standard in question.
- Maintenance—assigned to areas where monitored pollutant concentrations exceeded the standard in question in the past but are no longer in violation of that standard.
- Attainment—assigned to areas where pollutant concentrations meet the standard in question over a designated period of time.
- Unclassified—assigned to areas where data are insufficient to determine whether a pollutant is violating the standard in question.

Table 4.2-3 summarizes the attainment status of the Program area in San Diego County.

**Table 4.2-3. Federal and State Ambient Air Quality Attainment Status for San Diego County**

| Criteria Pollutant | Federal Designation | State Designation |
|---|---|---|
| Ozone (8-hour) | Nonattainment | Nonattainment |
| Ozone (1-hour) | Attainment[1] | Nonattainment |
| Carbon Monoxide | Attainment | Attainment |
| Particulate Matter (PM10) | Unclassifiable[2] | Nonattainment |
| Particulate Matter (PM2.5) | Attainment | Nonattainment |
| Nitrogen Dioxide | Attainment | Attainment |
| Sulfur Dioxide | Attainment | Attainment |
| Lead | Attainment | Attainment |
| Sulfates | (No Federal Standard) | Attainment |
| Hydrogen Sulfide | (No Federal Standard) | Unclassified |
| Visibility Reducing Particles | (No Federal Standard) | Unclassified |

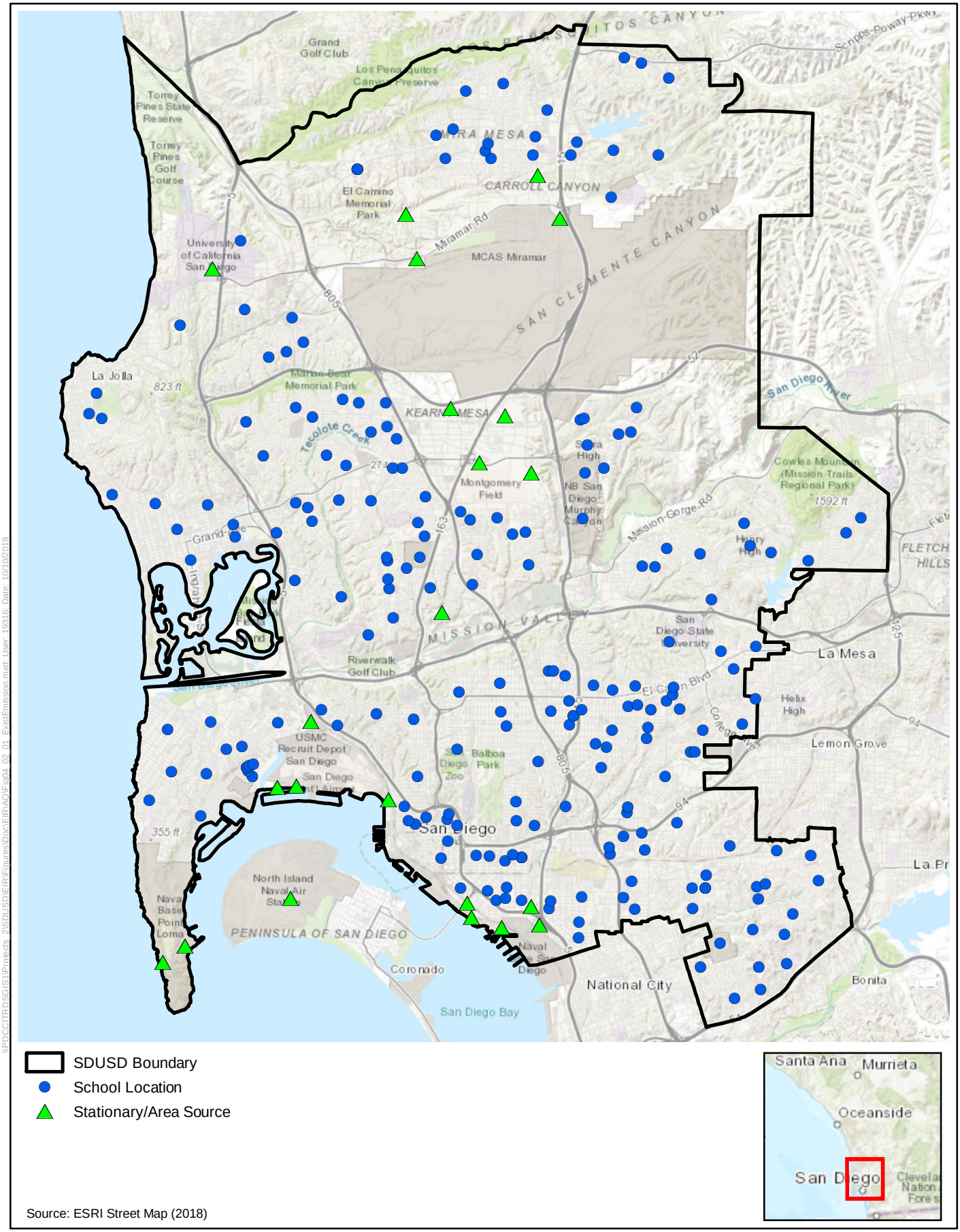
Source: San Diego Air Pollution Control District 2019a.

[1] The federal 1-hour standard of 12 parts per hundred million was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.

[2] At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

## Sensitive Receptors

Sensitive land uses are defined as locations where human populations, especially children, seniors, and sick persons, are located and where there is reasonable expectation of continuous human exposure according to the averaging period for the air quality standards (i.e., 24-hour, 8-hour). Typical sensitive receptors are residences, hospitals, schools, and parks (California Air Resources Board 2005). The Proposed Program includes existing and new school sites in an urban environment, generally within developed neighborhoods that include residential land uses, daycare facilities, elder-care facilities, hospitals, and parks. In addition, students who attend the existing schools during construction would be considered sensitive receptors for the purposes of this analysis because existing students would remain on site during construction. Figure 4.2-1 shows the location of District schools relative to the major roadways and the permitted sources with the reported health risks by CARB (2017). Though not shown in the figure, residences, daycare facilities, hospitals, elder-care facilities, and stationary sources with no published health risk data are also assumed to be located throughout the Program area and could be affected by the Proposed Program.


SDUSD Boundary
School Location
Stationary/Area Source
Source: ESRI Street Map (2018)
0 1 2
Miles
N
ICF
Figure 4.2-1
Existing Emission Sources

# 4.2.3 Applicable Laws and Regulations

The federal Clean Air Act (CAA) and its subsequent amendments form the basis for the nation's air pollution control effort. EPA is responsible for implementing most aspects of the CAA. A key element of the CAA is the National Ambient Air Quality Standards (NAAQS) for criteria pollutants. The CAA delegates enforcement of the NAAQS to the states. In California, CARB is responsible for enforcing air pollution regulations and ensuring the NAAQS and California Ambient Air Quality Standards (CAAQS) are met. CARB, in turn, delegates regulatory authority for stationary sources and other air quality management responsibilities to local air agencies. The San Diego Air Pollution Control District (SDAPCD) is the local air agency for the Program area. The following sections provide an overview of federal, state, and local air quality regulations that apply to the Proposed Program.

## 4.2.3.1 Federal

### Clean Air Act and National Ambient Air Quality Standards

The CAA was first enacted in 1963 and has been amended numerous times in subsequent years (1965, 1967, 1970, 1977, and 1990). The CAA establishes federal air quality standards, known as NAAQS, for six criteria pollutants and specifies future dates for achieving compliance. The CAA also mandates that the states submit and implement a State Implementation Plan (SIP) for local areas not meeting those standards. The plans must include pollution control measures that demonstrate how the standards will be met.

The 1990 amendments to the CAA identify specific emission-reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or meet interim milestones. Table 4.2-4 shows the NAAQS currently in effect for each criteria pollutant, as well as the CAAQS (discussed further below).

**Table 4.2-4. Federal and State Ambient Air Quality Standards**

| Criteria Pollutant | Average Time | California Standards | National Standards[1] | |
|---|---|---|---|---|
| | | | Primary | Secondary |
| Ozone | 1-hour | 0.09 ppm | None[1] | None[2] |
| | 8–hour | 0.070 ppm | 0.070 ppm | 0.070 ppm |
| Particulate Matter (PM10) | 24-hour | 50 μg/m$^3$ | 150 μg/m$^3$ | 150 μg/m$^3$ |
| | Annual mean | 20 μg/m$^3$ | None | None |
| Fine Particulate Matter (PM2.5) | 24-hour | None | 35 μg/m$^3$ | 35 μg/m$^3$ |
| | Annual mean | 12 μg/m$^3$ | 12.0 μg/m$^3$ | 15 μg/m$^3$ |
| Carbon Monoxide | 8-hour | 9.0 ppm | 9 ppm | None |
| | 1-hour | 20 ppm | 35 ppm | None |
| Nitrogen Dioxide | Annual mean | 0.030 ppm | 0.053 ppm | 0.053 ppm |
| | 1-hour | 0.18 ppm | 0.100 ppm | None |
| Sulfur Dioxide[3] | Annual mean | None | 0.030 ppm | None |
| | 24-hour | 0.04 ppm | 0.014 ppm | None |
| | 3-hour | None | None | 0.5 ppm |
| | 1-hour | 0.25 ppm | 0.075 ppm | None |
| Lead | 30-day average | 1.5 μg/m$^3$ | None | None |
| | Calendar quarter | None | 1.5 μg/m$^3$ | 1.5 μg/m$^3$ |
| | 3-month average | None | 0.15 μg/m$^3$ | 0.15 μg/m$^3$ |
| Sulfates | 24-hour | 25 μg/m$^3$ | None | None |
| Visibility-reducing Particles | 8-hour | --[4] | None | None |
| Hydrogen Sulfide | 1-hour | 0.03 ppm | None | None |
| Vinyl Chloride | 24-hour | 0.01 ppm | None | None |

Source: California Air Resources Board 2016.

[1] National standards are divided into primary and secondary standards. Primary standards are intended to protect public health, whereas secondary standards are intended to protect public welfare and the environment.

[2] The federal 1-hour standard of 12 parts per hundred million was in effect from 1979 through June 15, 2005. The revoked standard is referenced because it was employed for such a long period and is a benchmark for State Implementation Plans.

[3] The annual and 24-hour NAAQS for sulfur dioxide only apply for 1 year after designation of the new 1-hour standard to those areas that were previously in nonattainment for 24-hour and annual NAAQS.

[4] CAAQS for visibility-reducing particles is defined by an extinction coefficient of 0.23 per kilometer – visibility of 10 miles or more due to particles when relative humidity is less than 70%.

ppm= parts per million; μg/m$^3$ = micrograms per cubic meter; NAAQS = National Ambient Air Quality Standard; CAAQS = California Ambient Air Quality Standard

## Emission Standards for Non-Road Diesel Engines

To reduce emissions from non-road diesel equipment, EPA established a series of increasingly strict emission standards for new non-road diesel engines, including off-road equipment. Tier 1 standards were phased in on newly manufactured equipment from 1996 through 2000 (year of manufacture), depending on the engine horsepower (hp) category. Tier 2 standards were phased in on newly manufactured equipment from 2001 through 2006. Tier 3 standards were phased in on newly manufactured equipment from 2006 through 2008. Tier 4 standards, which require advanced emission control technology, were phased in from 2008 through 2015.

## Corporate Average Fuel Economy Standards

The Corporate Average Fuel Economy (CAFÉ) standards were first enacted in 1975 to improve the average fuel economy of cars and light duty trucks. The National Highway Traffic Safety Administration (NHTSA) sets the CAFÉ standards, which are regularly updated to require additional improvements in fuel economy. The standards were last updated in October 2012 to apply to new passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2017 through 2025, and are equivalent to 54.5 miles per gallon.

However, On August 2, 2018, NHTSA and EPA proposed to amend the fuel efficiency standards for passenger cars and light trucks and establish new standards covering model years 2021 through 2026 by maintaining the current model year 2020 standards through 2026 (Safer Affordable Fuel-Efficient [SAFE] Vehicles Rule). On September 19, 2019, EPA and NHTSA issued a final action on the One National Program Rule, which is consider part 1 of the SAFE Vehicles Rule and a precursor to the proposed fuel efficiency standards. The One National Program Rule enables EPA/NHTSA to provide nationwide uniform fuel economy and greenhouse gas (GHG) vehicle standards, specifically by (1) clarifying that federal law preempts state and local tailpipe GHG standards, (2) affirming NHTSA's statutory authority to set nationally applicable fuel economy standards, and (3) withdrawing California's CAA preemption waiver to set state-specific standards.

EPA and NHTSA published their decisions to withdraw California's waiver and finalize regulatory text related to the preemption on September 27, 2019 (84 *Federal Register* 51310). The agencies also announced that they will later publish the second part of the SAFE Vehicles Rule (i.e., the standards). California, 22 other states, the District of Columbia, and two cities filed suit against the proposed One National Program Rule on September 20, 2019 (*California et al. v. United States Department of Transportation et al*., 1:19-cv-02826, U.S. District Court for the District of Columbia). The lawsuit requests a "permanent injunction prohibiting Defendants from implementing or relying on the Preemption Regulation," but does not stay its implementation during legal deliberations. Part 1 of the SAFE Vehicles Rule went into effect on November 26, 2019, and Part 2 went into effect on March 30, 2020.

## Non-Road Diesel Fuel Rule

With this rule, EPA set sulfur limitations for non-road diesel fuel, including off-road equipment and trucks. For the Proposed Program, this rule affects the diesel-powered equipment and off-highway trucks used during construction. Under this rule, the diesel fuel was limited to 500 ppm starting June 1, 2007, and further limited to 15 ppm sulfur content (ultra-low-sulfur diesel) starting January 1, 2010, for non-road fuel.

## On-Road Diesel Fuel Standards

Beginning in 2006, EPA began to phase-in more stringent regulations to lower the amount of sulfur in diesel fuel to 15 ppm in on-road vehicles. From 2006 to 2010, ultra-low sulfur diesel was phased in for on-road diesel. After 2010, EPA's diesel standards required that all highway diesel fuel supplied to the market be ultra-low sulfur diesel and that all highway diesel vehicles must use ultra-low sulfur diesel.

### On-Road Diesel Engine Rule

In December 2000, the EPA signed the Heavy-Duty Highway Rule, which reduces emissions from on-road, heavy-duty diesel trucks by establishing a series of increasingly strict emission standards for new engines. Manufacturers are required to produce new diesel vehicles that meet PM and $NO_X$ emission standards beginning with model year 2007 and phased-in between 2007 and 2010. The phase-in is based on a percent-of-sales basis: 50% from 2007 to 2009 and 100% in 2010 (EPA 2000).

### Federal Hazardous Air Pollutant Regulations

The CAA identified 188 pollutants as being air toxics, which are also known as hazardous air pollutants (HAP). From this list, the EPA identified a group of 93 as mobile source air toxics (MSAT) in its final rule, Control of Emissions of Hazardous Air Pollutants from Mobile Sources (66 *Federal Register* 17235) in March 2001. From this list of 21 MSATs, the EPA has identified nine MSATs (1,3-butadiene, acetaldehyde, acrolein, benzene, DPM, ethylbenzene, formaldehyde, naphthalene, and polycyclic organic matter) as being priority MSATs. To address emissions of MSATs, the EPA has issued a number of regulations that have decreased, and will continue to decrease, MSATs through cleaner fuels and cleaner engines.

## 4.2.3.2 State

### California Clean Air Act and California Ambient Air Quality Standards

In 1988, the state legislature adopted the California Clean Air Act (CCAA), which established a statewide air pollution control program. The CCAA requires all air districts in the state to endeavor to meet the CAAQS by the earliest practical date. Unlike the CAA, the CCAA does not set precise attainment deadlines. Instead, the CCAA establishes increasingly stringent requirements for areas that will require more time to achieve the standards. CAAQS are generally more stringent than NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, visibility-reducing particles, and vinyl chloride. The CAAQS and NAAQS are shown in Table 4.2-4.

CARB and local air districts bear responsibility for meeting the CAAQS, which are to be achieved through district-level air quality management plans incorporated into the SIP. In California, EPA has delegated authority to prepare SIPs to CARB, which, in turn, has delegated that authority to individual air districts. CARB traditionally has established state air quality standards, maintaining oversight authority in air quality planning, developing programs for reducing emissions from motor vehicles, developing air emission inventories, collecting air quality and meteorological data, and approving SIPs.

The CCAA substantially adds to the authority and responsibilities of air districts. The CCAA designates air districts as lead air quality planning agencies, requires air districts to prepare air quality plans, and grants air districts authority to implement transportation control measures. The CCAA also emphasizes the control of "indirect and area-wide sources" of air pollutant emissions. The CCAA gives local air pollution control districts explicit authority to regulate indirect sources of air pollution and to establish traffic control measures.

## Statewide Truck and Bus Regulation

Originally adopted in 2005, the truck and bus regulation requires heavy duty trucks and school buses to be retrofitted with PM filters. The regulation applies to privately and federally owned diesel-fueled trucks and publicly and privately owned school buses with a gross vehicle weight rating greater than 14,000 pounds. Compliance with the regulation can be reached through one of two paths: (1) vehicle retrofits according to engine year or (2) phase-in schedule. Compliance paths ensure that by January 2023, nearly all trucks and buses will have 2010 model year engines or newer. More specifically, heavier trucks (e.g., construction trucks) are required to have a PM filter or were required to have been replaced by January 2015 (older models). School buses must have a level 3 PM filter or an original equipment manufactured PM filter that most commonly comes installed on 2007 model year and newer engines. As of January 1, 2012, school buses manufactured before April 1, 1977, can no longer operate in California.

## Statewide Non-Road Diesel Engines

Like the EPA at the federal level, CARB has established a series of increasingly strict emission standards for new non-road diesel engines, including off-road diesel equipment and trucks operating in California. New equipment used during Proposed Program construction would be required to comply with the standards, which require advanced emission control technology. Emission standards adopted (e.g., Tier 4) are nearly identify to those finalized by the EPA for non-road diesel engines.

## On-Road Heavy-Duty Diesel Vehicle Idling Emission Reduction Regulation

CARB adopted this airborne toxic control measure in 2005 to limit diesel-fueled commercial motor vehicle idling. This regulation states that diesel vehicles with a gross vehicle weight rating greater than 10,000 pounds shall not idle the vehicle's diesel-powered primary or auxiliary power system for greater than 5 minutes at any location (13 California Code of Regulations [CCR] Title 13, Section 1956.8 and 2485). This regulation applies to all trucks used during construction.

## Carl Moyer Program

The Carl Moyer Memorial Air Quality Standards Attainment Program (Carl Moyer Program) is a voluntary program that offers grants to owners of heavy-duty vehicles and equipment. The program is a partnership between CARB and the local air districts throughout the state to reduce air pollution emissions from heavy-duty engines. Heavy-duty vehicles and equipment used to implement the Proposed Program would be eligible for the Carl Moyer Program. Locally, the air districts administer the Carl Moyer Program.

## Toxic Air Contaminant Regulations

California regulates TACs primarily through the Toxic Air Contaminant Identification and Control Act (Tanner Act) and the Air Toxics "Hot Spots" Information and Assessment Act of 1987 ("Hot Spots" Act; Assembly Bill 255, 187). In the early 1980s, CARB established a statewide comprehensive air toxics program to reduce exposure to air toxics. The Tanner Act created California's program to reduce exposure to air toxics. The "Hot Spots" Act supplements the Tanner Act by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks.

CARB has identified DPM as a TAC and has approved a comprehensive Diesel Risk Reduction Plan to reduce emissions from both new and existing diesel-fueled engines and vehicles. The goal of the plan is to reduce DPM emissions and the associated health risk by 75% by 2010 and by 85% by 2020. The plan identifies 14 measures that CARB will implement over the next several years. The Proposed Program would be required to comply with any applicable diesel control measures from the Diesel Risk Reduction Plan.

### Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools

In 2002, CARB adopted the Airborne Toxic Control Measure (ATCM), designed to reduce DPM emissions by limiting school bus idling and idling at or near schools to only when necessary for safety or operational concerns (13 CCR 2480). At school sites, buses and commercial motor vehicle drivers are required to turn off their engines upon arriving at a school and restart them no more than 30 seconds before departing. When within 100 feet of a school, school bus drivers are required to turn off their engines and restart them no more than 30 seconds before departing. Moreover, transit buses and commercial motor vehicles are prohibited from idling for more than 5 minutes. At locations beyond 100 feet of a school, such as school bus stops or at school activity destinations, school bus drivers are prohibited from idling more than 5 minutes, consistent with other ATCMs for diesel vehicles (13 CCR 2485). In 2009, Senate Bill 124 (Oropeza [SB 124]) acknowledged and codified CARB's ATCM for limiting school bus idling, raising the minimum penalty for a violation of this rule from $100 to $300.

## Advisory Recommendations on Siting New Schools

CARB has developed advisory recommendations for siting new schools near certain types of pollution sources. These recommendations include the avoiding siting new schools within 500 feet of a freeway, 1,000 feet of a major service and maintenance rail yard, and 300 feet of a large gas station (California Air Resources Board 2005). In addition, CARB has identified some of the most common sources of odor complaints, ranging from small commercial facilities (e.g., autobody shops) to large industrial facilities (e.g., landfills, sewage treatment plants, recycling facilities). Although the SDAPCD does have recommended odor screening distances, several districts across the state (e.g., Bay Area Air Quality Management District, Sacramento Metropolitan Air Quality Management District) have developed screening distances to assist with the review of odor-generating land use to limit impacts on sensitive receptors.

## California Department of Education School Site Selection

Education Code Section 17251 and 5 CCR 14001 through 14012 outline the powers and duties of the California Department of Education regarding school sites and the construction of new school buildings. School districts seeking state funding must comply with the Education Code and CCR Title 5 sections. Site approval from the California Department of Education must be granted prior to the apportioning of funds, and typically includes a rigorous site selection process that includes reviewing health and safety factors such as health hazards (e.g., proximity to major roadways, hazardous air emission and facilities within a quarter mile).

# 4.2.3.3 Local

## San Diego Unified School District

The District is focused on reducing its criteria air pollutant emissions and health risks associated with asbestos. For instance, the District has prepared several guidance documents to guide current and future facilities under the Proposed Program; for example, their *Standards for New Construction, Additions, and Remodels* includes guidelines for site improvements and landscaping to reduce area emissions (District 2016). The District's *Educational Specifications* also reinforces the District's goals for sustainability as it relates to non-toxic and zero VOC products (District n.d.). Other improvements with air quality benefits include planting of native and low water usage plants to reduce landscaping requirements and watering needs, planting replacement trees, and reducing waste on school properties to reduce transport-related emissions. Please see Section 4.7, *Greenhouse Gas Emissions,* for additional details on the District's sustainability initiatives by sector. In addition, the District has requirements for the removal and disposal of asbestos-containing materials (ACMs). Construction specifications issued to contractors by the District provide contractors with reference documents and materials that outline how ACMs should be removed and disposed of per EPA, SDAPCD, Office of Safety and Health Administration, National Institute for Occupational Safety and Health, and the State of California.

## San Diego Air Pollution Control District

SDAPCD has local air quality jurisdiction over projects in San Diego County. Responsibilities of the air district include overseeing stationary-source emissions, approving permits, maintaining emissions inventories, maintaining air quality stations, and overseeing agricultural burning permits. SDAPCD is also responsible for establishing and enforcing local air quality rules and regulations that address the requirements of federal and state air quality laws and ensuring that the NAAQS and CAAQS are met.

SDAPCD has adopted air quality plans to improve air quality, protect public health, and protect the climate, and rules and regulations to enforce these plans. The San Diego Regional Air Quality Strategy (RAQS) identifies feasible emissions control measures and provides expeditious progress toward attaining the state ozone standards while San Diego's portions of the SIP are designed to attain and maintain federal standards. The RAQS is updated on a triennial basis, most recently in December 2016. The most recent SIP documents are the *Ozone Attainment Plan* and the *Reasonable Available Control Technology Demonstration* developed for the 2008 $O_3$ NAAQS (0.075 ppm). The SDAPCD has yet to adopt a plan for the 2015 $O_3$ NAAQS (0.070 ppm). A draft update to the RAQS, which includes a plan for the 2015 $O_3$ NAAQS, was released in July 2020 but has not been adopted.

The Proposed Program may be subject to the SDAPCD rules outlined below. This list may not be all encompassing because additional SDAPCD rules may apply to the Proposed Program as specific components are identified.

- **Regulation 2, Rule 20.2—New-Source Review (NSR) of Non-Major Stationary Sources:** Establishes air quality impact analysis (AQIA) trigger levels, which set emissions limits for non-major new or modified stationary sources.
- **Rule 50—Visible Emissions:** Establishes limits to the opacity of emissions within the SDAPCD. The proposed facility, which would be subject to Rule 50(d)(1) and (6), should not exceed the visible emissions limitation that Rule 50.1 requires.

- **Rule 51—Nuisance:** Prohibits emissions that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public or endanger the comfort, repose, health, or safety of any such persons or the public or cause injury or damage to businesses or property.
- **Rule 52—Particulate Matter:** Establishes limits to the discharge of any PM from non-stationary sources.
- **Rule 54—Dust and Fumes:** Establishes limits to the amount of dust or fumes discharged into the atmosphere in any 1 hour.
- **Rule 55— Fugitive Dust Control:** Sets restrictions on visible fugitive dust from construction and demolition projects.
- **Rule 67—Architectural Coatings:** Establishes limits to the VOC content of coatings applied within the SDAPCD.
- **Rule 67.7—Cutback and Emulsified Asphalts:** Establishes general provisions and limits to the VOC content of asphalt materials applied within the SDAPCD.
- **Regulation XI—National Emissions Standards for Hazardous Air Pollutants (NESHAP):** Sets standards and requirements for various air pollutants. Specifically, Rule 361.145, Standard for Demolition and Renovation, sets forth notification and emissions control requirements for building demolition activities that occur in the presence of regulated ACMs.
- **Regulation XII, Rules 1200–1210:** Establishes rules and procedures governing new, relocated, or modified emissions units that may increase emissions of one or more TAC.

The SDAPCD has historically offered grant programs and assistance for agencies that replace or retrofit school buses. The Voucher Incentive Program, Lower Emissions School Bus Program, and Tank Replacement Incentive Program have helped agencies retrofit or purchase new school buses that are currently in use in the region (San Diego Air Pollution Control District 2019b).

# 4.2.4 Impact Analysis

## 4.2.4.1 Methodology

The Proposed Program includes the construction of new schools as well as various repair, renovation, and revitalization improvements at existing facilities that would result in construction and operational changes relative to the existing setting. Air quality and health risk impacts associated with construction and operation of these improvements were assessed using standard and accepted software tools, techniques, and emission factors. A summary of the methodology is provided below.

### Construction Emissions

Projects that could be implemented under the Proposed Program would generate construction-related emissions from mobile and stationary construction equipment exhaust, employee and haul truck vehicle exhaust, land clearing and material movement, paving, and application of architectural coatings.

For purposes of analysis, it is assumed that buildout of the Proposed Program would be 2030. With an anticipated buildout year of 2030, implementation of various projects associated with the Proposed Program would occur over an extended period and would depend on factors such as economic conditions, market and student demands, and other financial and District considerations. Without specific project-level details for all projects, it is not possible to develop an accurate and comprehensive construction inventory for buildout of the Proposed Program.[3] Consequently, the determination of construction air quality impacts for each individual development project, or a combination of these projects, would require the District to speculate regarding such potential future project-level environmental impacts. Thus, in the absence of the necessary construction information required to provide an informative and meaningful analysis, the evaluation of potential construction-related impacts resulting from implementation of the Proposed Program, with the exception of joint-use facilities, is conducted qualitatively.

While specific joint-use facility projects have not been defined, a quantitative analysis was able to be conducted based on the location of future joint-use facilities and assumptions related to the type of construction equipment, durations, etc., used for recently completed joint-use facilities in the District. Total construction emissions associated with future joint-use facilities were modeled using CalEEMod (version 2016.3.2) and data provided by the District (e.g., total number and acreage of joint-use facilities) to scale other inputs (e.g., off-road equipment, hauling trips) based on assumptions from other recent District joint-use facility analyses (Garcia-Craivanu pers. comm. [a]).

## Operational Emissions

District operations include a variety of emission sources that vary by the size of the campus and the types of activities that occur at specific sites. Projects that could be implemented under the Proposed Program would generate operations-related emissions from mobile, area, energy, and off-road sources. Mobile sources are vehicle trips associated with student drop-off/pickup, including school buses, as well as employee travel. Area sources include general landscaping activities, consumer products (e.g., personal care products), and periodic paint emissions from facility upkeep. Energy sources include natural gas combustion for space and water heating requirements. Off-road sources include landscaping equipment used to maintain the joint-use facilities. Operational emissions were quantified for existing (2019) and buildout (2030) conditions.

### Mobile Source Emissions

Air quality impacts from motor vehicles operating within the Program area were evaluated using CARB's EMFAC2017 model and daily vehicle miles traveled (VMT) and trip data for existing (2019) and buildout (2030) year conditions, which was provided by the traffic engineers (Chen Ryan & Associates 2019). Daily VMT and trips were converted to annual VMT and annual trips assuming 180 school days per year. The traffic data only includes VMT and trips generated by academic (elementary, middle, and high school) facilities within the Program area by students and teachers. VMT and trips generated by supporting non-school uses, such as independent administrative facilities, are not included in the transportation assessment. Additionally, the 2030 buildout VMT and trips for the Proposed Program include VMT and trips at existing academic facilities and VMT from District projects that would increase student enrollment at existing academic facilities up to the current planned capacity. Specific project-level details for new schools, projects that increase

[3] Project-level information includes details such as the size and scale of the project to be constructed, construction schedule, equipment fleet, construction worker crew estimates, and demolition and grading quantities.

capacity at existing schools, and non-school uses that may be developed under the Program are not currently known. As such, the mobile source analysis does not account for VMT and trips resulting from potential capacity-increasing projects, and emissions are therefore discussed qualitatively for this programmatic analysis.

Criteria pollutants emissions from motor vehicle travel associated with academic uses were calculated by multiplying the VMT estimates by the appropriate emission factors (e.g., grams per mile for running emissions, brake wear, tire wear) provided by EMFAC2017. These emissions were added to process emissions (i.e., emission from vehicle starts, running losses, etc.), which were calculated by multiplying the daily trips by the appropriate emission factors provided by EMFAC2017. These emissions were added to process emissions (i.e., emission from vehicle starts, running losses, etc.), which were calculated by multiplying the daily trips by the appropriate emission factors (e.g., grams per trip for process emissions) provided by EMFAC2017. County-wide fleet averages, along with aggregate model years and speeds, were assumed. Please refer to Appendix D for the EMFAC emission factors and traffic data utilized in this analysis.

In addition to enrollment increases, criteria pollutants emissions from motor vehicle travel associated with joint-use facilities were estimated using data provided or confirmed by the District (e.g., total number and acreage). Vehicle trips associated with new joint-use facilities are based on the City of San Diego's *Trip Generation Manual* (2012), consistent with recently completed joint-use facilities in the District. Please refer to Appendix D for the CalEEMod output files.

## Area and Energy Source Emissions

Area and energy emissions generated by academic facilities under the Proposed Program were estimated with CalEEMod using existing (2019) and buildout year (2030) student enrollment and capacity data provided by the traffic engineers. Annual electricity natural gas, and water consumption data was provided by the District (Garcia-Craivanu pers. comm. [b]). Consumption rates were determined for each school type using the number of existing and future students provided by the traffic engineers; and the highest energy, natural gas, water consumption rate amongst the school types were conservatively used in the analysis for modeling. Where Program-specific information was unavailable, model defaults (e.g., architectural coating) were used.

Like the mobile source analysis, operational emissions were only quantified for project categories that would increase student enrollment at existing academic facilities up to the current planned capacity. The analysis does not include emissions resulting from non-school uses (e.g., administrative buildings) or capacity-increasing projects (e.g., new schools). The specific number and scope of these potential projects is currently unknown, and, as such, a quantitative emissions analysis of non-school uses and capacity-increasing school projects would be speculative for this programmatic analysis.

Area source emissions generated by joint-use facilities under the Proposed Program were estimated with CalEEMod using existing (2019) and buildout year acreages and landscaping equipment use details provided by the District. Landscaping equipment was modeled as off-road sources, and resulting emissions were added to area source emissions. Per the District, joint-use field parking lots would require lighting, with 20% of total joint-use field acreage representative of the parking lot acreage that would consume electricity for lighting (Garcia-Craivanu pers. comm. [c]).than Please refer to Appendix D for the CalEEMod output files.

### CO Hot Spots

A CO hot spots analysis was completed for the Proposed Program using the CALINE4 dispersion model, EMFAC, and California Department of Transportation's *Transportation Project-Level Carbon Monoxide Protocol*. San Diego Association of Governments (SANDAG) traffic volumes were reviewed to determine the intersection with the highest traffic volume in the city. This was determined to be the Fairmont Avenue and Camino Del Rio intersection (modeled intersection), which had an average daily traffic volume of 86,400 vehicles in 2015 (SANDAG 2015). Daily trip data for the Proposed Program in 2030 was provided by the traffic engineers (Prescott pers. comm.). Daily traffic volumes for the modeled intersection and the Proposed Program were divided by a factor of 10 to calculate peak-hour volumes, based on information provided by the traffic engineers (Cook pers. comm.). To account for the average daily trip contribution per District cluster, the resulting peak-hour volumes for the Proposed Program were then evenly apportioned to the District clusters by dividing by 16.

Hourly CO emissions at the modeled intersection were conservativity quantified assuming that the average number of daily trips within a single District cluster would travel through the intersection within a single hour. Concentrations were modeled along the edges of the vehicle lanes using worst-case meteorological and dispersion assumptions. Ambient CO concentrations were based on the highest reported CO concentrations in the city over the past 5 years. See Appendix D for model outputs.

## Screening Criteria for Future Projects

This PEIR includes project-level screening criteria for construction and operational criteria pollutants, and potential health risks from receptor exposure to construction-generated DPM. The screening criteria provide a conservative indication of whether individual projects developed under the Proposed Program could result in potentially significant air quality impacts. If a future project is below the specified screening criteria and is consistent with the methodology used to develop the screening criteria, then its air quality impacts may be considered less than significant, and a detailed assessment of project-generated emissions would not be needed as part of their project-level CEQA review. The screening criteria were developed using CalEEMod and AERMOD and are representative of District construction and operational activities without any mitigation or emissions controls. Screening criteria are presented after each programmatic impact analysis, except **Impact-AQ-1** and **Impact-AQ-4**. Consistency with air quality plans and odors are conducted qualitatively, and, as such, there are no applicable screening criteria. The following sections detail the methodology for the screening criteria. The screening criteria are incorporated into the District's CEQA Guidelines.

### Construction

Construction screening criteria for three construction types (i.e., construction,[4] construction without demolition, and demolition) were developed for academic facilities and joint-use facilities through a series of iterative CalEEMod runs, beginning with a theoretical maximum scenario for building square footage (academic facilities) and acreage (joint-use facilities). Subsequent model runs adjusted these factors until a maximum screening size that resulted in emissions of all criteria pollutants below thresholds was determined. Model defaults for construction equipment, vehicles, and trips were assumed. All construction phases were conservatively assumed to overlap. No excavation was assumed for all construction types. Refer to Appendix D for the CalEEMod outputs

[4] Construction refers to new construction and remodels.

supporting the construction screening criteria. Tables 4.2-7 and 4.2-9 present the screening size for construction-related criteria air pollutants.

## Operation

Operational screening criteria was developed for each school type (i.e., elementary, junior, and high school) and joint-use facilities through a series of iterative CalEEMod runs, beginning with a theoretical maximum scenario for student enrollment, building square footage, and/or acreage for an individual project. Subsequent model runs adjusted applicable factors until a maximum screening size that resulted in emissions of all criteria pollutants below thresholds was determined for an individual project. District-specific student trip generation rates for each school type were provided by the traffic engineers (Chen Ryan & Associates 2019) and incorporated into the analysis for academic facilities. The analysis also incorporated District-specific electricity and natural gas consumption rates for each school type. Where specific information was unavailable, model defaults (e.g., architectural coating) were used. Refer to Appendix D for the CalEEMod outputs supporting the operational screening criteria. Tables 4.2-8 and 4.2-10 present the screening size for operational criteria air pollutants.

## Health Risk

Health risk screening criteria for three construction types (i.e., construction,[5] construction with demolition, and demolition) were developed for academic facilities and joint-use facilities through a series of iterative AERMOD runs, based on building square footage (academic facilities) and acreage (joint-use facilities) and the associated annual DPM emission rate for each construction type from their respective construction screening criteria CalEEMod runs. Subsequent model runs adjusted these factors until a maximum screening size that resulted in health risks to onsite school receptors below thresholds was determined. Health risks to offsite residential receptors were determined to be below thresholds at prescribed buffer distances from the project site boundary for each construction type. Model defaults for construction equipment, vehicles, and trips were assumed. All construction phases were conservatively assumed to overlap. No excavation was assumed for all construction types.

The health risk screening criteria included several conservative modeling assumptions to ensure the modeling is health protective.

1. The screening criteria is based on the 0 to 2 age bin for residential receptors. This is more conservative than the OEHHA recommendation of beginning residential exposure at the third trimester because the 0 to 2 age bin has the most health protective exposure factors (e.g., highest daily breathing intake rate, and fraction of time at home).
2. OEHHA guidelines recommend projects that have a duration longer than 2 months but less than 6 months to evaluate health outcomes assuming an exposure duration (i.e., project length) of 6 months. All construction projects modeled herein are assumed to last at least 6 months, regardless of their actual length. All project construction scenarios, excluding that all joint-use field acreage is built out simultaneously, are less than 6 months. By applying a 6-month exposure duration minimum, cancer risk for these scenarios is likely much higher when compared to using their actual scenario durations, but is consistent with modeling recommendations from OEHHA.

[5] Construction refers to new construction and remodels.

3. All meteorological stations within the District's service area were reviewed, and the meteorological station with the lowest annual wind speed, which was the Perkins School in Barrio Logan, was used in this analysis. This is a conservative assumption because lower wind speeds would result in less atmospheric mixing and less dispersion of pollutants, resulting in higher pollutant concentrations at nearby receptors.

Implementation of these conservative assumptions translates to higher health risk values for residential receptors that would be modeled for a project-specific analysis if all project conditions (e.g., construction length, appropriate meteorological station for the location) would be known. Refer to Appendix D for the AERMOD and CalEEMod outputs supporting the health risk screening criteria. Tables 4.2-13 and 4.2-14 present the screening sizes and buffer distances for health risks for each construction type.

## 4.2.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining significance of impacts associated with air quality resulting from the Proposed Program. The determination of whether an air quality impacts would be significant is based on the thresholds described below and the professional judgement of the District as the Lead Agency and recommendations of qualified personnel at ICF, all of which is based on the evidence in the administrative record.

Impacts are considered significant effect if the Proposed Program would result in any of the following.

- Conflict with or obstruct implementation of the applicable air quality plan.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard.
- Expose sensitive receptors to substantial pollutant concentrations.
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The State CEQA Guidelines, Appendix G (14 CCR 15000 et seq.), provides guidance for determining whether a project could have significant air quality impacts. Moreover, Appendix G authorizes lead agencies to use significance criteria established by the applicable air quality management district or air pollution control district, and Section 15064.7(c) states that when adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence. The following section summarizes the local air district thresholds and presents substantial evidence regarding the basis upon which the thresholds were developed, and describes how they are used to determine whether project construction and operational emissions would result in the following conditions.

- Interfere with or impede attainment of state or federal ambient air quality standards (CAAQS and NAAQS, respectively).
- Cause increased risk to human health.

## Attainment of State and Federal Ambient Air Quality Standards

As described in Section 4.2.2, *Existing Conditions*, San Diego County is in nonattainment for the federal and state ozone standards and the state PM2.5 and PM10 standards. While SDAPCD has not developed specific thresholds of significance to evaluate construction and operation criteria pollutant impacts within CEQA documents, SDAPCD's Regulation II, Rules 20.2 and 20.3 (new source review for non-major and major stationary sources, respectively), outline AQIA trigger levels for criteria pollutants generated by new or modified sources. In addition, the County of San Diego recommends Screening Level Thresholds that are largely based off the AQIA trigger levels. Therefore, the District considers these AQIA trigger levels suitable for making a determination as to the significance of a project's construction and operational emissions for CEQA purposes. The AQIA trigger levels apply to emissions of $NO_X$, sulfur oxides ($SO_X$), CO, PM10, PM2.5, and Pb.[6] The SDAPCD has not identified trigger levels for VOCs, but the County of San Diego recommends a 75-pound per day VOC screening level threshold. This screening level threshold is based on the threshold of significance for VOCs from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley, which has similar VOC emission sources and ozone attainment status to the SDAB.

Based on SDAPCD's AQIA trigger levels and the County's Screening Level Thresholds, EPA rulemaking, and the threshold levels adopted in areas with similar attainment status, the District recommends the significance thresholds presented in Table 4.2-5 to determine the significance of project-level air quality impacts within the Program area. Emissions in excess of the significance thresholds shown in Table 4.2-5 would be expected to have a significant impact on air quality because an exceedance of the trigger levels established by SDAPCD and the VOC threshold levels in use in similar areas is anticipated to contribute to CAAQS and NAAQS violations.

**Table 4.2-5. Criteria Pollutant Significance Thresholds for the Proposed Program (pounds per day)[1]**

| Air Contaminant | Emission Rate[2] |
|---|---|
| Volatile Organic Compounds (VOCs)[3] | 75 |
| Nitrogen Oxides ($NO_X$) | 250 |
| Carbon Monoxide (CO) | 550 |
| Sulfur Oxides ($SO_X$) | 250 |
| Respirable Particulate Matter (PM10) | 100 |
| Fine Particulate Matter (PM2.5)[4] | 55 |

Source: SDAPCD Regulation II, Rule 20.2; County of San Diego 2007.

[1] SDAPCD Regulation II, Rule 20.2 also identifies hourly and annual emissions rates. However, the daily rates are most appropriate when assessing impacts from standard construction and operation emissions. Therefore, the daily thresholds apply to the Proposed Program.

[2] All emission rates are based on SDAPCD Regulation II, Rule 20.2, except those shown for ROG/VOC.

[3] The terms VOC and ROG are used interchangeably. The County of San Diego's 75-pound per day emissions rate is based on threshold levels from Coachella Valley, which have similar VOC emission sources and ozone attainment status as the SDAB.

[4] SDAPCD Regulation II, Rule 20.2 recommends a daily threshold of 67 pounds per day, while the County of San Diego recommends a daily threshold of 55 pounds per day. The daily threshold of 55 pounds per day is conservatively used in this analysis.

[6] As discussed above, Pb is typically associated with industrial sources and would not be generated by the project. Accordingly, Pb is not discussed further.

The thresholds shown in Table 4.2-5 are based on SDAPCD AQIA trigger levels and emission levels identified under the NSR program, which is a permitting program established by Congress as part of the CAA Amendments of 1990 to ensure that air quality is not significantly degraded by new or modified sources of emissions. The NSR program requires that stationary sources receive permits before construction begins and/or the use of equipment. By permitting large stationary sources, the NSR program ensures that new emissions would not slow regional progress toward attaining the NAAQS. SDAPCD implements the NSR program through Rules 20.2 and 20.3 and has concluded that the stationary pollutants described under the NSR program are equally significant as those pollutants generated by land use development projects. SDAPCD's AQIA trigger levels were set as the total emission thresholds associated with the NSR program to help attain and maintain the NAAQS from new and modified non-major stationary sources. SDAPCD's AQIA trigger levels account for the region's attainment status, emissions sources, current emissions levels, and future emissions projections, and represent levels above which project-generated emissions could affect SDAPCD's requirement to attain the state and federal standards in the region. Consistent with Section 15064.7(c) of the State CEQA Guidelines, the evidence in support of the air quality thresholds shown in Table 4.2-5 is deemed appropriate for their use in a project's air quality analysis.

As described above, the project-level thresholds for the Proposed Program were developed using SDAPCD's AQIA trigger levels, which are based on an analysis of emissions generated by a single project. While the construction emission impacts associated with each new individual project would be short term in nature (relative to the buildout year) and limited to the period of time when construction activity is taking place for that particular project, the concurrent construction of a multitude of individual development projects that could occur at any one time in the District under the Proposed Program would generate combined criteria pollutant emissions on a daily basis that could exceed SDAPCD's AQIA trigger levels. Additionally, depending on the size and scale of an individual project, along with its construction schedule and other parameters, there may also be instances where the daily construction emissions generated by a single project within the District could also exceed the project-level thresholds in Table 4.2-5. As such, construction emissions generated in the District by implementation of the Proposed Program would result in a potentially significant impact on air quality. These emissions could contribute to ozone formation and other air pollution in the SDAB, which at certain concentrations can contribute to short- and long-term human health effects, if left unmitigated.

By its very nature, air pollution is largely a cumulative impact. Potential cumulative air quality impacts would result when cumulative projects' emissions would combine to degrade air quality conditions below attainment levels for the SDAB, delay attainment of air quality standards, affect sensitive receptors, or subject surrounding areas to objectionable odors. The SDAPCD has not established quantitative project-level thresholds to determine whether a project's incremental contribution to emissions would be cumulatively considerable under CEQA. The significance thresholds shown in Table 4.2-5 are based on regional attainment status, and this regional impact is a cumulative impact to which individual projects would contribute on a cumulative basis. A project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. Thus, for cumulative impacts, the District recommends using the same thresholds as a project-level analysis, as shown in Table 4.2-5.

## Human Health Concerns

The California Supreme Court's decision in *Sierra Club v. County of Fresno* (6 Cal. 5th 502) (hereafter referred to as the Friant Ranch Decision) reviewed the long-term, regional air quality analysis

contained in the EIR for the proposed *Community Plan Update* and *Friant Ranch Specific Plan* (Friant Ranch Project). The Friant Ranch Project is a 942-acre master-plan development in unincorporated Fresno County within the San Joaquin Valley Air Basin, an air basin currently in nonattainment under the NAAQS and CAAQS for ozone and PM2.5. The Court found that the EIR's air quality analysis was inadequate because it failed to provide enough detail "for the public to translate the bare [criteria pollutant emissions] numbers provided into adverse health impacts or to understand why such a translation is not possible at this time." The Court's decision clarifies that environmental documents must attempt to connect a project's air quality impacts to specific health effects or explain why it is not technically feasible to perform such an analysis.

As discussed in Section 4.2.2, *Existing Conditions*, all criteria pollutants that would be generated by the Proposed Program are associated with some form of health risk (e.g., asthma, lower respiratory problems). Criteria pollutants can be classified as either regional or localized pollutants. Regional pollutants can be transported over long distances and affect ambient air quality far from the emissions source. Localized pollutants affect ambient air quality near the emissions source. As discussed above, the primary criteria pollutants of concern generated by the Proposed Program are ozone precursors (VOCs and $NO_X$), CO, PM (including DPM), and $SO_2$. Ozone is considered a regional criteria pollutant, whereas CO and $SO_2$ are localized pollutants. PM can be both a local and a regional pollutant, depending on its composition. The following sections discuss thresholds and analysis considerations for regional and local project-generated criteria pollutants with respect to their human health implications.

## Regional Project-Generated Criteria Pollutants (Ozone Precursors and Regional PM)

Adverse health effects induced by regional criteria pollutant emissions generated by the Proposed Program (ozone precursors and PM) are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, the number and character of exposed individuals [e.g., age, gender]). For these reasons, ozone precursors (VOCs and $NO_X$) contribute to the formation of ground-borne ozone on a regional scale. Emissions of VOCs and $NO_X$ generated in one area may not equate to a specific ozone concentration in that same area. Similarly, some types of particulate pollution may be transported over long distances or formed through atmospheric reactions. As such, the magnitude and locations of specific health effects from exposure to increased ozone or regional PM concentrations are the product of emissions generated by numerous sources throughout a region, as opposed to a single individual project. Moreover, exposure to regional air pollution does not guarantee that an individual will experience an adverse health effect—as discussed above, there are large individual differences in the intensity of symptomatic responses to air pollutant. These differences are influenced, in part, by the underlying health condition of an individual, which cannot be known.

Nonetheless, emissions generated by the Proposed Program could increase photochemical reactions and the formation of tropospheric ozone and secondary PM, which at certain concentrations, could lead to increased incidence of specific health consequences, such as various respiratory and cardiovascular ailments. As discussed above, air districts and lead agencies develop region-specific CEQA thresholds of significance in consideration of existing air quality concentrations and attainment designations under the NAAQS and CAAQS. The NAAQS and CAAQS are informed by a wide range of scientific evidence that demonstrates there are known safe concentrations of criteria pollutants. While recognizing that air quality is cumulative problem, air districts and lead agencies typically consider projects that generate criteria pollutant and ozone precursor emissions

below these thresholds to be minor in nature and would not adversely affect air quality such that the NAAQS or CAAQS would be exceeded.

Although health effects are associated with ozone and particulate pollution, the effects are a result of cumulative and regional emissions. Thus, the Proposed Program's incremental contribution cannot be traced to specific health outcomes on a regional scale and a quantitative correlation of project-generated regional criteria pollutant emissions to specific human health impacts is not included in this analysis. In addition, emissions would be scattered around the city, as opposed to being in a single location, resulting in diffused emissions, which would affect the modeling and health outcomes. Finally, a quantitative correlation to project-generated emissions cannot be accurately established based on published studies (Ramboll 2019). All feasible mitigation is being applied to reduce construction- and operational-generated emissions of ozone precursors and PM to the extent possible. Please refer to Threshold 2 for a discussion of project-generated emissions, a description of feasible mitigation, and a discussion of cumulative impacts.

## Localized Project-Generated Criteria Pollutants, TACs, Asbestos, and Odors

Localized pollutants generated by a project are deposited and potentially affect population near the emissions source. Because these pollutants dissipate with distance, emissions from individual projects can result in direct health impacts on adjacent sensitive receptors. Models and thresholds have been developed to quantify these potential effects and evaluate their significance (CAPCOA 2009, OEHHA 2015, CARB 2000). Locally adopted thresholds and analysis procedures for the localized pollutants of concern associated with the Proposed Program (CO, PM, $SO_2$, TACs, and asbestos) are identified below. Thresholds for odors are also discussed.

### Criteria Pollutants—CO, PM, and $SO_X$

SDAPCD Regulation II, Rules 20.2, identifies AQIA analysis triggers for CO, PM, and $SO_X$ (see Table 4.2-5). These mass emission AQIA trigger levels consider basin-wide effects of CO, PM, and $SO_X$ emissions with respect to attainment of the ambient air quality standards. CO, PM, and $SO_X$ emissions below these AQIA trigger levels would not adversely affect air quality such that the NAAQS or CAAQS would be exceeded. Accordingly, projects that generated CO, PM, and $SO_X$ emissions below SDAPCD's AQIA trigger levels, as presented in Table 4.2-5, would not contribute to a significant localized air quality impact. On-road mobile sources could result in a CO hot spot if resulting emissions exceed ambient air quality standards for CO.

### Toxic Air Contaminants

SDAPCD Regulation XII, Rule 1200 establishes permitting standards for new sources of DPM and other TACs. SDAPCD's Rule 1200 includes different risk thresholds depending on if the source of TACs has applied Toxics Best Available Control Technology (T-BACT). SDAPCD will not permit any new, relocated, or modified TAC emissions source that does not meet the risk thresholds established in Rule 1200. As such, the District, for the purposes of this analysis, considers any TAC emissions source that has been permitted by SDAPCD to result in less-than-significant TAC impacts. For determination of significant impacts from project-related health risks, any source or group of sources not permitted by SDAPCD, such as a construction fleet utilized for a project's construction phase, should be evaluated with respect to the risk thresholds identified in Rule 1200. Consistent with Rule 1200, the District considers projects that would generate emission of TACs to result in potentially significant health risks on sensitive receptors if the Health Risk Assessment conducted for a project shows that TAC concentrations would result in any of the following.

- A maximum incremental cancer risk (MICR) greater than 1 in 1 million without application of T-BACT.
- A MICR greater than 10 in 1 million with application of T-BACT.
- A chronic and acute non-cancer health hazard index greater than 1.

The District considers the above thresholds as suitable for determining the cumulative impact of TACs as well. CARB (2005) indicates that source-receptor distances of 1,000 feet substantially reduce health risks on sensitive receptors that are in the general vicinity of TAC sources. For new schools, CARB recommends avoiding new sensitive land uses within 500 feet of a freeway or an urban road with 100,000 vehicles per day to reduce health risk. Further, per Public Resources Code Section 21151.4, projects that would involve the construction or alteration of a facility within a quarter-mile of an existing school that might reasonably be anticipated to emit TACs (such as DPM), or that would involve an extremely hazardous air emission, would not be approved. As such, individual projects that meet these siting requirements would be considered to not have the potential to expose sensitive receptors to substantial pollutant concentrations.

### Asbestos

There are no quantitative thresholds related to receptor exposure to asbestos. However, SDAPCD's rules and regulations require the demolition or renovation of ACMs to comply with the limitations of the NESHAP regulations as listed in the Code of Federal Regulations. The District also provides its construction contractors with specifications to remove and dispose of ACMS (see Section 4.8, *Hazards and Hazardous Materials,* for a description of the District's standard construction specification to address asbestos [Section 02 82 33, Removal and Disposal of Asbestos Containing Materials]). As such, all projects that comply with these rules and regulation are considered to result in less-than-significant impacts with respect to ACMs.

### Odors

There are no quantitative thresholds related to odors. CARB generally discourages siting new schools within 1,000 feet of odor-generating facilities.[7] As such, projects that comply with SDAPCD Rule 51 and do not site new receptors within 1,000 feet of odor-generating facilities would result in less-than-significant impacts. In addition, projects with dust emissions that do not exceed the PM10 and/or PM2.5 thresholds would not result in a significant impact.

[7] CARB also recommends avoiding siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day. However, this recommendation is out of concern for associated health risks as opposed to odors.

# 4.2.4.3 Impacts and Mitigation Measures

***Threshold 1: Would the Proposed Program conflict with or obstruct implementation of the applicable air quality plan?***

## Program-Level Analysis

### All Project Categories and Proposed Program Buildout

#### Impact Discussion

##### *Construction and Operation*

As shown in Table 4.2-3, San Diego County is currently designated as a nonattainment area for the federal and state 8-hour ozone standards and the state ozone PM10 and PM2.5 standards. The RAQS is the region's plan for improving air quality and attaining the state air quality standards. The RAQS relies on information from CARB and SANDAG to project future emissions and determine appropriate emissions reduction strategies. Emissions projections are based on population, vehicle, and land use trends typically developed by the air district. SDAPCD has also adopted an ozone maintenance plan, which is San Diego's portion of the SIP and addresses federal ozone standards.

A project would be deemed inconsistent with air quality plans if it were to result in population and/or employment growth that would exceed the estimates that were used to develop the applicable air quality plans and generate emissions that were not accounted for in the regional emissions budgets. In addition, consistency with emissions reduction strategies outlined in the RAQS and the ozone SIP would be required to show compliance. Therefore, the Proposed Program was evaluated to determine its consistency with land use designations and the growth anticipated, and consistency with the emission reduction strategies presented in the RAQS and ozone maintenance plan prepared for the San Diego region.

The Proposed Program would facilitate the repair, renovation, and revitalization of District schools and administrative facilities. Most of the projects to be implemented under the Proposed Program (e.g., whole site modernization, joint-use facilities, upgrades of existing school sites,) would not affect student capacity and would, thus, not result in population or employment growth that would affect emissions projections. Therefore, these project types would not result in a conflict with or obstruct implementation of the RAQS or ozone SIP.

The Proposed Program also includes projects that could construct entirely new school or administrative facilities, resulting in new student capacity or employment at a new site. Though these projects would increase student and employee populations at new school or administrative facilities, they would generally be implemented to accommodate surrounding community growth and would not independently induce growth. As such, these projects are not anticipated to result in population or employment growth beyond what was projected in the applicable air quality plans. In addition, the Proposed Program would implement control measures consistent with the RAQS and ozone SIP such as the use of low VOC architectural coatings. The Proposed Program would also install new and/or replace existing mechanical equipment (e.g., heating) with improved $NO_X$ controls. Consequently, the Proposed Program would not conflict with or obstruct implementation of the RAQS or ozone SIP.

### Level of Significance Prior to Mitigation

#### *Construction and Operation*

Construction and operation activities associated with all project categories would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction and Operation*

Construction and operation activities associated with all project categories would not conflict with or obstruct implementation of the applicable air quality plan. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

## Site-Specific Analysis

### Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.2-6. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the whole site modernization project category.

**Table 4.2-6. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |

| School | Location |
|---|---|
| Perkins K-8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019.

### Construction and Operation

As listed in Chapter 3, *Project Description,* near-term, site-specific whole site modernization projects would be implemented at 21 school sites. These projects would not increase student capacity and would, thus, not result in population or employment growth that would affect emissions projections. Therefore, these project types would not result in a conflict with or obstruct implementation of the RAQS or ozone SIP. In addition, these projects would implement control measures consistent with the RAQS and ozone SIP such as the use of low VOC architectural coatings as a reasonable available control technology (SDAPCD Rule 67). The Proposed Program would also install new and/or replace existing mechanical equipment (e.g., heating) with improved $NO_X$ controls. Therefore, impacts would be less than significant, and no mitigation is required.

## Level of Significance Prior to Mitigation

### Construction and Operation

Construction and operation activities associated with near-term, site-specific whole site modernization projects would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

### Construction and Operation

Construction and operation activities associated with the near-term, site-specific whole site modernization projects would not conflict with or obstruct implementation of the applicable air quality plan. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

***Threshold 2: Would the Proposed Program result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard?***

## Program-Level Analysis

As described under *Screening Criteria for Future Projects* in Section 4.2.4.1, construction and operational criteria pollutant screening criteria were developed for the four PEIR project categories to facilitate project-level review.

- New Acquisitions and New School or Administrative Facilities
- Whole Site Modernization
- Upgrades of Existing School and Administrative Sites
- Joint-Use Facilities Development Including Fields, Pools, and Play All Day Programs

The screening criteria provide the District with a conservative indication of whether an individual project could result in potentially significant air quality impacts. Thus, the following presents the construction and operational screening criteria for the four project categories and describes how the screening criteria should be used by future projects to assess air quality impacts.

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

As described above under *Threshold 1*, construction activities (e.g., off-road equipment, on-road vehicles, stationary equipment, etc.) from the Proposed Program would result in emissions that could result in short-term impacts on ambient air quality. Table 4.2-7 presents construction screening criteria for new acquisition and new school or administrative facilities, whole site modernization, and upgrades of existing school and administrative sites. Depending on the type of construction activity (e.g., demolition only), the District would select the appropriate screening criteria from Table 4.2-7. Construction air quality impacts would be less than significant if a future project is below the specific screening criteria, and a detailed assessment of project-generated emissions would not be needed as part of their project-level CEQA review.

All projects relying on the screening criteria would need to document that the types of equipment and general approach to construction would be consistent with assumptions used in generating the screening criteria, which form the basis of the emissions estimates for the screening metrics. For instance, this includes being consistent with scheduled number of days (e.g., 20 days for demolition, 3 days for site preparation, 220 days for building construction, etc.); equipment use (e.g., three excavators, one concrete/industrial saw, and two rubber tired dozers operating 8 hours per day during demolition, etc.); and vehicle trips (e.g., 16 daily vendor trips during the building construction phase of construction only projects, etc.) for each phase of construction. See Appendix D for additional information regarding screening criteria assumptions. If a project involves unique construction activities or differs substantially in terms of approach or duration, relative to

assumptions, the construction screening metrics should not be used, and a project-specific emissions inventory would be required.

New Acquisition and New School or Administrative Facilities projects that exceed the screening criteria could potentially result in construction emissions in excess of thresholds and should conduct a project-specific emissions inventory (**Impact-AQ-1)**.

**Table 4.2-7. Construction Criteria Pollutant Screening Criteria for New Acquisition and New School or Administrative Facilities, Whole Site Modernization, and Upgrades of Existing School and Administrative Sites[1]**

| Program Project Type | Demolition Only | Demolition and Construction[2] | Construction Only[2] |
|---|---|---|---|
| New Acquisition and New School or Administrative Facilities, Whole Site Modernization, Upgrades of Existing School and Administrative Sites | >750,000 square feet of demolition | 93,000 square feet of demolition;<br>93,000 square feet of construction | 96,000 square feet of construction |

Source: CalEEMod. See Appendix D.

[1] The square footages presented assumes the use of low VOC paint (75 grams per liter), no demolition of excavation for Construction Only, no excavation for Demolition and Construction, and no excavation or vertical construction for Demolition Only.

[2] Construction square footage represents new square footage and existing square footage affected by future projects, including remodeling efforts.

Projects that meet the screening criteria presented in Table 4.2-7 would not result in construction-related criteria pollutant emissions that would exceed the air quality thresholds. For such projects, air quality impacts would be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis.

For new school or administrative facilities projects that exceed the screening criteria presented in Table 4.2-7, or projects that are not consistent with the construction efforts used in the development of the screening metrics, **MM-AQ-1** through **MM-AQ-3** would be implemented to reduce construction emissions. During construction, the activity that typically generates the highest $NO_X$ emissions is the operation of off-road equipment, whereas the activity that typically generates the highest VOC emissions is the application of architectural coatings. Mitigation measures **MM-AQ-1** through **MM-AQ-3** require the use of at least Tier 4 engines and renewable diesel in off-road equipment, and low-VOC paints. All projects, regardless of their emissions impact, would also be required to comply with SDAPCD Rule 55, which requires implementation of fugitive dust controls. Reductions achieved by these measures cannot currently be quantified because implementation of these mitigation measures is dependent on project type, although they can be required when applicable. Therefore, even with implementation of mitigation, emissions of VOCs, $NO_X$, $SO_X$, CO, PM10, and PM2.5 exhaust may not be reduced to levels below the Proposed Program thresholds when multiple construction projects are occurring concurrently. Therefore, **Impact-AQ-1** would be significant and unavoidable.

***Operation***

Table 4.2-8 presents operational screening criteria for new acquisition and new school or administrative facilities, whole site modernization, and upgrades of existing school and administrative sites. Operational screening metrics are proposed for school uses. Depending on the

school type (elementary, middle, high) and type of project, the District would select either the student enrollment or building square footage criteria, or both from Table 4.2-8. For example, the criteria pollutant screening levels for a middle school project is 13,246 students and 1,463,000 square feet of building space. If the project would affect both students and square footage, the District would conservatively use both screening metrics. If the project does not change building square footage, the District would use student enrollment as the screening metric. Projects that do not exceed the screening criteria presented would not result in operational criteria pollutant emissions that would exceed the air quality thresholds, air quality impacts would then be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis. As the District does not expect any singular new acquisition and new school or administrative facilities, whole site modernization, and upgrades of existing school and administrative sites to exceed the screening criteria identified in Table 4.2-8, operational emissions are anticipated to be less than significant.

**Table 4.2-8. Operational Criteria Pollutant Screening Criteria for New Acquisition and New School or Administrative Facilities, Whole Site Modernization, and Upgrades of Existing School and Administrative Sites**

| School Type | Student Enrollment[2] | Building Square Footage[1] |
|---|---|---|
| Elementary | 7,278 | 1,366,000 |
| Middle | 13,246 | 1,463,000 |
| High | 9,874 | 1,378,000 |

Source: CalEEMod. See Appendix D.

[1] Square footage represents new square footage and existing square footage affected by future projects, including remodeling efforts.

[2] It should be noted the District is highly unlikely to have a school that would exceed these criteria. By way of context, Mira Mesa High School (one of the larger high schools in the District) enrolls approximately 2,200 students and has a total of approximately 350,000 square feet of building area (250,000 square feet of permanent building area with approximately 100,000 square feet of portable classroom space).

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-AQ-1: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of New School or Administrative Facilities.** Construction activities associated with new acquisition and new school or administrative facilities that exceed the screening criteria presented in Table 4.2-7 could result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality.

#### *Operation*

Operation activities associated with new acquisition and new school or administrative facilities are not anticipated to exceed the screening criteria presented in Table 4.2-8. Therefore, operational impacts would be less than significant.

### Mitigation Measures

For **Impact-AQ-1**:

**MM-AQ-1: Require Alternatively Fueled or Implement Newer Engines on Construction Equipment.** Projects that do not meet the District-specific construction screening criteria identified in Table 4.2-7, and are found to result in emissions exceeding the thresholds presented in Table 4.2-5, shall require contractors, as a condition of contract, to further reduce construction-related exhaust emissions by ensuring that all off-road equipment greater than 50 horsepower and operating for more than 20 total hours over the entire duration of construction activities shall be alternatively fueled (e.g., propane, electric) or operate engines based on the schedule below:

- First 5 years of program implementation: Tier 3 Final or newer engines
- 5+ years of program implementation: Tier 4 Final or newer engines

Exemptions can be made for specialized equipment where Tier 4 engines are not commercially available within 200 miles of the project site. The construction contractor must identify these pieces of equipment, document their unavailability, and ensure that they operate on no less than a U.S. Environmental Protection Agency-approved Tier 4 engine after 5 years of program implementation. The District's CEQA Civil/Environmental Coordinator shall evaluate the contractor's submission to determine the lack of availability of necessary equipment within the 200-mile range of the project site.

**MM-AQ-2: Require Construction Fleet to Use Renewable Diesel.** Projects that do not meet the District-specific construction screening criteria identified in Table 4.2-7, and are found to result in emissions exceeding the thresholds presented in Table 4.2-5 shall require their contractors, as a condition of contract, to reduce construction-related exhaust emissions by ensuring that all off-road equipment greater than 50 horsepower and operating for more than 20 total hours over the entire duration of construction activities shall operate on renewable diesel (such as high-performance renewable diesel). Renewable diesel is currently commercially available in the San Diego area. The contractor will submit evidence of the use of low-VOC coatings to the District prior to the start of construction.

**MM-AQ-3: Require Low-Volatile Organic Compound Coatings During Construction**. Projects that do not meet the District-specific construction screening criteria identified in Table 4.2-7, and are found to result in volatile organic compound (VOC) emissions exceeding the thresholds presented in Table 4.2-5 shall require their contractors, as a condition of contract, to reduce construction-related fugitive VOC emissions by ensuring that low-VOC coatings that have a VOC content of 75 grams per liter or less are used during construction. The project applicant will submit evidence of the use of low-VOC coatings to the District prior to the start of construction.

### Level of Significance After Mitigation

#### *Construction*

New Acquisition and New School or Administrative Facilities projects that meet the screening criteria presented in Table 4.2-7 would not result in construction-related criteria pollutant emissions that would exceed the air quality thresholds. For such projects, air quality impacts would

be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis.

For New Acquisition and New School or Administrative Facilities projects that exceed the screening criteria presented in Table 4.2-7, or projects that are not consistent with the construction efforts used in the development of the screening metrics, **MM-AQ-1** through **MM-AQ-3** would be implemented to reduce construction emissions related to new school or administrative facilities. During construction, the activity that typically generates the highest $NO_X$ emissions is the operation of off-road equipment, whereas the activity that typically generates the highest VOC emissions is the application of architectural coatings. Mitigation measures **MM-AQ-1** through **MM-AQ-3** require the use of at least Tier 4 engines and renewable diesel in off-road equipment, and low-VOC paints. All projects, regardless of their emissions impact, would also be required to comply with SDAPCD Rule 55, which requires implementation of fugitive dust controls. Reductions achieved by these measures cannot currently be quantified because their implementation is dependent on project type, although they can be required when applicable. Therefore, even with implementation of mitigation, emissions of VOCs, $NO_X$, $SO_X$, CO, PM10, and PM2.5 exhaust may not be reduced to levels below the Proposed Program thresholds when multiple construction projects are occurring concurrently. Therefore, **Impact-AQ-1** would be significant and unavoidable**.**

#### *Operation*

Operational impacts associated with new acquisition and new school or administrative facilities were determined to be less than significant prior to mitigation. No mitigation is required.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

As described above under *Threshold 1*, construction activities (e.g., off-road equipment, on-road vehicles, stationary equipment, etc.) from the Proposed Program would result in emissions that could result in short-term impacts on ambient air quality. Table 4.2-7 presents construction screening criteria for whole site modernization projects. Depending on the type of construction activity (e.g., demolition only), the District would select the appropriate screening criteria from Table 4.2-7. For example, the criteria pollutant screening level for a new Whole Site Modernization project that includes both construction and demolition would be 93,000 square feet of construction and 93,000 square feet of demolition. Construction air quality impacts would be less than significant if a future project is below the specific screening criteria, and a detailed assessment of project-generated emissions would not be needed as part of their project-level CEQA review.

All projects relying on the screening criteria would need to document that the types of equipment and general approach to construction would be consistent with assumptions used in generating the screening criteria, which form the basis of the emissions estimates for the screening metrics. For instance, this includes being consistent with scheduled number of days (e.g., 20 days for demolition, 3 days for site preparation, 220 days for building construction, etc.); equipment use (e.g., three excavators, one concrete/industrial saw, and two rubber tired dozers operating 8 hours per day during demolition, etc.); and vehicle trips (e.g., 16 daily vendor trips during the building construction phase of construction only projects, etc.) for each phase of construction. See Appendix D for additional information regarding screening criteria assumptions. If a project involves unique

construction activities or differs substantially in terms of approach or duration, relative to assumptions, the construction screening metrics should not be used, and a project-specific emissions inventory would be required.

Whole Site Modernization projects that exceed the screening criteria could potentially result in construction emissions in excess of thresholds and should conduct a project-specific emissions inventory (**Impact-AQ-2)**.

Whole Site Modernization projects that do not exceed the screening criteria presented in Table 4.2-7 would not result in construction-related criteria pollutant emissions that would exceed the air quality thresholds. For such projects, air quality impacts would be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis.

For Whole Site Modernization projects that exceed the screening criteria presented in Table 4.2-7 above, or projects that are not consistent with the construction efforts used in the development of the screening metrics, **MM-AQ-1** through **MM-AQ-3** would be implemented to reduce construction emissions. During construction, the activity that typically generates the highest $NO_X$ emissions is the operation of off-road equipment, whereas the activity that typically generates the highest VOC emissions is the application of architectural coatings. Mitigation measures **MM-AQ-1** through **MM-AQ-3** require the use of at least Tier 4 engines and renewable diesel in off-road equipment, and low-VOC paints. All projects, regardless of their emissions impact, would also be required to comply with SDAPCD Rule 55, which requires implementation of fugitive dust controls. Reductions achieved by these measures cannot currently be quantified because their implementation is dependent on project type, although they can be required when applicable. Therefore, even with implementation of mitigation, emissions of VOCs, $NO_X$, $SO_X$, CO, PM10, and PM2.5 exhaust may not be reduced to levels below the Proposed Program thresholds when multiple construction projects are occurring concurrently. Therefore, **Impact-AQ-2** would be significant and unavoidable.

#### *Operation*

Table 4.2-8 presents operational screening criteria for whole site modernization projects. Operational screening metrics are proposed for school uses. Depending on the school type (elementary, middle, high) and type of project, the District would select either the student enrollment or building square footage criteria, or both from Table 4.2-8. If the project does not change building square footage, the District would use student enrollment as the screening metric. Projects that do not exceed the screening criteria presented would not result in operational criteria pollutant emissions that would exceed the air quality thresholds, air quality impacts would then be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis. As the District does not anticipate any singular whole site modernization project to exceed the screening criteria identified in Table 4.2-8, operational emissions are anticipated to be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-AQ-2: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of Whole Site Modernization Projects.** Construction

activities associated with Whole Site Modernization projects that exceed the screening criteria presented in Table 4.2-7 could result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality.

***Operation***

Operation activities associated with whole site modernization projects are not anticipated to exceed the screening criteria presented in Table 4.2-8. Therefore, operational impacts would be less than significant.

### Mitigation Measures

For **Impact-AQ-2**:

Implement **MM-AQ-1** through **MM-AQ-3**, as described above.

### Level of Significance After Mitigation

***Construction***

Whole Site Modernization projects that meet the screening criteria presented in Table 4.2-7 would not result in construction-related criteria pollutant emissions that would exceed the air quality thresholds. For such projects, air quality impacts would be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis.

For Whole Site Modernization projects that exceed the screening criteria presented in Table 4.2-7, or projects that are not consistent with the construction efforts used in the development of the screening metrics, implementation of **MM-AQ-1** through **MM-AQ-3** would reduce construction emissions related to whole site modernizations. During construction, the activity that typically generates the highest $NO_X$ emissions is the operation of off-road equipment, whereas the activity that typically generates the highest VOC emissions is the application of architectural coatings. Mitigation measures **MM-AQ-1** through **MM-AQ-3** require the use of at least Tier 4 engines and renewable diesel in off-road equipment, and low-VOC paints. All projects, regardless of their emissions impact, would also be required to comply with SDAPCD Rule 55, which requires implementation of fugitive dust controls. Reductions achieved by these measures cannot currently be quantified because their implementation is dependent on project type, although they can be required when applicable. Therefore, even with implementation of mitigation, emissions of VOCs, $NO_X$, $SO_X$, CO, PM10, and PM2.5 exhaust may not be reduced to levels below the Proposed Program thresholds when multiple construction projects are occurring concurrently. Therefore, **Impact-AQ-2** would be significant and unavoidable**.**

***Operation***

Operational impacts associated with Whole Site Modernization projects were determined to be less than significant prior to mitigation. No mitigation is required.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

As described above under *Threshold 1*, construction activities (e.g., off-road equipment, on-road vehicles, stationary equipment, etc.) from the Proposed Program would result in emissions that could result in short-term impacts on ambient air quality. Table 4.2-7 above presents construction screening criteria for upgrades of existing school and administrative sites. Depending on the type of construction activity (e.g., demolition only), the District would select the appropriate screening criteria from Table 4.2-7. Construction air quality impacts would be less than significant if a future project is below the specific screening criteria, and a detailed assessment of project-generated emissions would not be needed as part of their project-level CEQA review.

All upgrades of existing school sites relying on the screening criteria would need to document that the types of equipment and general approach to construction would be consistent with assumptions used in generating the screening criteria, which form the basis of the emissions estimates for the screening metrics. See Appendix D for additional information regarding screening criteria assumptions. If a project involves unique construction activities or differs substantially in terms of approach or duration, relative to assumptions, the construction screening metrics should not be used, and a project-specific emissions inventory would be required.

Upgrades of existing school sites that exceed the screening criteria could potentially result in construction emissions in excess of thresholds and should conduct a project-specific emissions inventory (**Impact-AQ-3)**.

Upgrades of existing school sites that meet the screening criteria presented in Table 4.2-7 would not result in construction-related criteria pollutant emissions that would exceed the air quality thresholds. For such projects, air quality impacts would be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis.

For projects that exceed the screening criteria presented in Table 4.2-7 above, or projects that are not consistent with the construction efforts used in the development of the screening metrics, **MM-AQ-1** through **MM-AQ-3** would be implemented to reduce construction emissions. During construction, the activity that typically generates the highest $NO_X$ emissions is the operation of off-road equipment, whereas the activity that typically generates the highest VOC emissions is the application of architectural coatings. Mitigation measures **MM-AQ-1** through **MM-AQ-3** require the use of at least Tier 4 engines and renewable diesel in off-road equipment, and low-VOC paints. All projects, regardless of their emissions impact, would also be required to comply with SDAPCD Rule 55, which requires implementation of fugitive dust controls. Reductions achieved by these measures cannot currently be quantified because their implementation is dependent on project type, although they can be required when applicable. Therefore, even with implementation of mitigation, emissions of VOCs, $NO_X$, $SO_X$, CO, PM10, and PM2.5 exhaust may not be reduced to levels below the Proposed Program thresholds when multiple construction projects are occurring concurrently. Therefore, **Impact-AQ-3** would be significant and unavoidable.

#### *Operation*

Table 4.2-8 presents operational screening criteria for upgrades of existing school and administrative sites. Operational screening metrics are proposed for school uses. Depending on the

school type (elementary, middle, high) and type of project, the District would select either the student enrollment or building square footage criteria, or both from Table 4.2-8. Projects that do not exceed the screening criteria presented would not result in operational criteria pollutant emissions that would exceed the air quality thresholds, air quality impacts would then be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis. As the District does not anticipate any singular upgrades of existing school sites project to exceed the screening criteria identified in Table 4.2-8, operational emissions are anticipated to be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-AQ-3: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of Upgrades of Existing School and Administrative Sites.** Construction activities associated upgrades of existing school and administrative sites that exceed the screening criteria presented in Table 4.2-7 could result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality.

#### *Operation*

Operation activities associated with upgrades of existing school sites projects are not anticipated to exceed the screening criteria presented in Table 4.2-8. Therefore, operational impacts would be less than significant.

### Mitigation Measures

For **Impact-AQ-3**:

Implement **MM-AQ-1** through **MM-AQ-3**, as described above.

### Level of Significance After Mitigation

#### *Construction*

Upgrades of existing school and administrative sites that meet the screening criteria presented in Table 4.2-7 would not result in construction-related criteria pollutant emissions that would exceed the air quality thresholds. For such projects, air quality impacts would be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis.

For upgrades of existing school and administrative sites that exceed the screening criteria presented in Table 4.2-7, or projects that are not consistent with the construction efforts used in the development of the screening metrics, **MM-AQ-1** through **MM-AQ-3** would be implemented to reduce construction emissions. During construction, the activity that typically generates the highest $NO_X$ emissions is the operation of off-road equipment, whereas the activity that typically generates the highest VOC emissions is the application of architectural coatings. Mitigation measures **MM-AQ-1** through **MM-AQ-3** require the use of at least Tier 4 engines and renewable diesel in off-road

equipment, and low-VOC paints. All projects, regardless of their emissions impact, would also be required to comply with SDAPCD Rule 55, which requires implementation of fugitive dust controls. Reductions achieved by these measures cannot currently be quantified because their implementation is dependent on project type, although they can be required when applicable. Therefore, even with implementation of mitigation, emissions of VOCs, $NO_X$, $SO_X$, CO, PM10, and PM2.5 exhaust may not be reduced to levels below the Proposed Program thresholds when multiple construction projects are occurring concurrently. Therefore, **Impact-AQ-3** would be significant and unavoidable**.**

#### *Operation*

Operational impacts associated with upgrades of existing school sites projects were determined to be less than significant prior to mitigation. No mitigation is required

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

Table 4.2-9 presents construction screening criteria for joint-use facilities. Similar to new acquisition and new school or administrative facilities, whole site modernization, and upgrades of existing school and administrative sites, all joint-use projects relying on the screening criteria in Table 4.2-9 would need to document that the types of equipment and general approach to construction would be consistent with assumptions used in generating the screening criteria, which form the basis of the emissions estimates for the screening metrics. For instance, this includes being consistent with scheduled number of days (e.g., 5 days for removing existing decomposed granite and 5 days for installing turf, track, and fencing); equipment use (e.g., one scraper, one roller, one grader, one tractor/loader/backhoe, and three rubber tired dozers operating 8 hours per day to remove existing decomposed granite); and vehicle trips (e.g., 10 daily worker trips) for each phase of construction. See Appendix D for additional information regarding screening criteria assumptions. If a joint-use project involves unique construction activities or differs substantially in terms of approach or duration, relative to assumptions, the construction screening metrics should not be used, and a project-specific emissions inventory would be required.

Projects that meet the screening criteria presented would not result in construction-related criteria pollutant emissions that would exceed the air quality thresholds. Air quality impacts would be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis. Projects that exceed the screening criteria could potentially result in construction emissions in excess of thresholds and should conduct a project-specific emissions inventory **(Impact-AQ-4)**. Implementation of **MM-AQ-1** through **MM-AQ-3** would be required and would reduce construction emissions related to joint-use facilities development. Mitigation measures **MM-AQ-1** through **MM-AQ-3** require the use of at least Tier 4 engines and renewable diesel in off-road equipment, and low-VOC paints. All projects, regardless of their emissions impact, would also be required to comply with SDAPCD Rule 55, which requires implementation of fugitive dust controls. Reductions achieved by these measures cannot currently be quantified because their implementation is dependent on project type, although they can be required when applicable. Therefore, even with implementation of mitigation, emissions of VOCs, $NO_X$, $SO_X$, CO, PM10, and PM2.5 exhaust may not be reduced to levels below the Proposed Program thresholds when multiple

construction projects are occurring concurrently. Therefore, **Impact-AQ-4** would be significant and unavoidable**.**

**Table 4.2-9. Construction Criteria Pollutant Screening Criteria for Joint-Use Facilities**

| Program Project Type | Demolition Only | Construction Only[1] |
|---|---|---|
| Joint-Use Facilities | See Table 4.2-7 | >15 acres |

Source: CalEEMod. See Appendix D.

[1] Construction acreage represents new acreage and existing acreage affected by future projects.

***Operation***

Table 4.2-10 presents operational screening criteria for joint-use facilities. Projects that do not exceed the screening criteria presented would not result in operational criteria pollutant emissions that would exceed the air quality thresholds, air quality impacts would be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis. Projects that exceed the screening criteria could potentially result in operational emissions in excess of thresholds and should conduct a project-specific emissions inventory **(Impact-AQ-5)**.

**Table 4.2-10. Operational Criteria Pollutant Screening Criteria for Joint-Use Facilities**

| Program Project Type | Acreage |
|---|---|
| Joint-Use Facilities | 15 acres[1] |

Source: CalEEMod. See Appendix D.

[1] Joint-use facilities implemented under the Proposed Program are highly unlikely to ever reach 15 acres in size.

As described above, operational activities within the various sectors (e.g., energy, mobile, etc.) from joint-use facilities would result in emissions that could result in impacts on ambient air quality.

Projects that meet the screening criteria presented in Table 4.2-10 would not result in operational criteria pollutant emissions that would exceed the air quality thresholds. For such projects, air quality impacts would be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis.

For projects that exceed the screening criteria presented in Table 4.2-10, or projects that are not consistent with the operational assumptions used in the development of the screening metrics, implementation of **MM-AQ-4**, which promotes and requires the use of electrical landscaping equipment for joint-use fields, would eliminate area source emissions and the net increase emissions from joint-use facilities would be below Proposed Program thresholds. Thus, emissions associated with operations of joint-use facilities are anticipated to be less than significant.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-AQ-4: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of Joint-Use Facilities.** Construction activities associated with joint-use facilities that exceed the screening criteria presented in Table 4.2-9 could

result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality.

***Operation***

**Impact-AQ-5: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Operation of Joint-Use Facilities.** Operational activities associated with joint-use facilities that exceed the screening criteria presented in Table 4.2-10 could result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality.

### Mitigation Measures

For **Impact-AQ-4**:

Implement **MM-AQ-1** through **MM-AQ-3**, as described above.

For **Impact-AQ-5**:

**MM-AQ-4: Require Electrical Landscaping Equipment.** The District shall coordinate with the City of San Diego to promote and require use of electrical landscaping equipment.

**MM-AQ-5: Require Green Consumer Products.** The District shall promote and require the use of green products. Examples of green products may include low-volatile organic compound architectural coatings (75 grams per liter) and cleaning supplies, as well as alternatively fueled landscaping equipment.

### Level of Significance After Mitigation

***Construction***

Joint-use facilities projects that meet the screening criteria presented in Table 4.2-9 would not result in construction-related criteria pollutant emissions that would exceed the air quality thresholds. For such projects, air quality impacts would be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis.

For joint-use facilities development that exceeds the screening criteria presented in Table 4.2-9, or projects that are not consistent with the construction efforts used in the development of the screening metrics, implementation of **MM-AQ-1** through **MM-AQ-3** would reduce construction emissions related to joint-use facilities. During construction, the activity that typically generates the highest $NO_X$ emissions is the operation of off-road equipment, whereas the activity that typically generates the highest VOC emissions is the application of architectural coatings. Mitigation measures **MM-AQ-1** through **MM-AQ-3** require the use of at least Tier 4 engines within 5 years of implementation of the Proposed Program and renewable diesel in off-road equipment, and low-VOC paints. All projects, regardless of their emissions impact, would also be required to comply with SDAPCD Rule 55, which requires implementation of fugitive dust controls. Reductions achieved by these measures cannot currently be quantified because their implementation is dependent on

project type, although they can be required when applicable. Therefore, even with implementation of mitigation, emissions of VOCs, $NO_X$, $SO_X$, CO, PM10, and PM2.5 exhaust may not be reduced to levels below the Proposed Program thresholds when multiple construction projects are occurring concurrently. Therefore, **Impact-AQ-4** would be significant and unavoidable**.**

***Operation***

As described above, operational activities within the various sectors (e.g., energy, mobile, etc.) from joint-use facilities would result in emissions that could result in impacts on ambient air quality.

Projects that meet the screening criteria presented in Table 4.2-10 would not result in operational criteria pollutant emissions that would exceed the air quality thresholds. For such projects, air quality impacts would be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis.

For projects that exceed the screening criteria presented in Table 4.2-10, or projects that are not consistent with the operational assumptions used in the development of the screening metrics, implementation of **MM-AQ-4**, which promotes and requires the use of electrical landscaping equipment for joint-use fields, and **MM-AQ-5,** which requires the use of green consumer products, would eliminate area source emissions and net increase emissions from joint-use facilities would be below Proposed Program thresholds. Thus, with mitigation, emissions associated with operations of joint-use facilities are anticipated to be less than significant.

## Proposed Program Buildout

### Impact Discussion

***Construction***

Construction associated with the full buildout of the Proposed Program would result in the temporary generation of ozone precursors (VOC, $NO_X$), CO, $SO_X$, PM10, and PM2.5 emissions that could result in short-term impacts on ambient air quality. Emissions could originate from mobile and stationary construction equipment exhaust, employee and haul truck vehicle exhaust, land clearing, demolition, architectural coatings, and asphalt paving. Construction-related emissions would vary substantially depending on the level of activity, length of the construction period, specific construction operations, types of equipment, number of personnel, wind and precipitation conditions, and soil moisture content.

By its nature as a program, the Proposed Program does not propose any specific projects. Rather, construction of projects under the Proposed Program would occur intermittently within District boundaries throughout the course of the buildout period. As the timing and intensity of all future projects are not known at this time, the precise effects of construction activities associated with full program buildout cannot be accurately quantified. However, assumptions for past joint-use facility projects were provided by the District and were used to quantify criteria air pollutant emissions. As the specific construction schedule is not known, Table 4.2-11 presents the maximum daily emissions assuming construction of all joint-use facilities (20 joint-use facilities, totaling 69.09 acres) would occur concurrently for informational purposes.

**Table 4.2-11. Maximum Daily Emissions from Construction of Joint-Use Facilities (pounds per day)**

| Source | VOC | $NO_X$ | CO | $SO_2$ | PM10 | PM2.5 |
|---|---|---|---|---|---|---|
| Overlapping Construction | 61 | 710 | 372 | 1 | 29 | 26 |

Source: CalEEMod, See Appendix D.
Construction emissions conservatively assume concurrent construction of all joint-use facilities. Per data provided by the District, 20 joint-use facilities totaling 69.09 acres would be constructed under the Proposed Program. Emissions would be less than shown should construction not occur concurrently.

Nevertheless, the details of all other future projects, including number and scope of projects, is currently unknown as projects would be driven by District needs and other economic and planning considerations. As such, it is anticipated that in any given year, multiple projects could be constructed within District boundaries.

As noted previously, the thresholds used in this analysis to assess the Proposed Program were developed from SDAPCD's AQIA trigger levels, which were developed to analyze emissions generated by a single project. While the construction emission impacts associated with each new project would be short-term in nature (relative to the buildout year) and limited to the period of time when construction activity is taking place for that particular project, the concurrent construction of a multitude of individual projects that could occur at any one time under the Proposed Program would generate combined criteria pollutant emissions on a daily basis that would exceed the Proposed Program thresholds. Additionally, depending on the size and scale of an individual project, along with its construction schedule and other parameters, there may also be instances where the daily construction emissions generated by a single project could also exceed the Proposed Program's criteria pollutant thresholds. For instance, new school and whole site modernization projects would require heavy equipment use for activities such as demolition, ground disturbance, and grading, over multiple years, while other projects (e.g., upgrades to existing school sites) would require minimal to no ground disturbance and light equipment over a shorter duration. As such, construction emissions generated by implementation of the Proposed Program would result in a potentially significant impact on air quality. These emissions could contribute to ozone formation and other air pollution in the SDAB, which at certain concentrations can contribute to short- and long-term human health effects if left unmitigated (**Impact-AQ-6)**.

For projects that exceed the screening criteria presented in Tables 4.2-7 and 4.2-9, or projects that are not consistent with the construction efforts used in the development of the screening metrics, implementation of **MM-AQ-1** through **MM-AQ-3** would reduce construction emissions of the Proposed Program. During construction, the activity that typically generates the highest $NO_X$ emissions is the operation of off-road equipment, whereas the activity that typically generates the highest VOC emissions is the application of architectural coatings. Mitigation measures **MM-AQ-1** through **MM-AQ-3** require the use of at least Tier 4 engines and renewable diesel in off-road equipment, and low-VOC paints. All projects, regardless of their emissions impact, would also be required to comply with SDAPCD Rule 55, which requires implementation of fugitive dust controls. Reductions achieved by these measures cannot currently be quantified because their implementation is dependent on project type, although they can be required when applicable. Therefore, even with implementation of mitigation, emissions of VOCs, $NO_X$, $SO_X$, CO, PM10, and PM2.5 exhaust may not be reduced to levels below the Proposed Program thresholds when multiple construction projects are occurring concurrently. Therefore, **Impact-AQ-6** would be significant and unavoidable**.**

***Operation***

The Proposed Program would be constructed over 10 years through 2030, with operations occurring concurrently with construction. Therefore, operational emissions would include overlapping construction emissions. However, as described above, quantified analysis of all potential criteria pollutant emissions, with the exception of joint-use facilities, during construction is not possible. Therefore, construction and operation emissions from joint-use facilities were incorporated into the quantified analysis of overall operational emissions.

Buildout of the Proposed Program has the potential to result in air quality impacts from area, energy, and mobile sources. Each of these sources, where applicable, was considered in calculating the long-term operational emissions, which were quantified using CalEEMod and EMFAC.

Table 4.2-12 summarizes daily area, energy, and mobile source emissions generated by academic facilities and joint-use facilities under existing (2019) and future (2030) conditions with the Proposed Program. As discussed in Section 4.2.4.1, *Methodology*, emissions were only quantified for District projects that would increase student enrollment at existing academic facilities up to the current planned capacity. The analysis does not include emissions resulting from non-school uses (e.g., administrative buildings) or capacity-increasing projects (e.g., new schools).

**Table 4.2-12. Estimated Daily Emissions from Academic Facilities and Joint-Use Facilities that Would Not Increase Capacity (pounds per day)**

| Condition/Source | VOC | $NO_X$ | CO | $SO_2$ | PM10 | PM2.5 |
|---|---|---|---|---|---|---|
| **Existing (2019)** | | | | | | |
| Academic Uses[1] | | | | | | |
| Area Sources | 404 | <1 | 12 | <1 | <1 | <1 |
| Energy Sources | 4 | 35 | 29 | <1 | 3 | 3 |
| Mobile Sources | 156 | 405 | 1,619 | 5 | 544 | 143 |
| Joint-Use Facilities[2] | | | | | | |
| Area Sources | 84 | 744 | 632 | 1 | 57 | 52 |
| Energy Sources[3] | -- | -- | -- | -- | -- | -- |
| Mobile Sources | 34 | 138 | 364 | 1 | 86 | 24 |
| *Total Existing* [4] | 681 | 1,332 | 2,657 | 7 | 690 | 232 |
| **With the Proposed Program (2030)[3]** | | | | | | |
| Academic Uses[5] | | | | | | |
| Area Sources | 604 (520[6]) | <1 | 18 | <1 | <1 | <1 |
| Energy Sources | 6 | 52 | 44 | <1 | 4 | 4 |
| Mobile Sources | 125 | 245 | 1,306 | 5 | 813 | 209 |
| Joint-Use Facilities Construction[7] | 61 | 710 | 372 | 1 | 29 | 26 |
| Joint-Use Facilities Operation[8] | | | | | | |
| Area Sources | 99 | 883 | 750 | 1 | 67 | 62 |
| Energy Sources[3] | -- | -- | -- | -- | -- | -- |
| Mobile Sources | 40 | 163 | 432 | 1 | 102 | 28 |
| *Total with Proposed Program*[2] | 935 (851[6]) | 2,054 | 2,922 | 8 | 1,015 | 328 |

| Condition/Source | VOC | $NO_X$ | CO | $SO_2$ | PM10 | PM2.5 |
|---|---|---|---|---|---|---|
| **Net Increase in Academic Facility and Joint-Use Facility Emissions with the Proposed Program** | | | | | | |
| 2030 w/Proposed Program vs. Existing | 253 (170[6]) | 731 | 265 | <1 | 325 | 107 |
| Threshold | 75 | 250 | 550 | 250 | 100 | 55 |
| Exceed Threshold? | **Yes** | **Yes** | No | No | **Yes** | **Yes** |

Sources: CalEEMod and EMFAC. See Appendix D.

[2] Emissions quantified based on the current (2019) emissions intensity for area, energy, and mobile sources and the 2018 student enrollment at existing schools. Energy data was provided by the District.

[2] Emissions quantified based on the current (2019) emissions intensity for area and mobile sources at existing joint-use facilities.

[3] Per the District, parking lots for joint-use facilities would consume electricity. However, electricity consumption generates GHG emissions only and does not generate criteria pollutants.

[4] Values may not add up due to rounding.

[5] Emissions quantified based on the future projected emissions intensity for area, energy, and mobile sources in 2030 and the student capacity at existing schools. This analysis assumes projects implemented under the Proposed Program would increase student enrollment at existing schools to the maximum allowable capacity. The analysis does not include any emissions resulting from non-school uses (e.g., administrative buildings) or capacity-increasing projects (e.g., new schools).

[6] VOC emissions with implementation of **MM-AQ-5,** which requires low-VOC coatings (75 grams per liter) during operation and use of green consumer products, are shown within ( ).

[7] Maximum daily construction emissions for joint-use facilities, conservatively assuming all construction activities to overlap during a single year of construction. Should activities not overlap, daily emissions would be reduced.

[8] Emissions quantified based on the future projected emissions intensity for area and mobile sources in 2030 and the acreage of joint-use facilities.

As shown in Table 4.2-12, increases in student enrollment at existing schools, and construction and operation of new joint-use facilities would result in a net increase in daily VOCs, $NO_X$, CO, $SO_X$, PM10, and PM2.5 emissions compared to existing conditions. Implementation of **MM-AQ-5** would reduce VOC emissions but not sufficiently below project-level thresholds. The estimated VOC, $NO_X$, PM10, and PM2.5 emissions would exceed the project-level thresholds used by the District in this analysis, indicating that full operation of existing academic uses and joint-use facilities could contribute to air quality impacts, including ozone formation, in the SDAB. Most VOC emissions would be generated by consumer products, such as cleaning supplies. $NO_X$ and PM emissions would be generated by mobile sources and area sources (e.g., landscaping equipment).

Upgrades to existing school sites are not likely to increase student enrollment or emissions, relative to existing conditions. Rather, these projects may the enhance operational efficiency of existing buildings, resulting in criteria pollutant emissions reductions. These potential benefits are not reflected in Table 4.2-12. On the other hand, the table also does not account for projects that would operate entirely new emission sources (e.g., new stationary sources at new schools). Projects that construct and operate new schools and non-school facilities could result in long-term emissions that individually exceed thresholds presented in Table 4.2-5. Accordingly, the emissions estimates presented in Table 4.2-12 may be greater or less depending on the types of projects that are ultimately operated at full buildout of the Proposed Program.

While the Proposed Program would reduce the severity of criteria pollutants by (1) reducing per student VMT from students returning to or enrolling in neighborhood schools, (2) maximizing the use of green consumer products, and (3) planting native and low water usage plants—especially ones that require minimal pruning and maintenance thereby minimizing the use of mowers—individual projects (e.g., new schools) may still generate emissions in excess of the Proposed

Program thresholds. Accordingly, operational criteria pollutant emissions associated with the Proposed Program would be potentially significant **(Impact-AQ-7)**. Project-level screening criteria have been developed for the Proposed Program; therefore, project-level impacts are discussed further in the sections below.

For projects that exceed the screening criteria presented in Tables 4.2-8 and 4.2-10, or projects that are not consistent with the operational assumptions used in the development of the screening metrics presented in Tables 4.2-8 and Tables 4.2-10, implementation of **MM-AQ-4**, which promotes and requires the use of electrical landscaping equipment for joint-use fields, would reduce area source $NO_X$ emissions and net increase $NO_X$ emissions to less-than-significant levels. Mitigation measure **MM-AQ-5**, which promotes and requires the use of green consumer products, including low-VOC paints, would reduce area source emissions to 520 pounds per day, resulting in a net increase of 164 pounds of VOC per day, indicating that full operation of existing academic uses would result in significant VOC impacts. However, implementation of **MM-AQ-4** and **MM-AQ-5** may not reduce area source emissions for the Proposed Program (as it did for full operation of existing academic uses). Reductions achieved by these measures cannot currently be quantified because their implementation is dependent on project type, although they can be required when applicable. There is no additional feasible mitigation to reduce operational emissions beyond **MM-AQ-4** and **MM-AQ-5.** Therefore, **Impact-AQ-7** would be significant and unavoidable**.**

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-AQ-6: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction.** Construction activities associated Proposed Program Buildout that exceed the screening criteria presented in Tables 4.2-7 and 4.2-9 could result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in the SDAB, which at certain concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality.

#### *Operation*

**Impact-AQ-7: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Operation.** Operational activities associated with the Proposed Program Buildout (4.2-12) would result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in the SDAB, which at certain concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality.

### Mitigation Measures

For **Impact-AQ-6**:

Implement **MM-AQ-1** through **MM-AQ-3**, as described above.

For **Impact-AQ-7**:

Implement **MM-AQ-4** and **MM-AQ-5**, as described above.

### Level of Significance After Mitigation

#### *Construction*

For projects that are not consistent with the construction efforts used in the development of the screening metrics, implementation of **MM-AQ-1** through **MM-AQ-3** would reduce construction emissions of the Proposed Program. During construction, the activity that typically generates the highest $NO_X$ emissions is the operation of off-road equipment, whereas the activity that typically generates the highest VOC emissions is the application of architectural coatings. Mitigation measures **MM-AQ-1** through **MM-AQ-3** require the use of at least Tier 4 engines and renewable diesel in off-road equipment, and low-VOC paints. All projects, regardless of their emissions impact, would also be required to comply with SDAPCD Rule 55, which requires implementation of fugitive dust controls. Reductions achieved by these measures cannot currently be quantified because implementation of these mitigation measures is dependent on project type, although they can be required when applicable. Therefore, even with implementation of mitigation, emissions of VOCs, $NO_X$, $SO_X$, CO, PM10, and PM2.5 exhaust may not be reduced to levels below the Proposed Program thresholds when multiple construction projects are occurring concurrently. Therefore, **Impact-AQ-6** would be significant and unavoidable**.**

#### *Operation*

As described above, operational activities within the various sectors (e.g., energy, mobile, etc.) from the Proposed Program would result in emissions that could result in impacts on ambient air quality.

For projects that exceed the screening criteria presented in Tables 4.2-8 and 4.2-10, or projects that are not consistent with the operational assumptions used in the development of the screening metrics presented in Tables 4.2-8 and 4.2-10, implementation of **MM-AQ-4**, which promotes and requires the use of electrical landscaping equipment for joint-use fields, would reduce area source $NO_X$ emissions and net increase $NO_X$ emissions to less-than-significant levels. Mitigation measure **MM-AQ-5**, which promotes and requires the use of green consumer products, including low-VOC paints, would reduce area source emissions to 520 pounds per day, resulting in a net increase of 164 pounds of VOC per day, indicating that full operation of existing academic uses would result in significant VOC impacts. However, implementation of **MM-AQ-4** and **MM-AQ-5** may not reduce area source emissions for the Proposed Program (as it did for full operation of existing academic uses). Reductions achieved by these measures cannot currently be quantified because their implementation is dependent on project type, although they can be required when applicable. There is no additional feasible mitigation to reduce operational emissions beyond **MM-AQ-4** and **MM-AQ-5.** Therefore, **Impact-AQ-7** would be significant and unavoidable**.**

## Site-Specific Analysis

### Impact Discussion

Near-term, site-specific whole site modernization projects (see Chapter 3, *Project Description*) that meet the construction and operational screening criteria presented in Tables 4.2-7 and 4.2-8 would result in less-than-significant air quality impacts. Projects that do not meet the screening criteria

could potentially result in construction and/or operational emissions in excess of thresholds and should conduct a project-specific emissions inventory to determine whether mitigation may be required.

### Construction

As described above, Proposed Program construction activities (e.g., off-road equipment, on-road vehicles, stationary equipment) would result in emissions that could have short-term impacts on ambient air quality. Table 4.2-7 presents construction screening criteria for new acquisition and new school or administrative facilities, whole site modernization, and upgrades of existing school and administrative sites. Depending on the type of construction activity (e.g., demolition only, etc.), the District would select the appropriate screening criteria from Table 4.2-7. Construction air quality impacts would be less than significant if a future project is below the specific screening criteria, and a detailed assessment of project-generated emissions would not be needed as part of their project-level CEQA review. Projects that do not meet the screening criteria could potentially result in construction emissions in excess of thresholds and should conduct a project-specific emissions inventory (**Impact-AQ-2**).

Implementation of **MM-AQ-1** through **MM-AQ-3** would reduce construction emissions. During construction, the activity that typically generates the highest $NO_X$ emissions is the operation of off-road equipment, whereas the activity that typically generates the highest VOC emissions is the application of architectural coatings. Mitigation measures **MM-AQ-1** through **MM-AQ-3** require the use of at least Tier 4 engines and renewable diesel in off-road equipment and low-VOC paints. All projects, regardless of their emissions impact, would also be required to comply with SDAPCD Rule 55, which requires implementation of fugitive dust controls. Reductions achieved by these measures cannot currently be quantified because their implementation is dependent on project type, although they can be required when applicable. Therefore, even with implementation of mitigation, emissions of VOCs, $NO_X$, $SO_X$, CO, PM10, and PM2.5 may not be reduced to levels below the Proposed Program thresholds when multiple construction projects are concurrently ongoing. Therefore, **Impact-AQ-2** would be significant and unavoidable**.**

### Operation

Table 4.2-8 presents operational screening criteria that would be applicable to the near-term, site-specific whole site modernization projects. Operational screening metrics are proposed for school uses (elementary, middle, and high school). As described above, the District does not anticipate any singular whole site modernization project to exceed the screening criteria identified in Table 4.2-8. Therefore, operational emissions are anticipated to be less than significant.

## Level of Significance Prior to Mitigation

### Construction

**Impact-AQ-2: Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for Which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of Whole Site Modernization Projects.** Construction activities associated with Whole Site Modernization projects that do not meet the screening criteria presented in Table 4.2-7 could result in emissions exceeding thresholds presented in Table 4.2-5. These emissions could contribute to ozone formation and other air pollution in the San Diego Air

Basin, which at certain concentrations can contribute to short- and long-term human health effects, which would result in a potentially significant impact on air quality.

#### Operation

Operational impacts were determined to be less than significant prior to mitigation. No mitigation is required.

### Mitigation Measures

For **Impact-AQ-2**:

Implement **MM-AQ-1** through **MM-AQ-3**, as described above.

### Level of Significance After Mitigation

#### Construction

Near-term, site-specific whole site modernization projects that meet the screening criteria presented in Table 4.2-7 would not result in construction-related criteria pollutant emissions that would exceed the air quality thresholds. Air quality impacts would be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis.

For near-term, site-specific whole site modernization projects that exceed the screening criteria presented in Table 4.2-7, or projects that are not consistent with the construction efforts used in the development of the screening metrics, implementation of **MM-AQ-1** through **MM-AQ-3** would reduce construction emissions. During construction, the activity that typically generates the highest $NO_X$ emissions is the operation of off-road equipment, whereas the activity that typically generates the highest VOC emissions is the application of architectural coatings. Mitigation measures **MM-AQ-1** through **MM-AQ-3** require the use of at least Tier 4 engines and renewable diesel in off-road equipment and low-VOC paints. All projects, regardless of their emissions impact, would also be required to comply with SDAPCD Rule 55, which requires implementation of fugitive dust controls. Reductions achieved by these measures cannot currently be quantified because implementation of these mitigation measures is dependent on project type, although they can be required when applicable. Therefore, even with implementation of mitigation, emissions of VOCs, $NO_X$, $SO_X$, CO, PM10, and PM2.5 may not be reduced to levels below the Proposed Program thresholds when multiple construction projects are concurrently ongoing. Therefore, **Impact-AQ-2** would be significant and unavoidable**.**

#### Operation

Operational impacts were determined to be less than significant prior to mitigation.

## *Threshold 3: Would the Proposed Program expose sensitive receptors to substantial pollutant concentrations?*

## Program-Level Analysis

As described under *Screening Criteria for Future Projects* in Section 4.2.4.1, health risk construction screening criteria were developed for the following four PEIR project categories for project-level

review. The screening criteria provide the District with a conservative indication of whether an individual project could result in potentially significant health risk impacts. Thus, the following presents the construction and operational screening criteria for the four project categories and describes how the screening criteria should be used by future projects to assess sensitive receptors.

## New Acquisition and New School or Administrative Facilities, Whole Site Modernization, Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

*Criteria Air Pollutants*

As discussed above, the Proposed Program thresholds presented in Table 4.2-5 consider existing air quality concentrations and attainment or nonattainment designations under the NAAQS and CAAQS. The NAAQS and CAAQS are informed by a wide range of scientific evidence that demonstrates there are known safe concentrations of criteria pollutants. While recognizing that air quality is a cumulative problem, projects that generate criteria pollutant and ozone precursor emissions below these levels are presumed to be minor in nature and would not adversely affect air quality such that the health-protective NAAQS or CAAQS would be exceeded. Regional emissions generated by a project could increase photochemical reactions and the formation of tropospheric ozone and secondary PM, which at certain concentrations, could lead to increased incidence of specific health consequences. Although these health effects are associated with ozone and particulate pollution, the effects are a result of cumulative and regional emissions (**Impact-AQ-8)**.

Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during construction and long-term operation could exceed the District's thresholds for the purposes of this analysis. Accordingly, new school or administrative facilities, whole site modernizations, and upgrades of existing school and administrative sites could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-8** would be significant and unavoidable.

*Toxic Air Contaminants*

Demolition of existing structures results in particulates that may disperse ACMs to adjacent sensitive receptor locations. ACM were commonly used as fireproofing and insulating agents prior to the 1970s. The U.S. Consumer Product Safety Commission banned use of most ACMs in 1977 due to their link to mesothelioma. However, buildings constructed prior to 1977 that would be demolished by the development supported by the Proposed Program may have used ACMs and could expose receptors to asbestos, which may become airborne with other particulates during demolition. All demolition activities during Proposed Program construction would be subject to EPA's asbestos NESHAP if asbestos is present at the existing facilities. The asbestos NESHAP regulations protect the public by minimizing the release of asbestos fibers during activities involving the processing, handling, and disposal of ACM. The asbestos NESHAP regulations for demolition and renovation are outlined in SDAPCD Regulation 11 and are included in the District's construction specifications (see Section 4.8, *Hazards and Hazardous Materials* for a description of the District's standard construction specification [Section 02 82 33, Removal and Disposal of Asbestos Containing

Materials]). Consequently, regulatory mechanisms exist that would ensure that impacts from ACMs, if present during demolition under the Proposed Program, would be less than significant.

Equipment and vehicles used during construction would generate TACs, such as DPM, potentially resulting in the exposure of nearby existing sensitive receptors (e.g., residences, students) to increased pollutant concentrations. Similarly, construction activities of future projects under the Proposed Program would generate DPM that could expose adjacent receptors (e.g., residences, students) to significant health risks. The primary driver of health risk from DPM and all TACs is the concentration of a substance (i.e., the pollutant) and the duration of exposure. Cancer health risks associated with exposure to DPM are typically associated with chronic (long-term) exposure, in which a 30-year exposure period is assumed. In addition, DPM concentrations, and, thus, cancer health risks, typically dissipate as a function of distance from the emissions source (OEHHA 2015). Without specific details on the locations of building footprints or their construction schedules, a quantitative evaluation of potential health risk impacts is not possible. Therefore, depending on the size and scale of an individual project, along with its construction schedule and proximity to receptors, there may also be instances where DPM emissions could result in cancer or non-cancer health risks that exceed thresholds per SDACPD's Rule 1200, resulting in a potentially significant impact.

Table 4.2-13 presents construction health risk screening criteria for new acquisition and new school or administrative facilities, whole site modernization, and upgrades of existing school and administrative sites. Depending on the type of construction activity (e.g., demolition only), the District would select the appropriate screening criteria from Table 4.2-13. As discussed in Section 4.2.4.1 *Methodology*, the health risk screening criteria was based on modeling assumptions that would result in highly conservative health risk estimates for residential receptors. For example, the construction health risk screening level for a new whole site modernization project that includes both construction and demolition would be 43,000 square feet of construction on an approximately 0.99-acre site with the nearest residential receptor farther than 50 meters away. For all scenarios, onsite school receptors' health risks would be below thresholds.

It should be noted that the 50-meter distance is based on the measurement from the construction area boundary (i.e., emission source) to the nearest residential receptor and not the distance from the project site boundary to the nearest offsite residential receptors. In some instances, the construction area boundary and project site boundary may be the same; however, if the construction area boundary is located 50 meters or more from the project site boundary, then health risks at residential receptors located beyond the project site boundary would be below health risk thresholds. Construction health risk impacts would be less than significant if a future project is below the specific screening criteria, and a detailed health risk assessment of project-generated emissions would not be needed as part of their project-level CEQA review.

**Table 4.2-13. Construction Health Risk Screening Criteria for New Acquisition and New School or Administrative Facilities, Whole Site Modernization, and Upgrades of Existing School and Administrative Sites**

| Project Activity[1,2,3] | Building Size (square feet) | Lot Size (acres) | Distance to Nearest Residential Receptor (meters)[2,4] |
|---|---|---|---|
| Demolition Only | >750,000 | 17.22 | 0 |
| Construction and Demolition | 43,000 | 0.99 | 50 |
| Construction Only | 43,000 | 0.99 | 45 |

Source: AERMOD and CalEEMod. See Appendix D.

Note: The square footages presented assume the use of low VOC paint (75 grams per liter).

[1] No demolition of excavation assumed for Construction Only activities, no excavation assumed for Demolition and Construction activities, and no excavation or vertical construction assumed for Demolition Only activities.

[2] Health risks for onsite receptors (e.g., students) were determined to be below the 10 in 1 million threshold for all project activities.

[3] Projects must not exceed all criteria presented (i.e., not exceed specified building size and lot size, and residential receptors must not be located closer than the distance specified).

[4] This value represents the distance from the construction area boundary (i.e., emissions source) to the nearest offsite residential receptor. If a project's construction area boundary is located 50 meters or more away from the project site boundary, then the project would not exceed health risk thresholds at offsite residences.

All projects relying on the screening criteria would need to document that the types of equipment used and general approach to construction would be consistent with assumptions used in generating the health risk screening criteria, which form the basis of the emissions estimates for the screening metrics. See Appendix D for additional information regarding screening criteria assumptions. If a project involves unique construction activities or differs substantially in terms of approach or duration, relative to assumptions, the construction screening metrics should not be used, and a project-specific emissions inventory would be recommended.

Projects that exceed the screening criteria could potentially result in construction emissions in excess of thresholds and should conduct a project-specific emissions inventory to further assess potential health risks (**Impact-AQ-9)**. Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction DPM emissions for major construction projects that do not meet the health risk screening criteria presented in Tables 4.2-13 and 4.2-14. However, the extent of the reductions is unknown. Therefore, after mitigation, **Impact-AQ-9** would be significant and unavoidable, and a project-specific emissions inventory and/or health risk assessment would be required for the project-level environmental analysis to determine project-specific health risks.

***Operation***

*Criteria Air Pollutants*

As discussed under *Threshold 2*, long-term operation of new school or administrative facilities, whole site modernizations, or upgrades to existing school and administrative facilities could result in a net increase of criteria pollutant emissions in excess of the thresholds, which were developed using the SDAPCD AQIA trigger levels, and would thus contribute a significant level of air pollution within the SDAB during operations (**Impact-AQ-10**). Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during construction and long-term

operation could exceed the District's thresholds for the purposes of this analysis. Accordingly, new school or administrative facilities could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-10** would be significant and unavoidable.

Increases in student enrollment resulting from implementation of new school or administrative facilities, whole site modernizations, and upgrades of existing school and administrative sites could also potentially create new localized CO hotspots. As shown in Table 4.2-12, most operational CO emissions would be generated by mobile sources. New vehicle trips associated with new school or administrative facilities would add to existing intersection volumes and congestion. Because localized, high levels of CO from mobile sources are associated with idling or slow-moving vehicles, impacts related to localized CO from mobile sources are typically determined by estimating CO concentrations from the most project-impacted intersections, where the concentrations would be the greatest.

As described under Section 4.2.4.1, *Methodology,* it was conservatively assumed that all peak-hour daily vehicle trips within a District cluster would travel through the city's most congested intersection in a single hour. Modeling results show that daily vehicle trips related to the Proposed Program from academic facilities would yield maximum 1-hour and 8-hour CO concentrations of 5.2 and 3.7 parts per million, respectively, at the modeled intersection. This result is conservative because it assumes vehicles trips from academic facilities throughout a District cluster would all travel through the same intersection in a single hour. The conservative results are well below federal and state standards and would accommodate any future increases in intersection volumes should they occur, as well as any additional vehicle trips from non-school uses. Therefore, new school or administrative facilities, whole site modernizations, and upgrades of existing school and administrative sites are not anticipated to result in CO hotspots.

*Toxic Air Contaminants*

Future projects within the city may result in the installation or operation of new stationary and mobile sources of TACs (e.g., generators, buses) near existing schools. While it is unknown what specific sources would be installed or where they would operate, all new stationary sources would be subject to the permit authority of the SDACPD. While this regulatory mechanism may reduce DPM through emission control requirements, cancer and health hazard impacts from stationary sources developed under the Proposed Program may still exceed SDAPCD trigger levels. However, per Public Resources Code Section 21151.4, projects that would involve the operation of a facility within a quarter-mile of an existing school or school facility that might reasonably be anticipated to emit hazardous air emissions, or that would handle an extremely hazardous air emissions would not be approved. In addition, CARB's school bus regulations require buses to be equipped with filters and other retrofits. Therefore, new school or administrative facilities would not result in substantial increases in bus-related emissions. Accordingly, such future projects within the city that may result in TAC emissions would not expose receptors at existing schools to significant health risks.

For new schools, CARB (2005) recommends avoiding new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 vehicles per day. In addition, Public Resources Code Section 21151.8 requires new schools that may be sited within 500 feet of a freeway or urban road to complete dispersion modeling to ensure that new receptors would not be exposed to significant health risk. Epidemiological studies indicate that the distance from the roadway and truck traffic densities are key factors in the correlation of health effects, particularly in children. Schools near

roadways that do not expose students to significant health risk often install indoor air quality equipment, such as enhanced air filters, to enhance air quality. In addition, implementation of the Proposed Program would ultimately result in an increase in student enrollment at existing schools and new schools, and depending on the nature of future projects, could increase traffic (vehicle miles traveled) and generate additional vehicle-related TACs (including DPM). However, as discussed in Section 4.13, *Transportation,* although the Proposed Program would result in an increase in VMT, the per student VMT would decrease at existing academic facilities because students would be returning to or enrolling in their assigned District school and traveling shorter distances than under current conditions. Accordingly, future travel levels from new school or administrative facilities are not anticipated to substantially exacerbate existing cumulative health risks. Impacts related to exacerbation of existing environmental TACs hazards would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-AQ-8: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites.** Construction activities associated with new school and administrative facilities, whole site modernizations, and upgrades of existing school and administrative sites could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

**Impact-AQ-9: Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites.** Construction activities associated with new school and administrative facilities, whole site modernizations, and upgrades of existing school and administrative sites that do not meet the screening criteria presented in Tables 4.2-13 and 4.2-14 could result in Toxic Air Contaminant (TAC) emissions that exceed health risk thresholds. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

Additional emissions generated by new stationary sources and vehicle trips could expose receptors to cancer and non-cancer risks in excess of thresholds per San Diego Air Pollution Control District (SDAPCD) Rule 1200. However, as described above, the Public Resources Code would ensure that receptors at existing schools are not exposed to significant health risks from TAC emissions of new stationary sources. In addition, the Public Resources Code would ensure receptors at new schools would not be exposed to increased emissions from mobile sources from major roadways. The Proposed Program would also reduce per student vehicle miles traveled (VMT) compared to current conditions. Thus, these impacts would be less than significant.

#### *Operation*

**Impact-AQ-10: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of New School and Administrative Facilities, Whole Site**

**Modernizations, and Upgrades of Existing School and Administrative Sites.** Operational activities associated with new school and administrative facilities, whole site modernizations, and upgrades of existing school and administrative sites could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

### Mitigation Measures

For **Impact-AQ-8**:

Implement **MM-AQ-1** through **MM-AQ-5**, as described above.

For **Impact-AQ-9**:

Implement **MM-AQ-1** and **MM-AQ-2**, as described above.

For **Impact-AQ-10**:

Implement **MM-AQ-1** through **MM-AQ-5**, as described above.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during construction could exceed the District's thresholds for the purposes of this analysis. Accordingly, new school or administrative facilities, whole site modernizations, and upgrades of existing school and administrative sites could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-8** would be significant and unavoidable.

Projects that do not exceed the screening criteria presented in Tables 4.2-13 and 4.2-14 would not result in construction-related health risks that would exceed thresholds. Impacts would be less than significant, and a project-specific emissions inventory and/or health risk assessment would not be required for the project-level environmental analysis.

Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction DPM emissions for major construction projects that do not meet the health risk screening criteria presented in Tables 4.2-13 and 4.2-14. However, the extent of the reductions is unknown. Therefore, after mitigation, **Impact-AQ-9** would be significant and unavoidable, and a project-specific emissions inventory and/or health risk assessment would be required for the project-level environmental analysis to determine project-specific health risks.

Emissions from TAC emissions were determined to be less than significant prior to mitigation.

#### *Operation*

Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM

emissions during long-term operation could exceed the District's thresholds for the purposes of this analysis. Accordingly, new school or administrative facilities, whole site modernizations, and upgrades of existing school and administrative sites could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-10** would be significant and unavoidable.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

*Criteria Air Pollutants*

As discussed above, emissions generated by joint-use facilities development could lead to increased incidence of specific health consequences should Proposed Program thresholds presented in Table 4.2-5 be exceeded (**Impact-AQ-11)**. Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during construction and long-term operation could exceed the District's thresholds for the purposes of this analysis. Accordingly, joint use facilities development could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-11** would be significant and unavoidable.

*Toxic Air Contaminants*

As described above, equipment and vehicles used during construction would generate TACs, such as DPM, potentially resulting in the exposure of nearby existing sensitive receptors to increased pollutant concentrations and health risks.

Table 4.2-14 presents construction health risk screening criteria for joint-use facilities. Two scenarios were evaluated for joint-use facilities: (1) construction of all joint-use facilities totaling 15 acres and (2) construction of an individual joint-use facility totaling 3 acres. Projects that meet the screening criteria presented would not result in construction-related health risks that would exceed the health risk thresholds described above. Air quality impacts would be less than significant, and a project-specific emissions inventory would not be required for the project-level environmental analysis.

It should be noted that the distance values in Table 4.2-14 are based on the measurement from the construction area boundary (i.e., emission source) to the nearest residential receptor, and not the distance from the project site boundary to the nearest residential receptors. In some instances, the construction area boundary and project site boundary may be the same; however, if the construction area boundary is located 32 meters or more from the project site boundary (i.e., within the school boundary), then health risks at offsite residential receptors located beyond the project site boundary would be below thresholds and an individual joint-use facility would not result in significant health risk impacts.

**Table 4.2-14. Construction Health Risk Screening Criteria for Joint-Use Facilities**

| Program Project Type | Lot Size (acres) | Distance to Nearest Residential Receptor (meters) |
|---|---|---|
| Individual Joint-Use Facility[1] | 3 | 32 |
| All Joint-Use Facilities[2] | 15 | 120 |

Source: AERMOD and CalEEMod. See Appendix D.

[1]An individual joint-use facility must not exceed all criteria presented (i.e., not exceed a lot size of 3 acres and not be closer than 32 meters from the construction area boundary to nearest residential receptor).

[2] Joint-use facility projects must not exceed all criteria presented (i.e., not exceed a lot size of 15 acres and not be closer than 120 meters from the construction area boundary to the nearest residential receptor).

All projects relying on the screening criteria would need to document that the types of equipment and general approach to construction would be consistent with assumptions used in generating the health risk screening criteria, which form the basis of the emissions estimates for the screening metrics. See Appendix D for additional information regarding screening criteria assumptions. If a project involves unique construction activities or differs substantially in terms of approach or duration, relative to assumptions, the construction screening metrics should not be used, and a project-specific emissions inventory would be recommended.

Projects that do not meet the health risk screening criteria could potentially result in construction emissions in excess of health risk thresholds and should conduct a project-specific emissions inventory to further assess potential health risks (**Impact-AQ-12)**. Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction DPM emissions for major construction projects that do not meet the health risk screening criteria presented in Tables 4.2-13 and 4.2-14. However, the extent of the reductions is unknown. Therefore, after mitigation, **Impact-AQ-12** would be significant and unavoidable, and a project-specific emissions inventory and/or health risk assessment would be required for the project-level environmental analysis to determine project-specific health risks.

***Operation***

*Criteria Air Pollutants*

As discussed under *Threshold 2*, long-term operation of joint-use facilities, could result in a net increase of criteria pollutant emissions in excess of the thresholds, which were developed using the SDAPCD AQIA trigger levels, and would thus contribute a significant level of air pollution within the SDAB during operations (**Impact-AQ-13**). Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during construction and long-term operation could exceed the District's thresholds for the purposes of this analysis. Accordingly, joint-use facilities development could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-13** would be significant and unavoidable.

Increases in student enrollment resulting from implementation of the joint-use facilities could also potentially create new localized CO hotspots. As shown in Table 4.2-12, most operational CO emissions would be generated by mobile sources. New vehicle trips associated with the joint-use facilities would add to existing intersection volumes and congestion. Because localized, high levels of

CO from mobile sources are associated with idling or slow-moving vehicles, impacts related to localized CO from mobile sources are typically determined by estimating CO concentrations from the most project-impacted intersections, where the concentrations would be the greatest.

As described under Section 4.2.4.1, *Methodology,* it was conservatively assumed that all peak-hour daily vehicle trips from all activities within a District cluster would travel through the city's most congested intersection in a single hour. Modeling results show that daily vehicle trips related to the Proposed Program from academic facilities result in maximum 1-hour and 8-hour CO concentrations of 5.2 and 3.7 parts per million, respectively, at the modeled intersection. This result is conservative because it assumes vehicles trips from academic facilities throughout a District cluster would all travel through the same intersection in a single hour. The conservative results are well below federal and state standards and would accommodate any future increases in intersection volumes should they occur, as well as any additional vehicle trips from non-school uses. Therefore, joint-use facilities development is not anticipated to result in CO hotspots.

*Toxic Air Contaminants*

Future projects within the city may result in the installation or operation of new stationary and mobile sources of TACs (e.g., generators, buses) near joint-use fields. While it is unknown what specific sources would be installed or where they would operate, all new stationary sources would be subject to the permit authority of the SDACPD. While this regulatory mechanism may reduce DPM through emission control requirements, cancer and health hazard impacts from stationary sources developed under the Proposed Program may still exceed SDAPCD trigger levels. However, per Public Resources Code Section 21151.4, projects that would involve the operation of a facility within a quarter-mile of an existing school or school facility that might reasonably be anticipated to emit hazardous air emissions, or that would handle an extremely hazardous air emissions would not be approved. In addition, CARB's school bus regulations require buses to be equipped with filters and other retrofits. Therefore, joint-use facilities development would not result in substantial increases in bus-related emissions. Accordingly, such future projects within the city that may result in TAC emissions would not expose receptors at joint-use facilities to significant health risks.

Accordingly, future travel levels related to joint-use facilities development are not anticipated to substantially exacerbate existing cumulative health risks. Impacts related to exacerbation of existing environmental TACs hazards would be less than significant.

**Level of Significance Prior to Mitigation**

***Construction***

**Impact-AQ-11: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of Joint-Use Facilities.** Construction and operational activities associated with joint-use facilities could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

**Impact-AQ-12: Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of Joint-Use Facilities.** Construction activities associated with joint-use facilities that do not meet the screening criteria presented in Tables 4.2-13 and 4.2-14

could result in Toxic Air Contaminant (TAC) emissions that exceed health risk thresholds. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

Additional emissions generated by new stationary sources and vehicle trips could expose receptors to cancer and non-cancer risks in excess of thresholds per San Diego Air Pollution Control District (SDAPCD) Rule 1200. However, as described above, the Public Resources Code would ensure that receptors at existing schools are not exposed to significant health risks from TAC emissions of new stationary sources. In addition, the Public Resources Code would ensure receptors at new schools would not be exposed to increased emissions from mobile sources from major roadways. The Proposed Program would also reduce per student vehicle miles traveled (VMT) compared to current conditions (see Section 4.13, *Transportation*). Thus, these impacts would be less than significant.

***Operation***

**Impact-AQ-13: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of Joint-Use Facilities.** Operational activities associated with joint-use facilities could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

### Mitigation Measures

For **Impact-AQ-11**:

Implement **MM-AQ-1** through **MM-AQ-5**, as described above.

For **Impact-AQ-12**:

Implement **MM-AQ-1** and **MM-AQ-2,** as described above.

For **Impact-AQ-13**:

Implement **MM-AQ-1** through **MM-AQ-5**, as described above.

### Level of Significance After Mitigation

***Construction***

Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during construction could exceed the District's thresholds for the purposes of this analysis. Accordingly, joint-use facilities development could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-11** would be significant and unavoidable.

Projects that do not exceed the screening criteria presented in Tables 4.2-13 and 4.2-14 would not result in construction-related health risks that would exceed thresholds. Impacts would be less than significant, and a project-specific emissions inventory and/or health risk assessment would not be required for the project-level environmental analysis.

Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction DPM emissions for major construction projects that do not meet the health risk screening criteria presented in Tables 4.2-13 and 4.2-14. However, the extent of the reductions is unknown. Therefore, after mitigation, **Impact-AQ-12** would be significant and unavoidable, and a project-specific emissions inventory and/or health risk assessment would be required for the project-level environmental analysis to determine project-specific health risks.

#### *Operation*

Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during long-term operation could exceed the District's thresholds for the purposes of this analysis. Accordingly, joint-use facilities development could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-13** would be significant and unavoidable.

Emissions from TAC emissions were determined to be less than significant prior to mitigation.

## Proposed Program Buildout

### Impact Discussion

#### *Construction*

*Criteria Air Pollutants*

As discussed above, construction emissions from the Proposed Program could exceed the regional thresholds presented in Table 4.2-5 for VOC, $NO_X$, $SO_X$, CO, PM10, and PM2.5, which were developed using the SDAPCD AQIA trigger levels, and would thus contribute a significant level of air pollution within the SDAB during the Proposed Program construction.

Models and tools have been developed to correlate regional criteria pollutant emissions to potential community health impacts. Appendix D summarizes many of these tools, identifies the analyzed pollutants, describes their intended application and resolution, and analyzes whether they could be used to reasonably correlate project-level emissions to specific health consequences. As described in Appendix D, while there are models capable of quantifying ozone and secondary PM formation and associated health effects, these tools were developed to support regional planning and policy analysis and have limited sensitivity to small changes in criteria pollutant concentrations induced by individual projects. Therefore, translating project-generated criteria pollutants to the locations where specific health effects could occur or calculating the resultant number of additional days of nonattainment cannot be performed with any degree of accuracy.

Technical limitations of existing models to correlate project-level regional emissions to specific health consequences are recognized by air quality management districts throughout the state, including the San Joaquin Valley Air Pollution Control District (SJVAPCD) and SCAQMD, which provided amici curiae briefs for the Friant Ranch legal proceedings. In its brief, SJVAPCD (2015) acknowledges that while health risk assessments for localized air toxics, such as DPM, are commonly prepared, "it is not feasible to conduct a similar analysis for criteria air pollutants because currently available computer modeling tools are not equipped for this task." SJVAPCD further notes that emissions solely from the Friant Ranch project (which equate to less than one-tenth of one percent

of the total $NO_X$ and VOCs in the Valley) is not likely to yield valid information," and that any such information should not be "accurate when applied at the local level." SCAQMD (2015) presents similar information in their brief, stating that "it takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels."[8] The Sacramento Metropolitan Air Quality Management District (SMAQMD) (2019) also acknowledges that neither SMAQMD or any other air district "currently have a methodology that would correlate the expected air quality emissions of projects to the likely health consequences of the increased emissions." Currently, no expert agency or air quality management district has approved a quantitative method for accurately correlating criteria pollutant emissions generated by an individual project to specific health outcomes or changes in nonattainment days.

Health impacts would vary according to the equipment used, the location and timing of the actions, the meteorological and air quality conditions at the time of implementation, and the location of receptors relative to the emission source. Potential health effects during construction would be further evaluated and identified in the subsequent project-level environmental analysis conducted for future projects. However, note that SCAQMD (2015) acknowledges that a project emitting $NO_X$ or VOC below their threshold of 10 tons per year "is small enough that its regional impact on ambient ozone levels may not be detected in the regional air quality models" and it would "not be feasible to directly correlate project emissions of VOCs or $NO_X$ with specific health impacts from ozone." Therefore, the impact of exposing sensitive receptors to health risks in excess of the mass emissions thresholds presented in Table 4.2-5 would be potentially significant (**Impact-AQ-14**). Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during construction and long-term operation could exceed the District's thresholds for the purposes of this analysis. Accordingly, implementation of near-term, site-specific whole site modernization projects could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-14** would be significant and unavoidable.

*Toxic Air Contaminants*

As described above, the Proposed Program may disperse ACMs to adjacent sensitive receptor locations. However, regulatory mechanisms exist that would ensure that impacts from ACMs, if present during demolition under the Proposed Program, would be less than significant.

In addition, as described above, equipment and vehicles used during construction of academic and non-academic facilities would generate TACs (including DPM), potentially resulting in the exposure of nearby existing sensitive receptors to increased pollutant concentrations and health risks (**Impact-AQ-15)**. Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction DPM emissions for major construction projects that do not meet the health risk screening criteria presented in Table 4.2-13. However, the extent of the reductions is unknown. Therefore, after mitigation, **Impact-AQ-15** would be significant and unavoidable, and a project-specific emissions inventory and/or health risk assessment would be required for the project-level environmental analysis to determine project-specific health risks.

[8] For example, SCAQMD's analysis of their 2012 Air Quality Attainment Plan showed that modeled $NO_X$ and ROG reductions of 432 and 187 tons per day, respectively, only reduced ozone levels by 9 ppb. Analysis of SCAQMD's Rule 1315 showed that emissions of $NO_X$ and ROG of 6,620 and 89,180 pounds per day, respectively, contributed to 20 premature deaths per year and 89,947 school absence (SCAQMD 2015).

***Operation***

*Criteria Air Pollutants*

As discussed under *Threshold 2*, long-term operation of development under the Proposed Program (e.g., new schools, whole site modernization, upgrades of existing school sites, joint-use facilities, etc.) could result in a net increase of criteria pollutant emissions in excess of the thresholds, which were developed using the SDAPCD AQIA trigger levels, and would thus contribute a significant level of air pollution within the SDAB during the Proposed Program operations (**Impact-AQ-16**). Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during construction and long-term operation could exceed the District's thresholds for the purposes of this analysis. Accordingly, implementation of near-term, site-specific whole site modernization projects could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-16** would be significant and unavoidable.

Increases in student enrollment resulting from implementation of the Proposed Program could also potentially create new localized CO hotspots. As shown in Table 4.2-12, most operational CO emissions would be generated by mobile sources. New vehicle trips associated with the Proposed Program would add to existing intersection volumes and congestion. Because localized, high levels of CO from mobile sources are associated with idling or slow-moving vehicles, impacts related to localized CO from mobile sources are typically determined by estimating CO concentrations from the most project-impacted intersections, where the concentrations would be the greatest.

As described under Section 4.2.4.1, *Methodology,* it was conservatively assumed that all peak-hour daily vehicle trips within a District cluster would travel through the city's most congested intersection in a single hour. Modeling results show that daily vehicle trips from the Proposed Program from academic facilities result in maximum 1-hour and 8-hour CO concentrations of 5.2 and 3.7 parts per million, respectively, at the modeled intersection. This result is conservative because it assumes vehicles trips from academic facilities throughout a District cluster would all travel through the same intersection in a single hour. The conservative results are well below federal and state standards and would accommodate any future increases in intersection volumes should they occur, as well as any additional vehicle trips from non-school uses. Therefore, the Proposed Program is not anticipated to result in CO hotspots.

*Toxic Air Contaminants*

Future projects within the city may result in the installation or operation of new stationary and mobile sources of TACs (e.g., generators, buses) near existing schools and joint-use facilities. While it is unknown what specific sources would be installed or where they would operate, all new stationary sources would be subject to the permit authority of the SDACPD. While this regulatory mechanism may reduce DPM through emission control requirements, cancer and health hazard impacts from stationary sources developed under the Proposed Program may still exceed SDAPCD trigger levels. However, per Public Resources Code Section 21151.4, projects that would involve the operation of a facility within a quarter-mile of an existing school or school facility that might reasonably be anticipated to emit hazardous air emissions, or that would handle an extremely hazardous air emissions would not be approved. In addition, CARB's school bus regulations require buses to be equipped with filters and other retrofits. Therefore, the Proposed Program would not result in substantial increases in bus-related emissions. Accordingly, such future projects within the

city that may result in TAC emissions would not expose receptors at existing schools and joint-use facilities to significant health risks.

For new schools, CARB (2005) recommends avoiding new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 vehicles per day. In addition, Public Resources Code Section 21151.8 requires new schools that may be sited within 500 feet of a freeway or urban road to complete dispersion modeling to ensure that new receptors would not be exposed to significant health risk. Epidemiological studies indicate that the distance from the roadway and truck traffic densities are key factors in the correlation of health effects, particularly in children. Schools near roadways that do not expose students to significant health risk often install indoor air quality equipment, such as enhanced air filters, to enhance air quality. In addition, the implementation of the Proposed Program would ultimately result in an increase in student enrollment at existing schools and new schools, and depending on the nature of future projects, could increase traffic (vehicle miles traveled) and generate additional vehicle-related TACs (including DPM). However, as discussed in Section 4.13, *Transportation,* although the Proposed Program would result in an increase in VMT, the per student VMT would decrease at existing academic facilities because students would be returning to or enrolling in their assigned District school and traveling shorter distances than under current conditions. Accordingly, future travel levels from the Proposed Program are not anticipated to substantially exacerbate existing cumulative health risks. Impacts related to exacerbation of existing environmental TACs hazards would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-AQ-14: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of Buildout of the Proposed Program.** Construction activities associated with the Proposed Program (e.g., new school and administrative facilities, whole site modernizations, upgrades of existing school and administrative sites, joint-use facilities) could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

**Impact-AQ-15: Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of Buildout of the Proposed Program.** Construction activities associated with the Proposed Program (e.g., new school and administrative facilities, whole site modernizations, upgrades of existing school and administrative sites, joint-use facilities) that do not meet the screening criteria presented in Tables 4.2-13 and 4.2-14 could result in toxic air contaminant (TAC) emissions that exceed health risk thresholds. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

Additional emissions generated by new stationary sources and vehicle trips could expose receptors to cancer and non-cancer risks in excess of thresholds per San Diego Air Pollution Control District (SDAPCD) Rule 1200. However, as described above, the Public Resources Code would ensure that receptors at existing schools are not exposed to significant health risks from TAC emissions of new stationary sources. In addition, the Public Resources Code would ensure receptors at new schools would not be exposed to increased emissions from mobile sources from major roadways. The

Proposed Program would also reduce per student vehicle miles traveled (VMT) compared to current conditions. Thus, these impacts would be less than significant.

***Operation***

**Impact-AQ-16: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of Buildout of the Proposed Program.** Operational activities associated with the Proposed Program (e.g., new school and administrative facilities, whole site modernizations, upgrades of existing school and administrative sites, joint-use facilities) could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

### Mitigation Measures

For **Impact-AQ-14:**

Implement **MM-AQ-1** through **MM-AQ-5.**

For **Impact-AQ-15**:

Implement **MM-AQ-1** and **MM-AQ-2.**

For **Impact-AQ-16:**

Implement **MM-AQ-1** through **MM-AQ-5.**

### Level of Significance After Mitigation

***Construction***

Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during construction could exceed the District's thresholds for the purposes of this analysis. Accordingly, implementation of the Proposed Program could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-14** would be significant and unavoidable.

Projects that do not exceed the screening criteria presented in Tables 4.2-13 and 4.2-14 would not result in construction-related health risks that would exceed thresholds. Impacts would be less than significant, and a project-specific emissions inventory and/or health risk assessment would not be required for the project-level environmental analysis.

Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction DPM emissions for major construction projects that do not meet the health risk screening criteria presented in Tables 4.2-13 and 4.2-14. However, the extent of the reductions is unknown. Therefore, after mitigation, **Impact-AQ-15** would be significant and unavoidable, and a project-specific emissions inventory and/or health risk assessment would be required for the project-level environmental analysis to determine project-specific health risks.

***Operation***

Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during long-term operation could exceed the District's thresholds for the purposes of this analysis. Accordingly, implementation of the Proposed Program could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-16** would be significant and unavoidable.

Operational emissions from TAC emissions were determined to be less than significant prior to mitigation.

# Site-Specific Analysis

## Impact Discussion

### Construction

Near-term, site-specific whole site modernization projects (see Chapter 3, *Project Description*) that do not exceed the construction health risk screening criteria presented in Table 4.2-13 would result in less-than-significant health risk impacts. Projects that do not meet the screening criteria could potentially result in construction-related health risks in excess of thresholds and should conduct a project-specific health risk assessment (**Impact-AQ-17**).

Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during construction and long-term operation could exceed the District's thresholds for the purposes of this analysis. Accordingly, new school or administrative facilities, whole site modernizations, and upgrades of existing school and administrative sites could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-17** would be significant and unavoidable.

Construction activities associated with the near-term, site-specific whole site modernization projects that do not meet the screening criteria presented in Tables 4.2-13 and 4.2-14 could result in TAC emissions that exceed health risk thresholds. These emissions could contribute to ozone formation and other air pollution in the SDAB, which at certain concentrations can contribute to short- and long-term human health effects.

Additional emissions generated by new stationary sources and vehicle trips could expose receptors to cancer and non-cancer risks in excess of thresholds per San Diego Air Pollution Control District (SDAPCD) Rule 1200. However, as described above, the Public Resources Code would ensure that receptors at existing schools are not exposed to significant health risks from TAC emissions of new stationary sources. In addition, the Public Resources Code would ensure receptors at new schools would not be exposed to increased emissions from mobile sources from major roadways. The Proposed Program would also reduce per student vehicle miles traveled (VMT) compared to current conditions. Thus, these impacts would be less than significant (**Impact-AQ-18**).

Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction DPM emissions for major construction projects that do not meet the health risk screening criteria presented in Tables 4.2-13

and 4.2-14. However, the extent of the reductions is unknown. Therefore, after mitigation, **Impact-AQ-18** would be significant and unavoidable, and a project-specific emissions inventory and/or health risk assessment would be required for the project-level environmental analysis to determine project-specific health risks.

### Operation

As discussed under *Threshold 2*, long-term operation of new school or administrative facilities, whole site modernizations, or upgrades to existing school and administrative facilities could result in a net increase of criteria pollutant emissions in excess of the thresholds, which were developed using the SDAPCD AQIA trigger levels, and would thus contribute a significant level of air pollution within the SDAB during operations (**Impact-AQ-19**). Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during long-term operation could exceed the District's thresholds for the purposes of this analysis. Accordingly, new school or administrative facilities, whole site modernizations, or upgrades to existing school and administrative facilities could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-19** would be significant and unavoidable.

Existing rules and regulations, such as the Public Resources Code, would ensure that receptors at existing schools are not exposed to significant health risks from TAC emissions of new stationary sources. In addition, near-term, site-specific whole site modernization projects would also reduce per student VMT from current conditions and not exacerbate existing cumulative health risks from mobile travel. These impacts would be less than significant.

## Level of Significance Prior to Mitigation

### Construction

**Impact-AQ-17: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of Near-Term, Site-Specific Whole Site Modernization Projects.** Construction and operational activities associated with the near-term, site-specific whole site modernization projects could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

**Impact-AQ-18: Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of Near-Term, Site-Specific Whole Site Modernization Projects.** Construction activities associated with the near-term, site-specific whole site modernization projects that do not meet the screening criteria presented in Table 4.2-13 could result in Toxic Air Contaminant (TAC) emissions that exceed health risk thresholds. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

Additional emissions generated by new stationary sources and vehicle trips could expose receptors to cancer and non-cancer risks in excess of thresholds per San Diego Air Pollution Control District (SDAPCD) Rule 1200. However, as described above, the Public Resources Code would ensure that receptors at existing schools are not exposed to significant health risks from TAC emissions of new

stationary sources. In addition, the Public Resources Code would ensure receptors at new schools would not be exposed to increased emissions from mobile sources from major roadways. The Proposed Program would also reduce per student vehicle miles traveled (VMT) compared to current conditions. Thus, these impacts would be less than significant.

### Operation

**Impact-AQ-19: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of Near-Term, Site-Specific Whole Site Modernization Projects.** Operational activities associated with the near-term, site-specific whole site modernization projects could result in emissions exceeding thresholds presented in Table 4.2-5, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

## Mitigation Measures

For **Impact-AQ-17:**

Implement **MM-AQ-1** through **MM-AQ-5**.

For **Impact-AQ-18:**

Implement **MM-AQ-1** and **MM-AQ-2**, as described above**.**

For **Impact-AQ-19:**

Implement **MM-AQ-1** through **MM-AQ-5,** as described above.

## Level of Significance After Mitigation

### Construction

Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during construction and long-term operation could exceed the District's thresholds for the purposes of this analysis. Accordingly, implementation of near-term, site-specific whole site modernization projects could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-17** would be significant and unavoidable.

Near-term, site-specific whole site modernization projects that meet the screening criteria presented in Table 4.2-13 would not result in construction-related health risks that would exceed thresholds. Impacts would be less than significant, and a project-specific emissions inventory and/or health risk assessment would not be required for the project-level environmental analysis.

Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction DPM emissions for major construction projects that do not meet the health risk screening criteria presented in Table 4.2-13. However, the extent of the reductions is unknown. Therefore, after mitigation, **Impact-AQ-18** would be significant and unavoidable, and a project-specific emissions inventory and/or health risk assessment would be required for the project-level environmental analysis to determine project-specific health risks.

### Operation

Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. Even with mitigation, VOC, $NO_X$, and PM emissions during long-term operation could exceed the District's thresholds for the purposes of this analysis. Accordingly, new school or administrative facilities, whole site modernizations, or upgrades to existing school and administrative facilities could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, after mitigation, **Impact-AQ-19** would be significant and unavoidable.

Emissions from TAC emissions were determined to be less than significant prior to mitigation.

***Threshold 4: Would the Proposed Program result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***

## Program-Level Analysis

CARB (2005) has identified the following types of land uses as being commonly associated with odors. Although this list is not exhaustive, it is intended to help lead agencies recognize the types of facilities where more analysis may be warranted.

- Sewage Treatment Plans
- Coffee Roasters
- Asphalt Plants
- Metal Smelters
- Landfills
- Recycling Facilities
- Waste Transfer Stations
- Petroleum Refineries
- Biomass Operations
- Autobody Shops
- Coating Operations
- Fiberglass Manufacturing
- Foundries
- Rendering Plants
- Livestock Operations

Projects that would add any of the common odor-generating land uses could result in significant odor impacts when nearby sensitive receptors are present. However, these projects typically fall under the regulations of the SDAPCD and require local permits, or are subject to ongoing monitoring and enforcement by SDAPCD to avoid impacts. The following discusses potential odor impacts during construction and operation of the Proposed Program.

## New Acquisition and New School or Administrative Facilities

### Impact Discussion

#### *Construction*

Potential odor sources during construction of new school or administrative facilities include diesel exhaust, asphalt paving, and the use of architectural coatings and solvents. Some construction projects (e.g., new school construction) may require longer construction durations with more heavy-duty equipment, but all construction activities would be temporary. Odors dissipate as a function of distance, and construction activities would not be likely to result in nuisance odors that would violate SDAPCD Rule 51. Given mandatory compliance with SDACPD rules, construction activities would not create a significant level of objectionable odors. Impacts would be less than significant.

#### *Operation*

The Proposed Program includes future sensitive receptors (e.g., students) at schools. CARB generally discourages siting new schools within 1,000 feet of odor-generating facilities. However, without specific details on the locations of new schools, determining whether new schools would be located within 1,000 feet of odor-generating facilities and whether these facilities have received odor complaints would be speculative. Therefore, operational odor impacts associated with new school or administrative facilities are conservatively assumed to be significant (**Impact-AQ-20**).

Implementation of **MM-AQ-6** would ensure that new schools would not be constructed within 1,000 feet of existing odor-generating facilities. Therefore, with mitigation, operational impacts associated with new acquisition and new school or administrative facilities (**Impact-AQ-20)** would be reduced to less-than-significant levels.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with new acquisition and new school or administrative facilities would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, with mandatory compliance with SDAPCD Rule 51. This impact would be less than significant.

#### *Operation*

**Impact-AQ-20: Potential to Result in Other Emissions (Such as Those Leading to Odors) Adversely Affecting a Substantial Number of People During Operation.** Operational activities associated with new acquisition and new school or administrative facilities could result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

### Mitigation Measures

For **Impact-AQ-20:**

> **MM-AQ-6: Site New School Facilities Away from Odor-Generating Facilities.** The District shall prohibit new school construction within 1,000 feet of existing odor-generating facilities, consistent with the California Air Resources Board's *Air Quality Land Use Handbook,* which recommends siting sensitive receptors 1,000 feet away from emission sources.

### Level of Significance After Mitigation

#### *Construction*

Construction impacts associated with new acquisition and new school or administrative facilities were determined to be less than significant prior to mitigation. No mitigation is required.

#### *Operation*

Implementation of **MM-AQ-6** would ensure that new schools would not be constructed within 1,000 feet of existing odor-generating facilities. Therefore, with mitigation, operational impacts associated with new acquisition and new school or administrative facilities (**Impact-AQ-20)** would be reduced to less-than-significant levels.

## Whole Site Modernization and Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Potential odor sources during construction associated with whole site modernization or upgrades of existing school and administrative facilities include diesel exhaust, asphalt paving, and the use of architectural coatings and solvents. Some construction projects (e.g., substantial renovation under a whole site modernization) may require longer construction durations with more heavy-duty equipment, but all construction activities would be temporary. Odors dissipate as a function of distance, and construction activities would not be likely to result in nuisance odors that would violate SDAPCD Rule 51. Given mandatory compliance with SDACPD rules, construction activities would not create a significant level of objectionable odors. Impacts would be less than significant.

#### *Operation*

The Proposed Program includes existing sensitive receptors (e.g., students) at schools. Future projects would be implemented at existing school sites, but existing school sites would meet the state's rigorous siting requirements, where proximity to odor-generating facilities was reviewed. Therefore, odor impacts associated with whole site modernization and upgrades of existing school and administrative sites are not anticipated from these activities. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with whole site modernization and upgrades of existing school and administrative facilities would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, with mandatory compliance with SDAPCD Rule 51. This impact would be less than significant.

#### *Operation*

Operational activities associated with whole site modernization and upgrades of existing school and administrative facilities would not result in substantial odor impacts. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

### Construction

Construction impacts associated with whole site modernization and upgrades of existing school and administrative facilities were determined to be less than significant prior to mitigation.

### Operation

Operational activities impacts associated with whole site modernization and upgrades of existing school and administrative facilities were determined to be less than significant prior to mitigation.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

Potential odor sources during construction activities associated with joint-use facilities include diesel exhaust, asphalt paving, and the use of architectural coatings and solvents. Some construction projects (e.g., new school construction) may require longer construction durations with more heavy-duty equipment, but all construction activities would be temporary. Odors dissipate as a function of distance, and construction activities would not be likely to result in nuisance odors that would violate SDAPCD Rule 51. Given mandatory compliance with SDACPD rules, construction activities would not create a significant level of objectionable odors. Impacts would be less than significant.

#### *Operation*

The Proposed Program would include existing and new operational activities at joint-use facilities. However, odor-generating operational activities (e.g., use of landscaping equipment, exhaust from additional mobile trips) associated with joint-use facilities are anticipated to be minor and temporary in nature. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with joint-use facilities would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, with mandatory compliance with SDAPCD Rule 51. This impact would be less than significant.

#### *Operation*

Operational activities associated with joint-use facilities would not result in substantial odor impacts. Impacts would be less than significant.

#### Mitigation Measures

No mitigation is required.

#### Level of Significance After Mitigation

#### *Construction*

Construction impacts associated with joint-use facilities were determined to be less than significant prior to mitigation.

#### *Operation*

Impacts associated with operational activities of joint-use facilities were determined to be less than significant prior to mitigation.

## Site-Specific Analysis

### Impact Discussion

#### Construction and Operation

As described above, whole site modernization projects would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, with mandatory compliance with SDAPCD Rule 51. Operational activities would not result in odor impacts as the types and intensity of activities would remain basically the same. Impacts related to near-term, site-specific whole site modernization projects would be less than significant.

### Level of Significance Prior to Mitigation

Impacts were determined to be less than significant prior to mitigation.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts were determined to be less than significant prior to mitigation.

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# Section 4.3
# Biological Resources

## 4.3.1 Overview

This section describes the existing conditions and applicable laws and regulations for biological resources, followed by an analysis of the Proposed Program's potential to: (1) have an effect on any species identified as a candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS); (2) have an effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS; (3) have an effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means; (4) interfere with the movement of any native resident or migratory fish or wildlife species, with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; (5) conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and (6) conflict with the provisions of an adopted habitat conservation plan (HCP), natural community conservation plan (NCCP), or other approved local, regional, or state HCP.

Table 4.3-1 summarizes the significant impacts and mitigation measures (MM) discussed in Section 4.3.4.3, *Impacts and Mitigation Measures*.

**Table 4.3-1. Summary of Significant Biological Resources Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact-BIO-1:** Potential to Have a Direct Substantial Adverse Effect on Any Sensitive Species During Construction of New School or Administrative Facilities. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-2:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of New School or Administrative Facilities. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report; **MM-BIO-3**: Comply With the City's Multi-Habitat Planning | Less than Significant | **MM-BIO-1** through **MM-BIO-3** would require identification of biological resources on and near the project sites, and implementation of measures, including measures from the |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | Area Adjacency Guidelines. | | MHPA Adjacency Guidelines, that would avoid impacts on sensitive species. |
| **Impact-BIO-3:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of New School or Administrative Facilities. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-4:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Operation of New School or Administrative Facilities. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report; **MM-BIO-3**: Comply With the City's Multi-Habitat Planning Area Adjacency Guidelines. | Less than Significant | **MM-BIO-1** through **MM-BIO-3** would require identification of biological resources on and near the project sites, and implementation of measures, including measures from the MHPA Adjacency Guidelines, that would avoid impacts on sensitive species. |
| **Impact-BIO-5:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Operation of New School or Administrative Facilities. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-16:** Potential to Have an Adverse Effect on Any Riparian or Other Sensitive Vegetation Community Identified in Local or Regional Plans, Policies, or Regulations, or by the California Department of Wildlife or U.S. Fish and Wildlife Service. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report; **MM-HWQ-1**: Implement Construction Best Management Practices. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. **MM-HWQ-1** requires a variety of construction |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | Best Management Practices to be implemented throughout the various construction phases in order to protect water quality. |
| **Impact-BIO-17:** Potential to Have an Adverse Effect on State or Federally Protected Wetlands (Including, But Not Limited to, Marshes, Vernal Pools, and Coastal Wetlands) Through Direct Removal, Filling, Hydrological Interruption, or Other Indirect Means. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-19**: Potential to 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 During Construction. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-21:** Potential to Conflict With Any Local Policies or Ordinances Protecting Biological Resources, Such as a Tree Preservation Policy or Ordinance, During Construction. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report; **MM-BIO-3**: Comply With the City's Multi-Habitat Planning Area Adjacency Guidelines; **MM-BIO-4**: Obtain a Tree Removal Permit and Provide Compensatory Mitigation. | Less than Significant | **MM-BIO-1** through **MM-BIO-3** would require identification of biological resources on and near the project sites, and implementation of measures, including measures from the MHPA Adjacency Guidelines, that would avoid impacts on sensitive species. **MM-BIO-4** requires that the District avoid and mitigate for impacts on protected trees. |
| **Whole Site Modernization** | | | |
| **Impact-BIO-6:** Potential to Have a Direct Substantial Adverse Effect on Any | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| Sensitive Species During Construction of Whole Site Modernization Projects**.** | Biological Resources Technical Report. | | biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-7:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Whole Site Modernization Projects. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report; **MM-BIO-3**: Comply With the City's Multi-Habitat Planning Area Adjacency Guidelines. | Less than Significant | **MM-BIO-1** through **MM-BIO-3** would require identification of biological resources on and near the project sites, and implementation of measures, including measures from the MHPA Adjacency Guidelines, that would avoid impacts on sensitive species. |
| **Impact-BIO-8:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of Whole Site Modernization Projects. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-9:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Operation of Whole Site Modernization Projects. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report; **MM-BIO-3**: Comply With the City's Multi-Habitat Planning Area Adjacency Guidelines. | Less than Significant | **MM-BIO-1** through **MM-BIO-3** would require identification of biological resources on and near the project sites, and implementation of measures, including measures from the MHPA Adjacency Guidelines, that would avoid impacts on sensitive species. |
| **Impact-BIO-10:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Operation of Whole Site Modernization Projects. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-18**: Potential to Have an Adverse Effect on State or Federally Protected Wetlands (Including, But Not Limited to, Marshes, Vernal Pools, and Coastal Wetlands) Through Direct Removal, Filling, Hydrological Interruption, or Other Indirect Means. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-20:** Potential to 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 During Construction. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Upgrades of Existing School and Administrative Sites** | | | |
| **Impact-BIO-11:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report; **MM-BIO-3**: Comply With the City's Multi-Habitat Planning Area Adjacency Guidelines. | Less than Significant | **MM-BIO-1** through **MM-BIO-3** would require identification of biological resources on and near the project sites, and implementation of measures, including measures from the MHPA Adjacency Guidelines, that would avoid impacts on sensitive species. |
| **Impact-BIO-12:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-BIO-20:** Potential to 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 During Construction. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| **Impact-BIO-11:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities**.** | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report; **MM-BIO-3**: Comply With the City's Multi-Habitat Planning Area Adjacency Guidelines. | Less than Significant | **MM-BIO-1** through **MM-BIO-3** would require identification of biological resources on and near the project sites, and implementation of measures, including measures from the MHPA Adjacency Guidelines, that would avoid impacts on sensitive species. |
| **Impact-BIO-12:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-13:** Potential to Have a Direct Substantial Adverse Effect on Any Sensitive Species During Construction of Joint-Use Facilities. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-14:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources | Less than Significant | **MM-BIO-1** through **MM-BIO-3** would require identification of biological resources |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| During Operation of Joint-Use Facility Projects. | Technical Report; **MM-BIO-3**: Comply With the City's Multi-Habitat Planning Area Adjacency Guidelines | | on and near the project sites, and implementation of measures, including measures from the MHPA Adjacency Guidelines, that would avoid impacts on sensitive species. |
| **Impact-BIO-15:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Operation of Joint-Use Facility Projects. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-18**: Potential to Have an Adverse Effect on State or Federally Protected Wetlands (Including, But Not Limited to, Marshes, Vernal Pools, and Coastal Wetlands) Through Direct Removal, Filling, Hydrological Interruption, or Other Indirect Means. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-20:** Potential to 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 During Construction. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| **Impact-BIO-6:** Potential to Have a Direct Substantial Adverse Effect on Any Sensitive Species During Construction of Whole Site Modernization Projects | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | avoid impacts on sensitive species. |
| **Impact-BIO-7:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Whole Site Modernization Projects. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report; **MM-BIO-3**: Comply With the City's Multi-Habitat Planning Area Adjacency Guidelines. | Less than Significant | **MM-BIO-1** through **MM-BIO-3** would require identification of biological resources on and near the project sites, and implementation of measures, including measures from the MHPA Adjacency Guidelines, that would avoid impacts on sensitive species. |
| **Impact-BIO-8:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of Whole Site Modernization Projects. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-9:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Operation of Whole Site Modernization Projects. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report; **MM-BIO-3**: Comply With the City's Multi-Habitat Planning Area Adjacency Guidelines. | Less than Significant | **MM-BIO-1** through **MM-BIO-3** would require identification of biological resources on and near the project sites, and implementation of measures, including measures from the MHPA Adjacency Guidelines, that would avoid impacts on sensitive species. |
| **Impact-BIO-10:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Operation of Whole Site Modernization Projects. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-BIO-18**: Potential to Have an Adverse Effect on State or Federally Protected Wetlands (Including, But Not Limited to, Marshes, Vernal Pools, and Coastal Wetlands) Through Direct Removal, Filling, Hydrological Interruption, or Other Indirect Means. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |
| **Impact-BIO-20:** Potential to 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 During Construction. | **MM-BIO-1**: Prepare a Desktop Analysis; **MM-BIO-2**: Prepare a Biological Resources Technical Report. | Less than Significant | **MM-BIO-1** and **MM-BIO-2** would require identification of biological resources on and near the project sites, and implementation of measures that would avoid impacts on sensitive species. |

## 4.3.2 Existing Conditions

The following sections outline existing conditions within the Proposed Program area. The District is primarily within the boundaries of the City of San Diego, but also includes a small portion of the City of La Mesa, the City of Lemon Grove, and unincorporated San Diego County. However, all existing District facilities are within the boundaries of the City of San Diego.

Section 4.3.2.1 describes District-wide existing biological conditions, including all land within the District boundary, regardless of land ownership. These conditions would be most relevant for New Acquisition and New School or Administrative Facilities Construction projects that would involve new construction beyond land currently owned by the District. These projects could occur anywhere within the District either on currently developed or undeveloped land.

Section 4.3.2.2 describes District properties' existing biological conditions, including around existing District properties. These conditions would be most relevant for the following project categories: Whole Site Modernization; Upgrades of Existing School and Administrative Sites; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program, as such projects would occur within existing District properties that are largely developed. Therefore, existing biological resources can more accurately be determined.

# 4.3.2.1 District-Wide

As discussed in Section 4.3.2 above, the following existing conditions apply to the entire District.

## Vegetation Communities

The following vegetation communities were identified in the City of San Diego Municipal Code Land Development Code: Biology Guidelines as occurring within the City of San Diego boundaries and may therefore be present within or adjacent to an existing or future District facility. As noted in Section 4.3.2, all existing District facilities are within the boundaries of the City of San Diego. Therefore, only vegetation communities within the City of San Diego were identified. However, not all vegetation communities within the City of San Diego may exist within the Proposed Program area. Descriptions of each vegetation community were derived from *Draft Vegetation Communities of San Diego County* (Oberbauer et al. 2008).

### Disturbed Wetland (11200)[1]

Disturbed wetland is characterized by areas permanently or periodically inundated by water that have been significantly modified by human activity. This can include portions of wetlands with obvious artificial structures. They are often unvegetated but may contain scattered native or nonnative vegetation.

### Disturbed Habitat (11300)

Disturbed habitat supports either no vegetation or a cover of nonnative weedy species that are adapted to a regime of frequent human disturbance. Many of the characteristic species of this habitat are also indicator species of annual grasslands, although disturbed areas tend to be dominated more by forbs than grasses. Characteristic species may include tumbleweed (*Salsola tragus*), tocalote (*Centaurea melitensis*), Italian thistle (*Carduus pycnocephalus*), bristly ox-tongue (*Helminthotheca echioides*), and African crown daisy (*Glebionis coronaria*).

### Urban/Developed (12000)

Urban/developed areas have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. Developed land is characterized by permanent or semi-permanent structures, pavement or hardscape, and landscaped areas of ornamental vegetation that often require irrigation. The majority of District properties are entirely urban/developed.

### Agriculture (18000)

Lands that support an active agricultural operation.

### Southern Foredunes (21230)

Southern foredunes are dominated by succulent, perennial herbs and subshrubs.

[1] Numbers represent vegetation classification as specified in *Draft Vegetation Communities of San Diego County* (Oberbauer et al. 2008)

## Southern Coastal Bluff Scrub (31200)

Southern coastal bluff scrub is a low scrub up to 2 meters tall that forms continuous mats. This community tends to be scattered. Dwarf shrubs, herbaceous perennials, and annuals are represented, with most being woody and/or succulent. Flowering occurs from later winter through spring. In San Diego County, this community is found in Torrey Pines State Reserve, at Pt. Loma, and at offshore islands.

## Maritime Succulent Scrub (32400)

Maritime succulent scrub is a low, open scrub community dominated by a mixture of succulent, drought-deciduous species that may also occur within sage scrub communities. This vegetation community typically occurs on thin, sandy, or rocky soils on steep slopes of coastal headlands and bluffs. Maritime succulent scrub is restricted to within a few miles of the coast from approximately Torrey Pines to Baja California, Mexico, and also occurs on San Clemente and Catalina Islands. The dominant species found within this community typically include San Diego barrel cactus (*Ferocactus viridescens*), velvet cactus (*Bergerocactus emoryi*), prickly pear cactus (*Opuntia littoralis*), cliff spurge (*Euphorbia misera*), dudleya (*Dudleya* spp.), California box-thorn (*Lycium californicum*), and California encelia (*Encelia californica*).

## Diegan Coastal Sage Scrub (32500)

Diegan coastal sage scrub is a scrub community consisting of low, soft-leaved woody subshrubs, with few over 1 meter high. Most species are active in winter and early spring and are drought deciduous in late spring or early summer. This community is most often dominated by California sagebrush (*Artemisia californica*) and California buckwheat (*Eriogonum fasciculatum*).

## Southern Mixed Chaparral (37120)

Southern mixed chaparral is characterized by 1- to 3-meter-tall broad-leaved sclerophyll shrubs. It relies on dry, rocky, and often steep slopes with little soil and moderate temperatures, and is often adjacent to chamise chaparral. This community is dominated by blue-colored lilacs.

## Chamise Chaparral (37200)

Chamise chaparral is a 1- to 3-meter-tall chaparral overwhelmingly dominated by chamise. Associated species contribute little to cover. This community is adapted to repeated fires through stump sprouting. Mature stands are densely interwoven with very little herbaceous understory or litter.

## Scrub Oak Chaparral (37900)

Scrub oak chaparral consists of a dense, evergreen chaparral up to 20 feet tall dominated by interior scrub oak. The scrub oak chaparral in San Diego County consists of dense patches of California scrub oak (*Quercus berberidifolia*) interspersed with open areas vegetated with herbaceous species. Dominating the understory and openings are nonnative grasses and herbs, including soft chess (*Bromus hordeaceus*), foxtail chess (*Bromus rubens*), and red-stemmed filaree (*Erodium cicutarium*).

## Southern Maritime Chaparral (37C30)

Southern maritime chaparral is a low, fairly open chaparral dominated by wart-stemmed ceanothus (*Ceanothus verrucosus*) and Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *Crassifolia*). Many of the characteristic species rely on fires for continued reproduction. In San Diego, it is restricted to coastal areas and scattered throughout these areas.

## Coastal Sage-Chaparral Transition (37G00)

Coastal sage-chaparral is a transitional community containing a mix of sclerophyllous, woody chaparral species and drought-deciduous, malacophyllous sage scrub species. The dominant plant species for this community include chamise (*Adenostoma fasciculatum*) and California sagebrush (*Artemisia californica*), which are generally equal in cover. Laurel sumac (*Malosma laurina*), black sage (*Salvia mellifera*), and lemonade berry (*Rhus integrifolia*) are more common in coastal sage scrub, while *Ceanothus* species and Mission manzanita (*Xylococcus bicolor*) are more common in chaparrals.

## Native Grassland (42100)

Native grasslands are composed mostly of perennial grasses and herbs. Nonnative species may be present within the community, but native grasslands can include the Valley Needlegrass Grasslands (42110), Valley Sacaton Grassland (42120), and Saltgrass Grassland (42130). This vegetation community is present throughout San Diego County, but not as likely to be found within the city of San Diego.

## Nonnative Grasslands (42200)

Nonnative grassland is characterized by a dense to sparse cover of annual grasses reaching up to 1 meter (3 feet), which may include numerous native wildflowers, particularly in years of high rainfall. These annuals germinate with the onset of the rainy season and set seeds in the late spring or summer. This community is usually found on fine-textured soils that proceed from moist or waterlogged in the winter to very dry during the summer and fall (Holland 1986). Nonnative grasslands, in many circumstances, have replaced native grasslands as a result of disturbance (directly manmade [e.g., mechanical disturbance, grazing] or natural [e.g. altered fire cycles]).

## Freshwater Marsh (52400)

Freshwater marsh communities are found in areas permanently inundated or flooded by fresh water, lacking significant current from water movement. Prolonged saturation in these communities allows for the accumulation of deep, peaty soils. Freshwater marshes are usually located in the coastal valleys near river mouths and around the margins of lakes and springs. Freshwater marsh is dominated by perennial, emergent monocots, typically ranging from 1.2 to 1.5 meters (4 to 5 feet) tall. Typically, species of cattails (*Typha* spp.) and bulrush (*Schoenoplectus* spp.) dominate this community.

## Riparian Habitats (60000)

Riparian habitat in San Diego County includes Southern Riparian Forest (61300), Southern Riparian Woodland (62500), and Southern Riparian Scrub (63300). These vegetation communities can be found throughout San Diego County. Southern riparian forest is dominated by trees including

western sycamores (*Platanus racemosa*) and cottonwoods (*Populus* spp.). Southern riparian woodland is dominated by broom baccharis (*Baccharis sarothroides*), western sycamores, cottonwoods, willows (*Salix* spp.) and elderberry (*Sambucus* spp.). Southern riparian scrub is dominated by Arroyo willow (*Salix lasiolepis*), willows, and broom baccharis.

### Southern Coast Live Oak Riparian Forest (61310)

Southern coast live oak riparian forest is a dense riparian forest dominated by evergreen, sclerophyllous trees with a closed or nearly closed canopy. This community has fewer understory shrubs than other riparian communities. It is found at bottomlands and outer floodplains along larger streams on fine-grained, rich alluvium and in many drainages throughout San Diego County.

### Mule Fat Scrub (63310)

Mule fat scrub is a shrubby riparian scrub community dominated by mule fat (*Baccharis salicifolia*) and occasionally interspersed with small willows (*Salix* spp.). This vegetation community occurs along intermittent stream channels with a coarse substrate and moderate water depth, along areas with shallow groundwater, or areas that receive runoff from roads and other structures (Holland 1986). In some environments, limited hydrology may favor the persistence of mule fat.

### Coast Live Oak Woodlands (71160)

Coast live oak woodland is typically dominated by coast live oak (*Quercus agrifolia*) trees, which reach 9 to 24 meters (30 to 80 feet) in height. The shrub layer within this vegetation community is usually poorly developed while the herb layer is continuous and typically dominated by nonnative grasses. This community typically occurs on north-facing slopes and within shaded ravines in Southern California (Holland 1986).

### Eucalyptus Woodland (79100)

Eucalyptus woodland is a nonnative woodland habitat that can be single trees with little to no shrubby understory to scattered trees with well-developed shrubby understory. Eucalyptus species hinder the ability of other species being able to grow due to the large amounts of leaf and bark litter produced by eucalyptus.

### Torrey Pines Forest (83140)

Torrey Pine forest is dominated by Torrey pines (*Pinus torreyana*) and is an open to moderately dense forest. Understory can vary from almost bare to being dense with chaparral or grasses and shrubs. Needles accumulate on the ground when dense tree canopies occur. One natural stand within the city of San Diego occurs in the vicinity of Torrey Pines State Reserve.

### Vernal Pools (44000)

Vernal pools are seasonally flooded depressions that support a distinctive living community adapted to extreme variability in hydrologic conditions including seasonally very dry and very wet conditions. They often retain pooled water for at least 2 weeks after significant rain events. Vernal pools can be identified by basins that are partially vegetated or unvegetated due to heavy clay or hardpan during the normal growing season. Indicator species for vernal pools include *Psilocarphus* species, toothed calicoflower (*Downingia cuspidata*), and California eryngo (*Eryngium aristulatum*).

## Open Space

The Proposed Program area is within the City of San Diego's Multiple Species Conservation Program (MSCP). The MSCP is a long-term regional conservation plan to aid establishment of a connected preserve system throughout San Diego County. The City's Subarea Plan (City of San Diego 1997) establishes the City's Multi-Habitat Planning Area (MHPA) preserve system. The MHPA consists of areas throughout the city designated as high-quality habitat. Because of the city's geography of many mesas and canyons and the high percentage of developed land, much of the MHPA consists of interconnected canyons on undevelopable areas throughout the city.

Additionally, the City's Environmentally Sensitive Lands Ordinance requires the overall protection of biological resources within the city and ensures implementation of the MSCP Subarea Plan. Specifically, environmentally sensitive lands (ESLs) include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and special flood hazard areas.

The City adopted the Public Tree Protection policy (Policy No. 900-19) in 2005. The Community Forest Advisory Board worked with City staff to prepare the policy to protect designated tree resources in public rights-of-way, on City-owned open space, in parks, or on other publicly owned lands. As District lands are public lands, this policy would apply to the Proposed Program. Trees protected through this policy occurring throughout the District include landmark trees, heritage trees, parkway resource trees, and preservation groves.

## Habitat Connectivity/Wildlife Movement Corridors

Wildlife movement corridors are large swaths of undeveloped land that provide suitable conditions for wildlife movement without interruption from human disturbances. Lands available and suitable for wildlife corridors within the Proposed Program area are greatly reduced due to development. Corridors within the Proposed Program area are mostly limited to isolated canyons providing limited wildlife habitat connectivity. Los Peñasquitos Canyon is a suitable wildlife corridor, providing connectivity from coastal lands to inland eastern San Diego. The Proposed Program area consists largely of urban areas within the city and not near wildlife corridors. However, Los Peñasquitos Canyon is situated on the northern border of the District boundary and abuts the Mira Mesa and Scripps Ranch clusters. Specifically, within the Mira Mesa cluster, Challenger Middle School abuts the canyon, and Sandburg and Hickman Elementary schools are situated nearby. In addition, Scripps Elementary, within the Scripps Ranch cluster, is also located near the canyon.

## Aquatic Resources

Aquatic resources represent aquatic features including but not limited to wetlands, rivers, streams, and riparian habitat that may be sensitive and subject to the U.S. Army Corps of Engineers, Regional Water Quality Control Board (RWQCB), and/or CDFW jurisdiction. Jurisdictional waters occur throughout the Proposed Program area.

## Sensitive Species

The California Natural Diversity Database (CNDDB) lists 138 plant and wildlife species that may be found within or near the Program area (CDFW 2019). This includes 70 plant species, 18 bird species, 15 mammal species, 14 invertebrate species, 10 reptile species, and one amphibian species. The full CNDDB list can be found in Appendix E. The following 10 priority plant communities are listed as within the District, and are described in Section 4.3.2.1 above:

- Maritime Succulent Scrub
- Southern Maritime Chaparral
- Valley Needlegrass Grassland
- San Diego Mesa Hardpan Vernal Pool
- Southern Coastal Salt Marsh
- Southern Riparian Forest
- Southern Cottonwood Willow Riparian Forest
- Southern Sycamore Alder Riparian Woodland
- Southern Riparian Scrub
- Torrey Pine Forest

# 4.3.2.2 District Property–Specific

As discussed in Section 4.3.2, the following existing conditions apply to existing District properties.

## Open Space

The majority of District properties are within developed, urban areas that are not near any MHPA lands. However, 22 District properties are adjacent to MHPA lands, including 16 where MHPA land encroaches onto the property to some extent. Section 1.4.3 of the City's MSCP Subarea Plan outlines Land Use Adjacency Guidelines, which any land use planned or existing adjacent to the MHPA must adhere to in order to minimize impacts and maintain the function of the MHPA. District properties adjacent to MHPA lands may also be situated adjacent to ESLs. Additionally, trees designated for protection through the City's Public Tree Protection policy may occur near or on District properties or at new site acquisitions for future District sites. Table 4.3-2 identifies existing District properties that are adjacent to MHPA lands, and Figures 4.3-1 through 4.3-17 identify MHPA lands by cluster.

**Table 4.3-2. MHPA-Adjacent School Sites**

| School Cluster | Schools Sites Adjacent to MHPA Lands |
|---|---|
| Clairemont Cluster | Holmes Elementary |
| Crawford Cluster | Carver Elementary |
| Henry | Henry High |
| Kearny | Cubberly Elementary/Kavod Elementary |
| | Kearny High School Complex |
| | Taft Middle |
| Lincoln | Valencia Park Elementary |
| Madison | Creative Performing and Media Arts Middle |
| | Whitman Elementary |
| Mira Mesa | Challenger Middle |
| | Jonas Salk Elementary |
| Scripps Ranch | Jerabek Elementary |

| School Cluster | Schools Sites Adjacent to MHPA Lands |
|---|---|
| Serra | De Portola Middle |
| | Farb Middle |
| | Serra High |
| | Vista Grande Elementary |
| University City | Spreckels Elementary |
| | Standley Middle |
| | University City High |

Source: City of San Diego 1997.

## Vegetation Communities

Existing facilities within the Proposed Program area are almost entirely developed and graded within urban areas of the District. They are dominated by pavement, permanent structures, and ornamental vegetation that likely requires irrigation. Therefore, District properties are mostly categorized by the Urban/Developed (12000) vegetation community. Graded areas are likely to not contain any native vegetation communities, as they have been altered by human disturbance. Properties with or adjacent to untouched hillsides and canyons may contain diverse vegetation communities including grasslands, chaparral, or coastal sage scrub. Properties with flatter open space on site may contain riparian/wetlands. Table 4.3-3 identifies existing District properties that contain or are adjacent to native vegetation or open spaces. In addition, Figures 4.3-1 through 4.3-17 show school properties containing or adjacent to CNDDB plant and wildlife species.

**Table 4.3-3. Existing Schools With or Adjacent to Potential Native Vegetation or Open Space**

| School Cluster | School Sites |
|---|---|
| Clairemont Cluster | Alcott Elementary |
| | Cadman Elementary |
| | Clairemont High |
| Crawford Cluster | Crawford High |
| | Darnall K-8 |
| | Marshall Elementary |
| | Rolando Park Elementary |
| Henry Cluster | Dailard Elementary |
| | Hardy Elementary |
| | Lewis Middle |
| | Marvin Elementary |
| Hoover Cluster | Hamilton Elementary |
| | Rowan Elementary |
| Kearny Cluster | Fletcher Elementary |
| | Twain High |
| La Jolla Cluster | La Jolla Elementary |
| | Muirlands Middle |
| | Torrey Pines Elementary |

| School Cluster | School Sites |
|---|---|
| Lincoln Cluster | Chollas/Mead Elementary |
| | Horton Elementary |
| | Johnson Elementary |
| | Knox Middle |
| | Millennial Tech High |
| | Nye Elementary |
| Madison Cluster | Field Elementary |
| Mira Mesa Cluster | Sandburg Elementary |
| Mission Bay | Sessions Elementary |
| Morse Cluster | Audubon K-8 |
| | Bell Middle |
| | Bethune K-8 |
| | Boone Elementary |
| | Fulton K-8 |
| | Keiller Leadership Academy |
| | Morse High |
| | Penn Elementary |
| | Perry Elementary |
| | San Diego SCPA |
| Point Loma | Correia Middle |
| | Dana Middle |
| | Sunset View Elementary |
| San Diego Cluster | Golden Hill K-8 |
| | Grant K-8 |
| Scripps Ranch | Dingeman Elementary |
| | Marshall Middle |
| | Miramar Ranch Elementary |
| | Scripps Ranch High |
| Serra | Elevate Elementary |
| | Hancock Elementary |
| | Kumeyaay Elementary |
| University City | Curie Elementary |

Source: CDFW 2019.

## Habitat Connectivity/Wildlife Movement Corridors

Existing District properties are largely developed and in urban areas, and no property contains migratory wildlife corridors, nursery sites, or streams or bodies of water that may be inhabited by native resident or migratory fish species. Existing District properties contain ornamental trees and vegetation that can provide suitable nesting habitat for migratory bird and raptor species. Some properties lie adjacent to open space that may provide habitat for wildlife; however, these are mostly limited to canyons and drainages within the District that do not have connectivity outside of the urban area. One property, Challenger Middle School, is adjacent to a canyon that provides

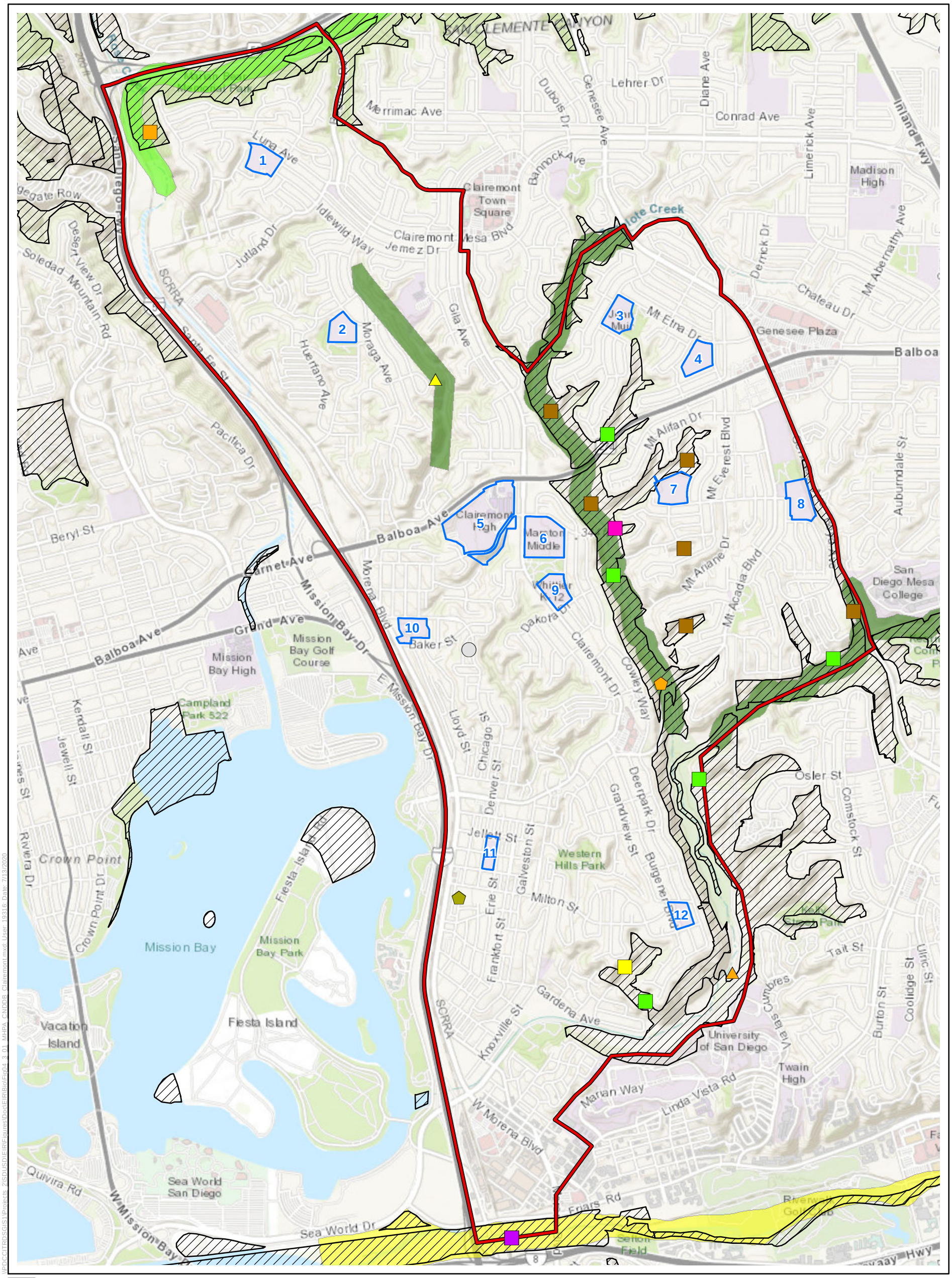
connectivity to the Los Peñasquitos Canyon wildlife corridor. This canyon contains the District-maintained McAuliffe vernal pool mitigation site, a 12.7-acre area consisting of a large, flat mesa and one side of the steep canyon located south of Challenger Middle School. The site was established to restore, enhance, and preserve vernal pool habitat as mitigation for construction of the Salk Elementary School (District 2012).

## Aquatic Resources

District properties are predominantly on developed land in urbanized areas, and do not contain state or federally protected wetlands. Several District properties lie adjacent to MHPA lands, which can support riparian habitat and other aquatic resources. Some properties contain canyons and other geographic features suitable for drainages that may contain jurisdictional waters. Desktop analysis identified potential aquatic resources for the Proposed Program, though project-specific aquatic resource analysis is not included in this program-level analysis. Additional project-level analysis including field visits may reveal additional aquatic resources within District properties.

## Sensitive Species

Plant and wildlife species surveys were not performed on District properties as part of the Proposed Program analysis. In general, sensitive plant and wildlife species are not expected to be present within the majority of properties located within urban areas, as the properties are largely developed. However, as shown in Tables 4.3-2 and 4.3-3 and Figures 4.3-1 through 4.3-17, some District properties could be adjacent to areas containing sensitive species.




- Cluster Boundaries
- School Boundary

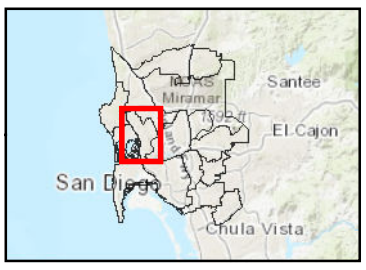
Schools

1 - Alcott Elementary
2 - Cadman Elementary
3 - John Muir
4 - Mt. Everest Academy
5 - Clairemont High
6 - Marston Middle
7 - Holmes Elementary
8 - Riley/New Dawn
9 - Whittier K-12
10 - Toler Elementary
11 - Bay Park Elementary
12 - Longfellow K-8

- Multiple Habitat Planning Areas

CNDDB

- Southern Cottonwood Willow Riparian Forest
- Southern Riparian Forest
- Southern Riparian Scrub
- Coastal California Gnatcatcher
- Least Bell's Vireo
- Brand's Star Phacelia
- Nuttall's Scrub Oak
- San Diego Barrel Cactus
- San Diego Sagewort
- Coast Woolly-heads
- Sea Dahlia
- South Coast Saltscale
- Big Free-tailed Bat
- Pocketed Free-tailed Bat
- Orange-throated Whiptail
- Southern California Legless Lizard

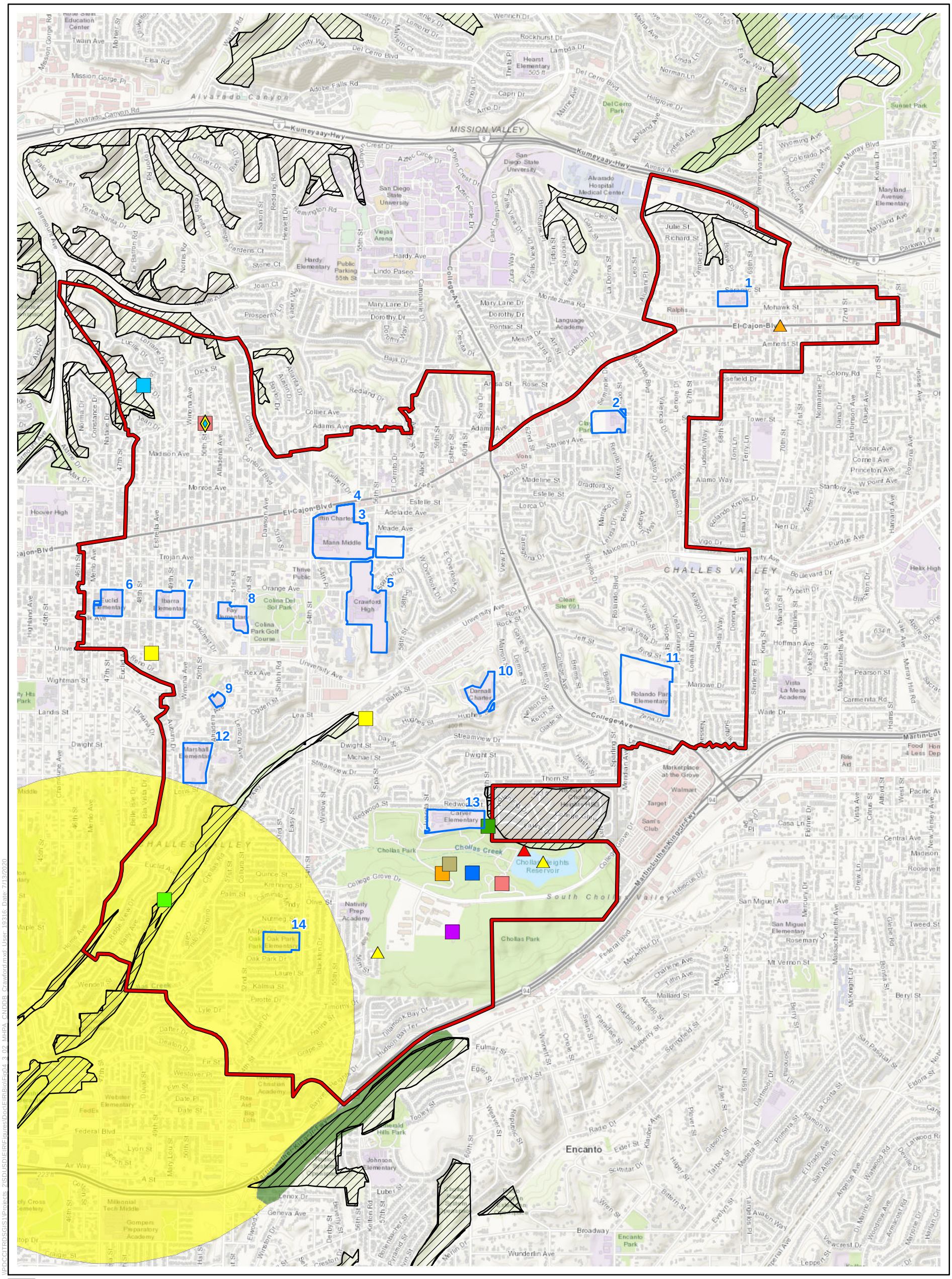



Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

N

**Figure 4.3-1**
**Multiple Habitat Planning Areas & CNDDB - Clairemont Cluster Area**

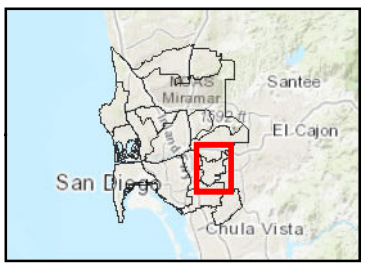



Cluster Boundaries
School Boundary

Schools
- 1 - Harriet Tubman Village Charter
- 2 - Clay Elementary
- 3 - Mann Middle
- 4 - Iftin Charter
- 5 - Crawford High
- 6 - Euclid Elementary
- 7 - Ibarra Elementary
- 8 - Fay Elementary
- 9 - City Heights Preparatory Charter
- 10 - Darnall Charter
- 11 - Rolando Park Elementary
- 12 - Marshall Elementary
- 13 - Carver Elementary
- 14 - Oak Park Elementary

Multiple Habitat Planning Areas

CNDDB
- Southern Riparian Scrub
- Maritime Succulent Scrub
- California Black Rail
- Coastal California Gnatcatcher
- Least Bell's Vireo
- California Adolphia
- Coulter's Goldfields
- Munz's Sage
- San Diego Barrel Cactus
- San Diego Button-celery
- San Diego Mesa Mint
- San Diego Thorn-mint
- Decumbent Goldenbush
- Wart-stemmed Ceanothus
- Orcutt's Brodiaea
- San Diego Goldenstar




Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

N

**Figure 4.3-2**
**Multiple Habitat Planning Areas & CNDDB - Crawford Cluster Area**

Cluster Boundaries
School Boundary

Schools
1 - Dailard Elementary
2 - Gage Elementary
3 - Pershing Middle
4 - Foster Elementary
5 - Lewis Middle
6 - Marvin Elementary
7 - Henry High
8 - Green Elementary
9 - Benchley/Weinberger Elementary
10 - Magnolia Science Academy San Diego
11 - Hearst Elementary
12 - Hardy Elementary
13 - Language Academy

Multiple Habitat Planning Areas

CNDDB
Southern Cottonwood Willow Riparian Forest

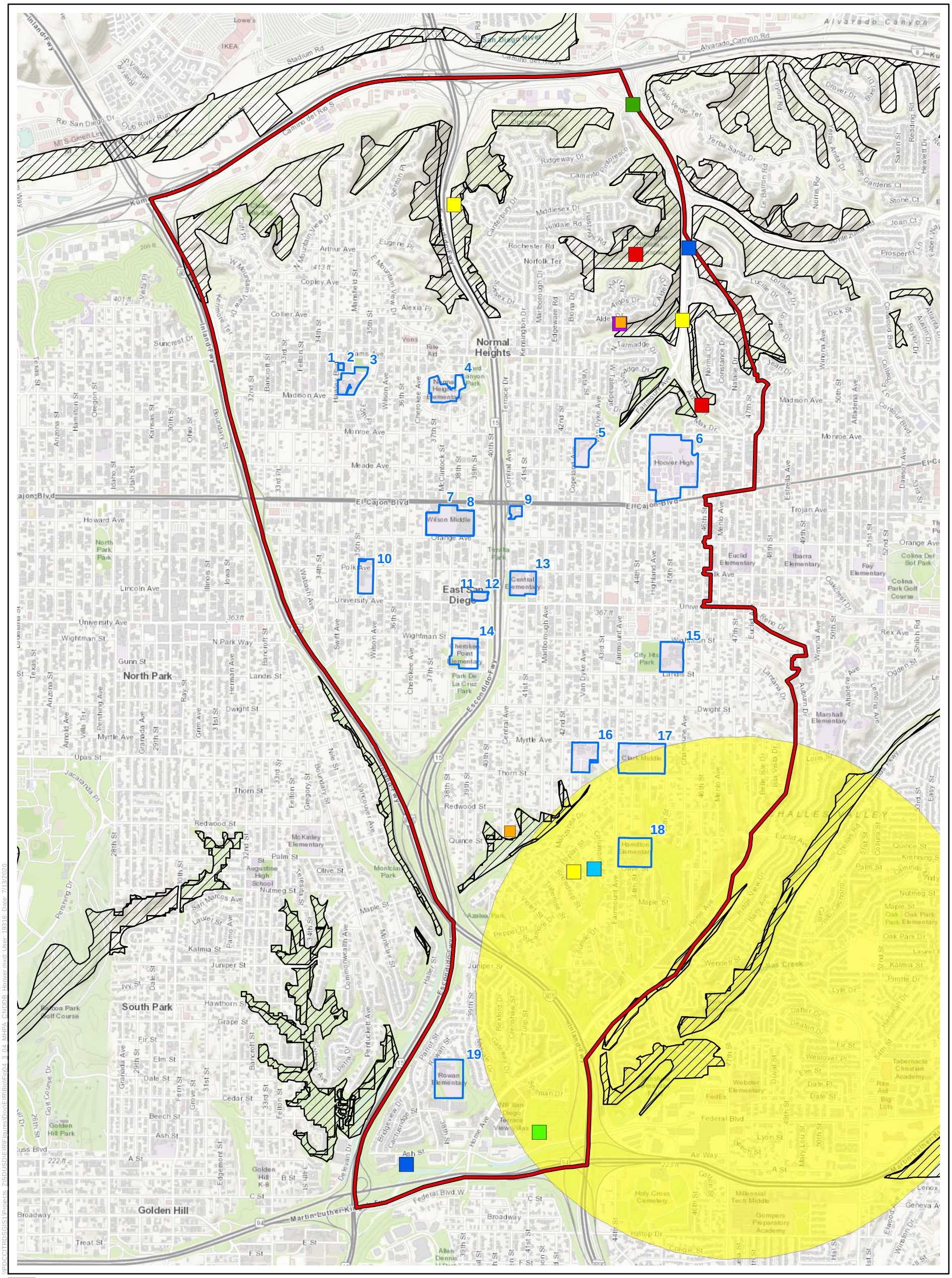
Coastal California Gnatcatcher
Least Bell's Vireo
Prairie Falcon
California Adolphia
Nuttall's Scrub Oak
Otay Mesa Mint
Robinson's Pepper-grass
San Diego Barrel Cactus
Dicots, San Diego marsh-elder
San Diego Mesa Mint
San Diego Thorn-mint
Dicots, long-spined spineflower
Dicots, purple stemodia
Dicots, singlewhorl burrobrush
Dicots, variegated dudleya
Wart-stemmed Ceanothus
Western Mastiff Bat
Orcutt's Brodiaea
San Diego Goldenstar
Reptiles, California glossy snake
Reptiles, coast horned lizard
Reptiles, orange-throated whiptail

Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

N

**Figure 4.3-3**
**Multiple Habitat Planning Areas & CNDDB - Henry Cluster Area**




Cluster Boundaries
School Boundary

Schools

1 - San Diego Global Vision Academy Middle
2 - San Diego Global Vision Academy
3 - Adams Elementary
4 - Normal Heights Elementary
5 - Franklin Elementary
6 - Hoover High
7 - Wilson Middle
8 - Arroyo Paseo Charter High
9 - America's Finest Charter
10 - Edison Elementary
11 - Health Sciences High
12 - Health Sciences Middle
13 - Central Elementary
14 - Cherokee Point Elementary
15 - Rosa Parks Elementary
16 - Joyner Elementary
17 - Clark Middle
18 - Hamilton Elementary
19 - Rowan Elementary

Multiple Habitat Planning Areas

CNDDB

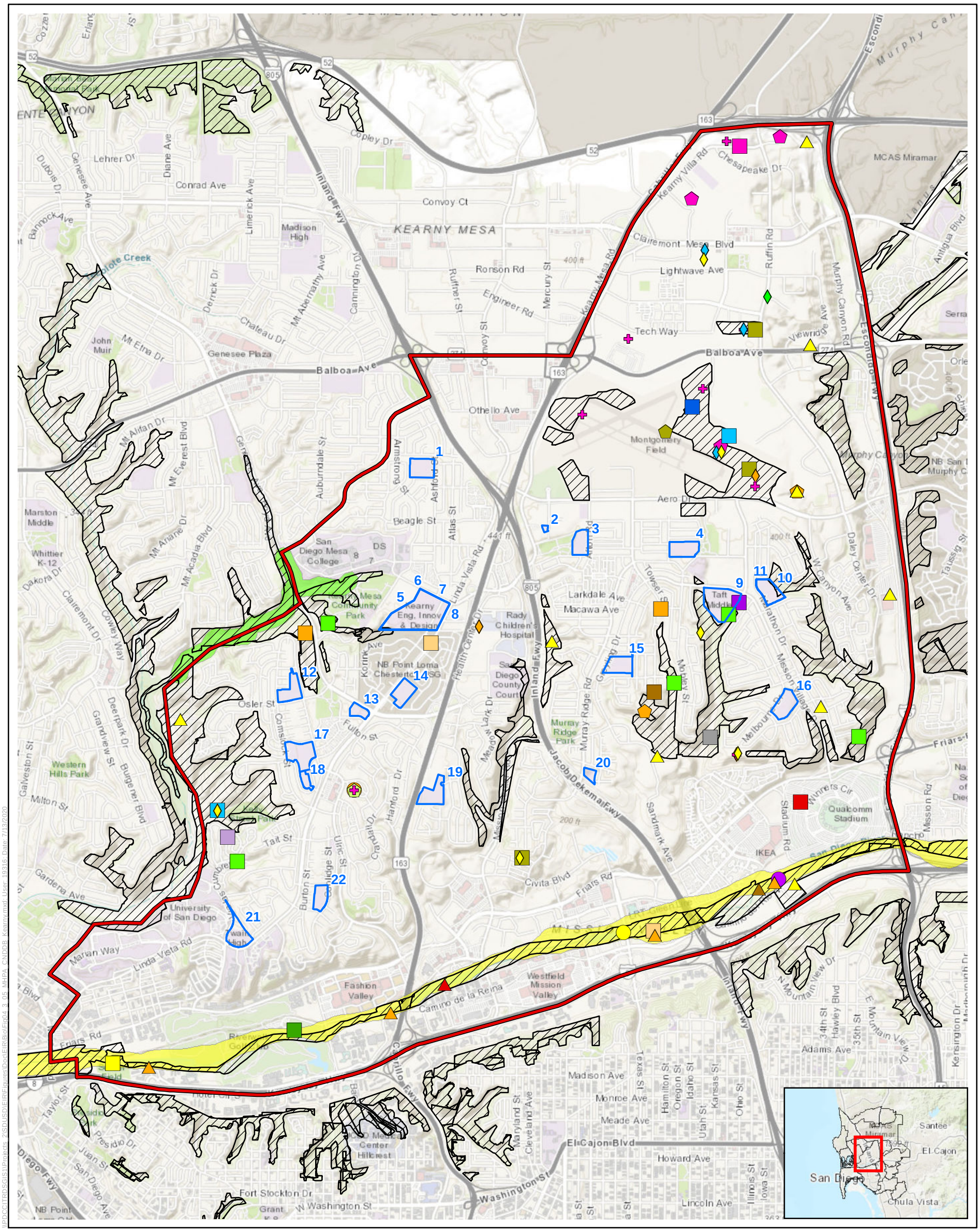
Maritime Succulent Scrub
California Adolphia
Nuttall's Scrub Oak
Dicots, Palmer's goldenbush
San Diego Barrel Cactus
San Diego Thorn-mint
Dicots, snake cholla
Dicots, summer holly
Wart-stemmed Ceanothus

Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

N

**Figure 4.3-4**
**Multiple Habitat Planning Areas & CNDDB - Hoover Cluster Area**




Cluster Boundaries
School Boundary

Schools
1 - Ross Elementary
2 - Coleman Tech Charter High
3 - Angier Elementary
4 - Wegeforth Elementary
5 - Kearny Construction Tech
6 - Kearny International Business
7 - Kearny SCT
8 - Kearny Digital Media & Design
9 - Taft Middle
10 - Cubberley Elementary
11 - Kavod Elementary Charter
12 - Linda Vista Elementary
13 - San Diego Cooperative Charter
14 - Chesterton Elementary
15 - Jones Elementary
16 - Juarez Elementary
17 - Montgomery Middle
18 - Empower Charter
19 - Fletcher Elementary
20 - Elevate Elementary
21 - Twain High
22 - Carson Elementary

Multiple Habitat Planning Areas

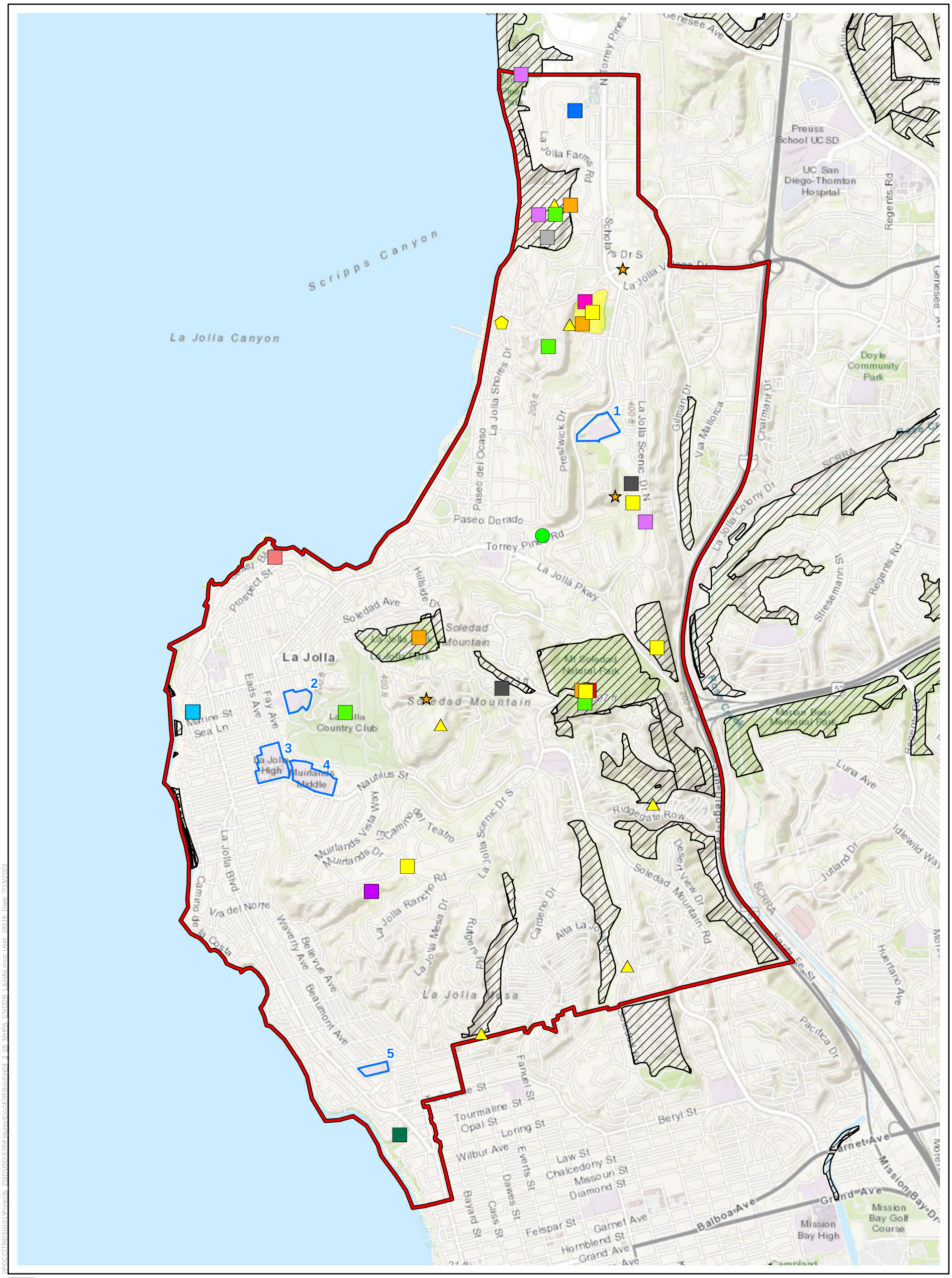
CNDDB
Southern Riparian Scrub
Southern Cottonwood Willow Riparian Forest
Western Spadefoot
Cooper's Hawk
Burrowing Owl
Coastal California Gnatcatcher
Least Bell's Vireo
Tricolored Blackbird
San Diego Fairy Shrimp
Coulter's Saltbush
Munz's Sage
Nuttall's Scrub Oak
Palmer's Grapplinghook
San Diego Ambrosia
San Diego Barrel Cactus
San Diego Button-celery
San Diego Mesa Mint
Beach Goldenaster
Decumbent Goldenbush
Estuary Seablite
Long-spined Spineflower
Singlewhorl Burrobrush
Spreading Navarretia
San Diego Mesa Hardpan Vernal Pool
Woven-spored Lichen
Yuma Myotis
Pocketed Free-tailed Bat
Western Mastiff Bat
Orcutt's Brodiaea
San Diego Goldenstar
California Glossy Snake
Orange-throated Whiptail
Southern California Legless Lizard

Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

N

**Figure 4.3-5**
**Multiple Habitat Planning Areas & CNDDB - Kearny Cluster Area**




Cluster Boundaries
School Boundary
Schools
1 - Torrey Pines Elementary
2 - La Jolla Elementary
3 - La Jolla High
4 - Muirlands Middle
5 - Bird Rock Elementary
Multiple Habitat Planning Areas
CNDDB
Southern Maritime Chaparral

Coastal California Gnatcatcher
Southern California Rufous-crowned Sparrow
Blochman's Dudleya
California Adolphia
Coulter's Saltbush
Nuttall's Scrub Oak
Robinson's Pepper-grass
San Diego Barrel Cactus
Aphanisma

Beach Goldenaster
Decumbent Goldenbush
Golden-spined Cereus
Sea Dahlia
Short-leaved Dudleya
South Coast Saltscale
Summer Holly
Variegated Dudleya
Wart-stemmed Ceanothus

Monarch - California Overwintering Population
Obscure Bumble Bee
American Badger
Mesa Shoulderband
Orcutt's Brodiaea
CaliforniaGlossy Snake
Coast Horned Lizard
Orange-throated Whiptail
Southern California Legless Lizard




Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

N

**Figure 4.3-6**
**Multiple Habitat Planning Areas & CNDDB - La Jolla Cluster Area**

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Cluster Boundaries
School Boundary

Schools
1 - Holly Drive Leadership Academy
2 - Webster Elementary
3 - Johnson Elementary
4 - Gompers Preparatory Academy
5 - Millennial Tech Middle
6 - Chollas/Mead Elementary
7 - Horton Elementary
8 - Encanto Elementary
9 - Evangeline Roberts Institute of Learning
10 - Lincoln High
11 - Porter Elementary
12 - Valencia Park Elementary
13 - Epiphany Prep Charter
14 - Ingenuity Charter
15 - The O'Farrell Charter
16 - Baker Elementary
17 - Chavez Elementary
18 - Knox Middle
19 - Nye Elementary
20 - Balboa Elementary

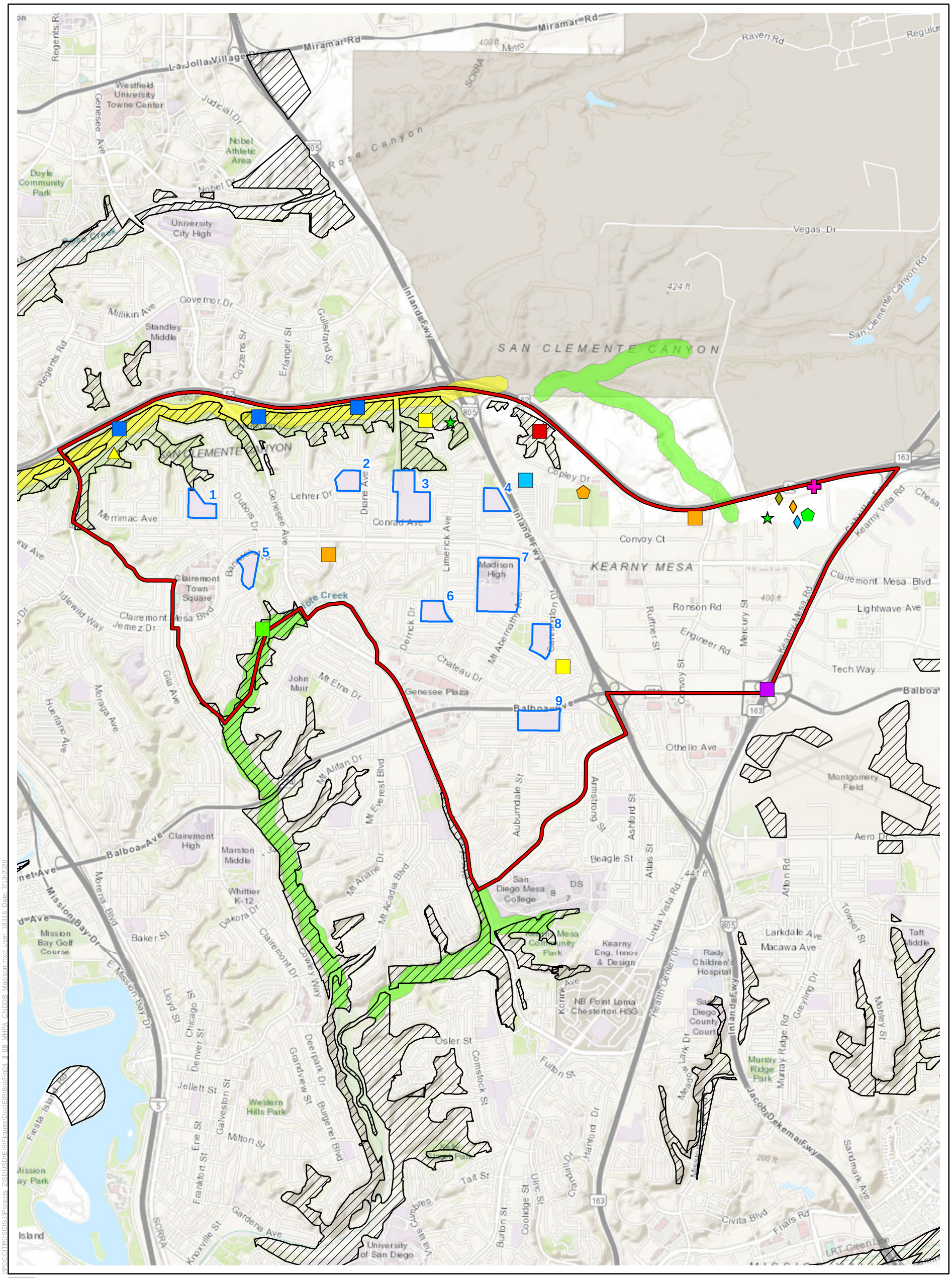
Multiple Habitat Planning Areas
CNDDB
Maritime Succulent Scrub
Southern Riparian Scrub
Coastal California Gnatcatcher
Coastal Cactus Wren
Least Bell's Vireo
Campbell's Liverwort
California Adolphia
Nuttall's Scrub Oak
Otay Tarplant
Palmer's Goldenbush
San Diego Barrel Cactus
Aphanisma
Decumbent Goldenbush
Snake Cholla
Wart-stemmed Ceanothus
Mexican Long-tongued Bat
Two-striped Gartersnake

Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

N

**Figure 4.3-7**
**Multiple Habitat Planning Areas & CNDDB - Lincoln Cluster Area**




Cluster Boundaries
School Boundary

Schools
1 - Whitman Elementary
2 - Hawthorne Elementary
3 - Creative, Performing, and Media Arts
4 - Innovation Middle
5 - Field Elementary
6 - Sequoia Elementary
7 - Madison High
8 - Lafayette Elementary
9 - Lindbergh/Schweitzer Elementary

Multiple Habitat Planning Areas

CNDDB
Southern Riparian Forest
Southern Riparian Scrub
Western Spadefoot
Coastal California Gnatcatcher
Campbell's Liverwort
San Diego Fairy Shrimp
Nuttall's Scrub Oak
Orcutt's Spineflower

San Diego Barrel Cactus
San Diego Mesa Mint
Summer Holly
Wart-stemmed Ceanothus
Willowy Monardella
Orcutt's Brodiaea
San Diego Goldenstar
Coast Horned Lizard
Orange-throated Whiptail

Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

N

**Figure 4.3-8**
**Multiple Habitat Planning Areas & CNDDB - Madison Cluster Area**

Cluster Boundaries
School Boundary
Schools
1 - Sandburg Elementary
2 - Ericson Elementary
3 - Hage Elementary
4 - Challenger Middle
5 - Hickman Elementary
6 - Mira Mesa High
7 - Walker Elementary
8 - TRACE
9 - Wangenheim Middle
10 - Jonas Salk Elementary
11 - Mason Elementary

Multiple Habitat Planning Areas
CNDDB
Southern Riparian Forest
Western Spadefoot
Coastal California Gnatcatcher
Least Bell's Vireo
Southern California Rufous-crowned Sparrow
White-tailed Kite
Campbell's Liverwort
San Diego Fairy Shrimp
California Adolphia

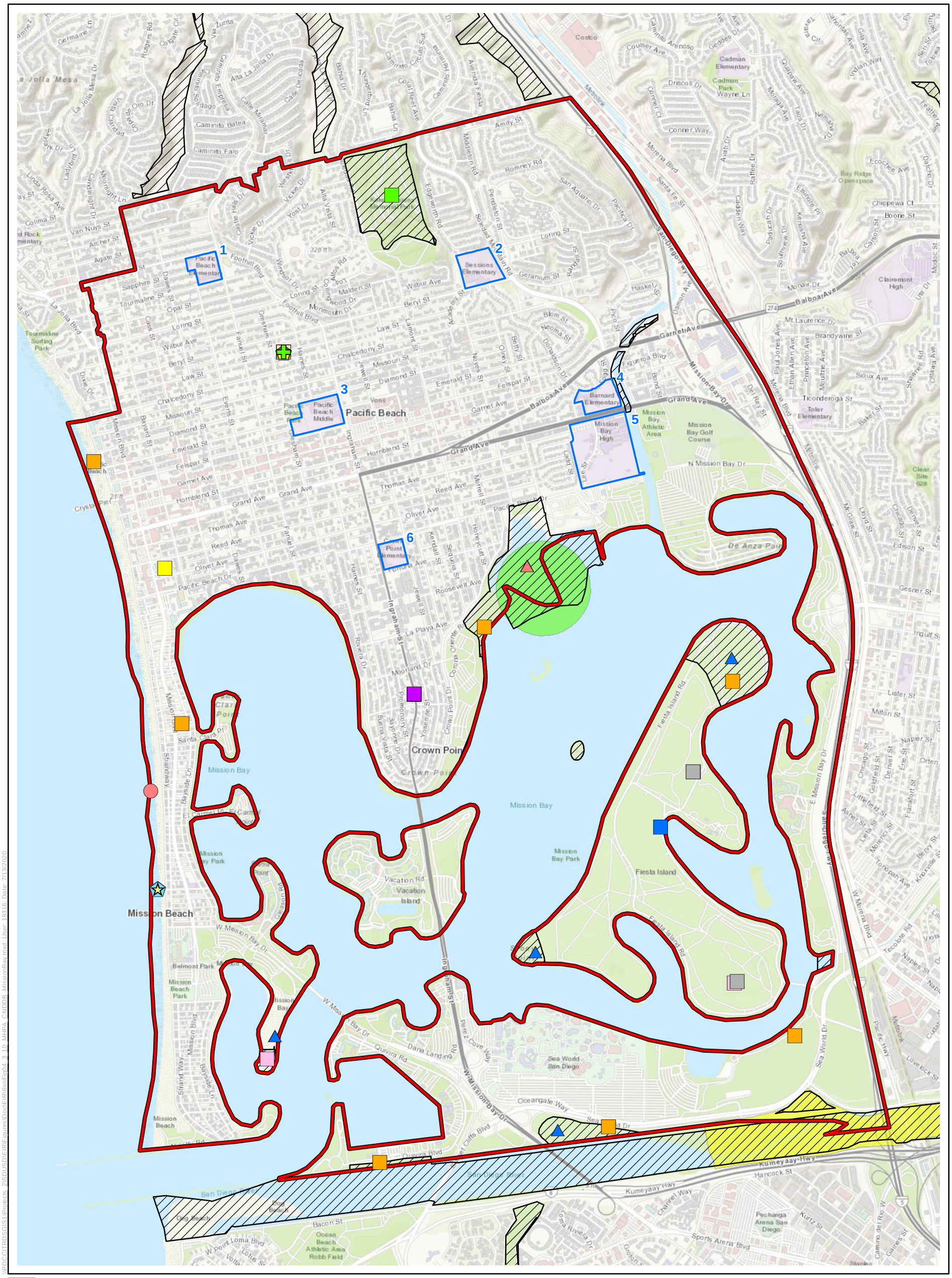
Del Mar Mesa Sand Aster
Del Mar Manzanita
Encinitas Baccharis
Nuttall's Scrub Oak
Palmer's Grapplinghook
Robinson's Pepper-grass
San Diego Barrel Cactus
San Diego Button-celery
San Diego Marsh-elder
San Diego Mesa Mint
San Diego Sagewort
San Diego Thorn-mint
Long-spined Spineflower
Sessile-leaved Yerba Santa
Summer Holly
Willowy Monardella
San Diego Mesa Hardpan Vernal Pool
San Diego Black-tailed Jackrabbit
San Diego Desert Woodrat
Orcutt's Brodiaea
San Diego Goldenstar

Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

N

**Figure 4.3-9**
**Multiple Habitat Planning Areas & CNDDB - Mira Mesa Cluster Area**




Cluster Boundaries
School Boundary
Schools
1 - Pacific Beach Elementary
2 - Sessions Elementary
3 - Pacific Beach Middle
4 - Barnard Elementary
5 - Mission Bay High
6 - Crown Point Elementary

Multiple Habitat Planning Areas
CNDDB
Southern Cottonwood Willow Riparian Forest
Southern Coastal Salt Marsh
Belding's Savannah Sparrow
California Least Tern
Light-footed Ridgway's Rail
Brand's Star Phacelia
Coulter's Goldfields

Nuttall's Acmispon
Orcutt's Pincushion
Robinson's Pepper-grass
San Diego Barrel Cactus
San Diego Sand Aster
Aphanisma
Beach Goldenaster
Chaparral Ragwort
Coast Woolly-heads

Decumbent Goldenbush
Sea Dahlia
Sandy Beach Tiger Beetle
Western Beach Tiger Beetle
Big Free-tailed Bat
Mesa Shoulderband
California Glossy Snake
Orange-throated Whiptail
Southern California Legless Lizard

Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

**Figure 4.3-10**
**Multiple Habitat Planning Areas & CNDDB - Mission Bay Cluster Area**

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Cluster Boundaries
School Boundary

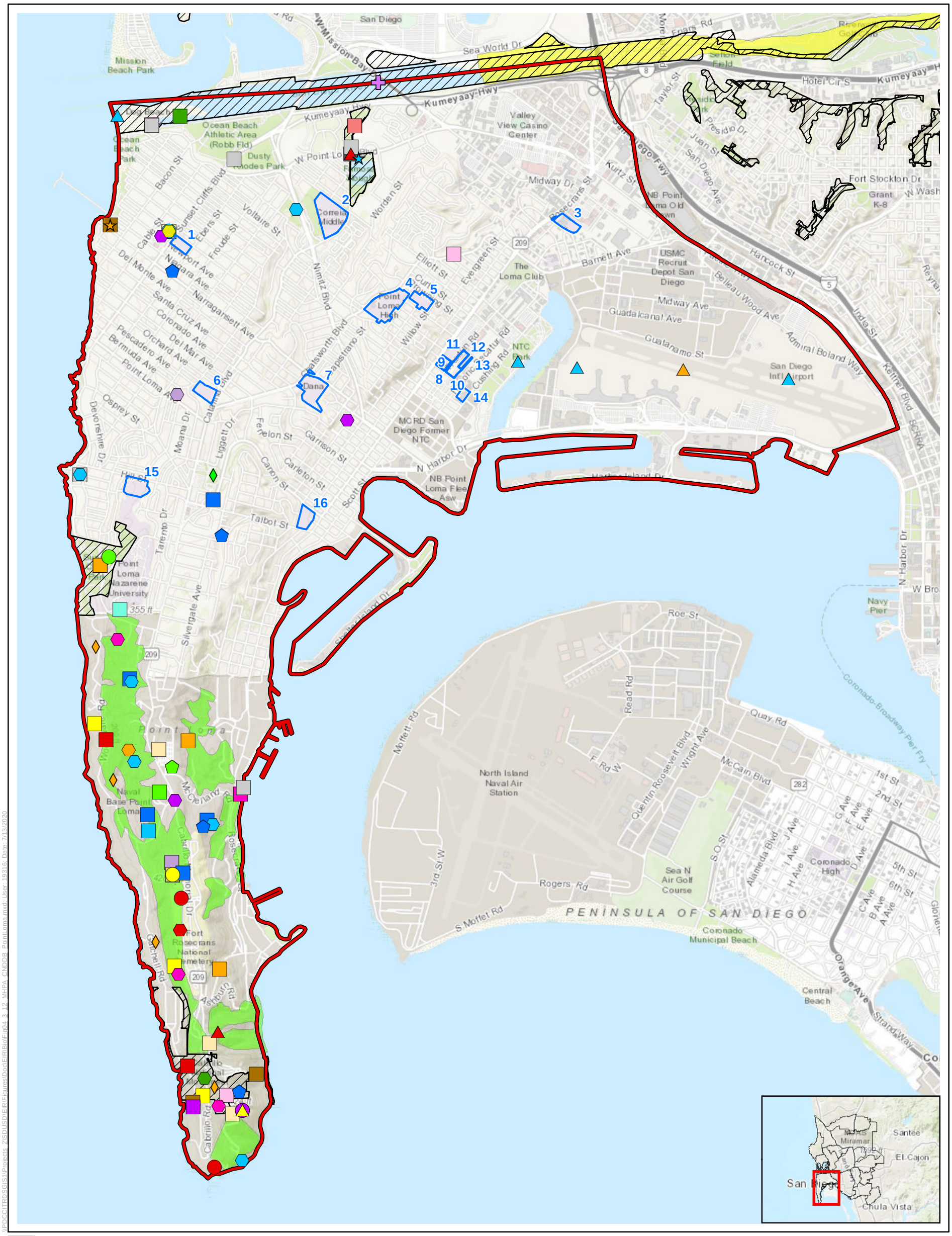
Schools
1 - Keiller Leadership Academy
2 - Audubon K-8
3 - Freese Elementary
4 - Morse High
5 - Fulton K-8
6 - Boone Elementary
7 - Bethune K-8
8 - Bell Middle
9 - Perry Elementary
10 - Paradise Hills Elementary
11 - San Diego SCPA
12 - Penn Elementary
13 - Zamorano Elementary
14 - Pacific View Leadership Elementary
Multiple Habitat Planning Areas

CNDDB
Maritime Succulent Scrub
Western Spadefoot
Coastal California Gnatcatcher
California Adolphia
Otay Tarplant
San Diego Ambrosia
San Diego Barrel Cactus
Variegated Dudleya
Western Beach Tiger Beetle
Western Tidal-flat Tiger Beetle
Orange-throated Whiptail

Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

**Figure 4.3-11**
**Multiple Habitat Planning Areas & CNDDB - Morse Cluster Area**




Cluster Boundaries
School Boundary
Schools
1 - Alcott Elementary
2 - Correia Middle
3 - John Muir
4 - Mt. Everest Academy
5 - Clairemont High
6 - Marston Middle
7 - Holmes Elementary
8 - Riley/New Dawn
9 - Whittier K-12
10 - Toler Elementary
11 - Bay Park Elementary
12 - Longfellow K-8

Multiple Habitat Planning Areas
CNDDB
Maritime Succulent Scrub
Southern Cottonwood Willow Riparian Forest
Western Spadefoot
California Black Rail
California Least Tern
Coastal California Gnatcatcher
Western Snowy Plover
California Adolphia
Coulter's Saltbush
Nuttall's Acmispon
Nuttall's Scrub Oak

Orcutt's Pincushion
Orcutt's Spineflower
Robinson's Pepper-grass
San Diego Barrel Cactus
San Diego Marsh-elder
San Diego Sand Aster
Aphanisma
Beach Goldenaster
Cliff Spurge
Coast Woolly-heads
Decumbent Goldenbush
Estuary Seablite

Golden-spined Cereus
Long-spined Spineflower
Salt Marsh Bird's-beak
Sand-loving Wallflower
Sea Dahlia
Short-lobed Broomrape
Slender Cottonheads
Snake Cholla
South Coast Saltscale
Sticky Dudleya
Wart-stemmed Ceanothus
Sandy Beach Tiger Beetle
Wandering (=saltmarsh) Skipper

San Diego Desert Woodrat
Big Free-tailed Bat
Northwestern San Diego Pocket Mouse
Silver-haired Bat
Western Mastiff Bat
Western Red Bat
Mimic Tryonia (=California Brackishwater Snail)
Shaw's Agave
California Glossy Snake
Coast Horned Lizard
Southern California Legless Lizard

Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

N

**Figure 4.3-12**
**Multiple Habitat Planning Areas & CNDDB - Point Loma Cluster Area**

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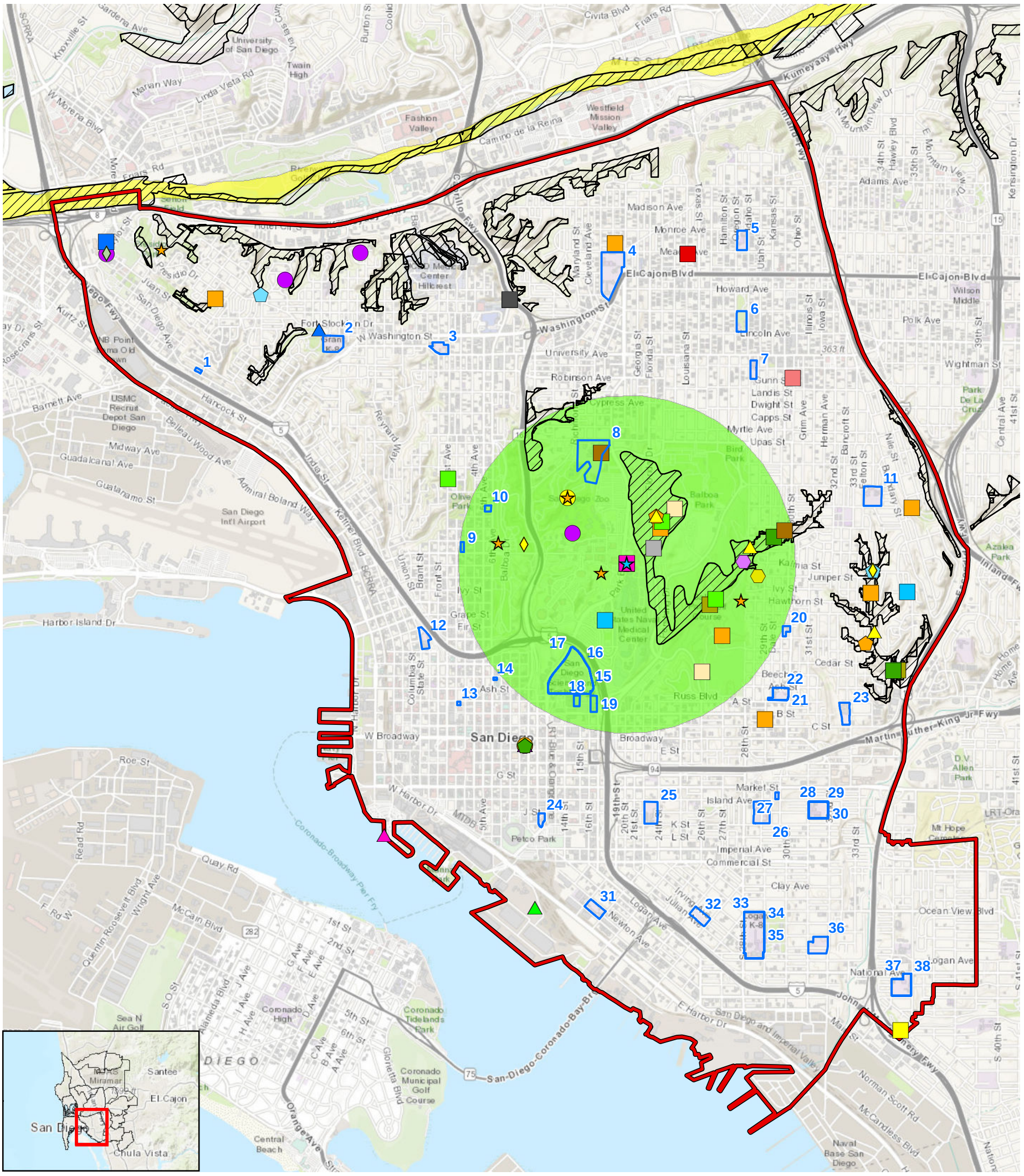
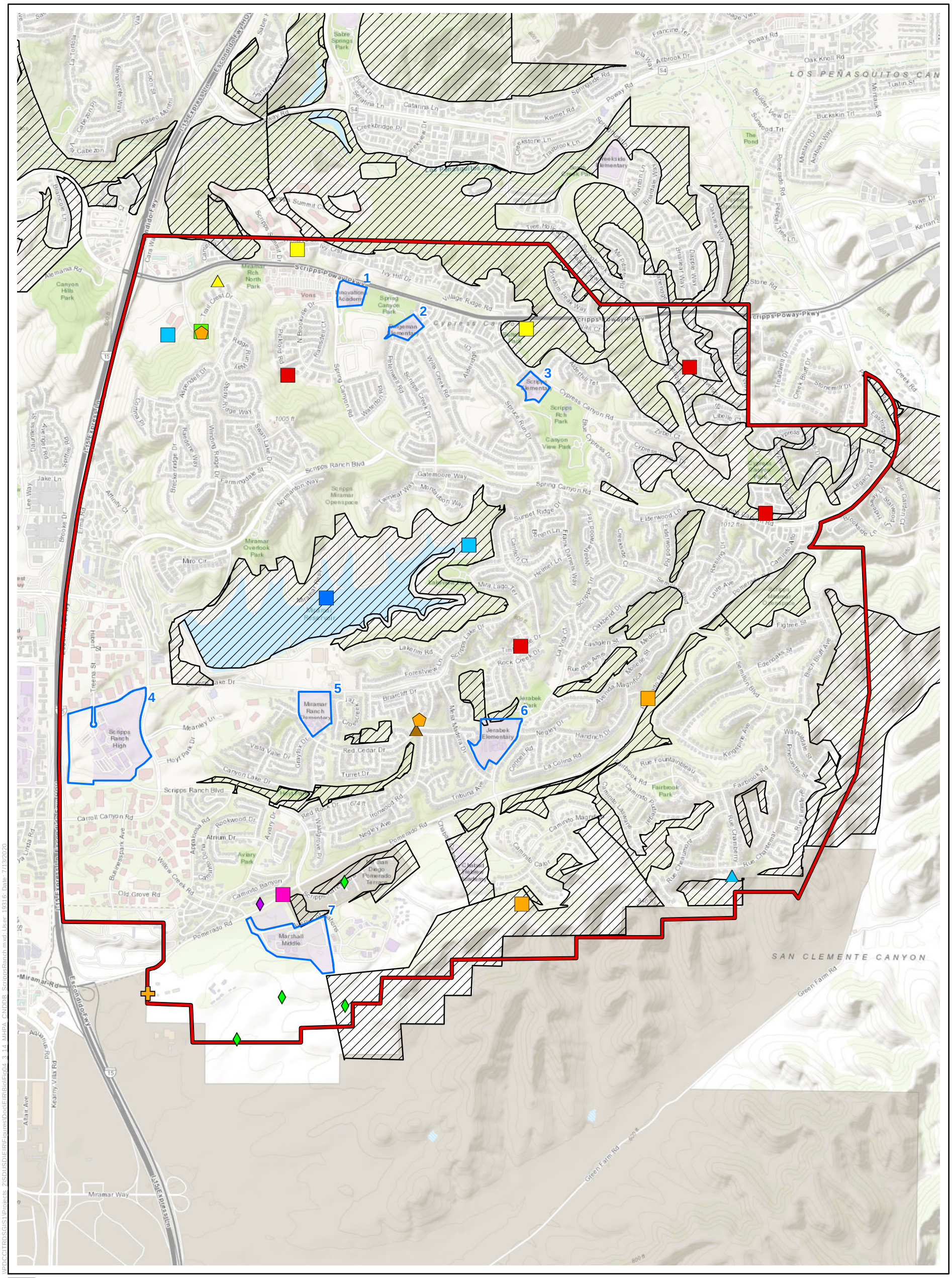
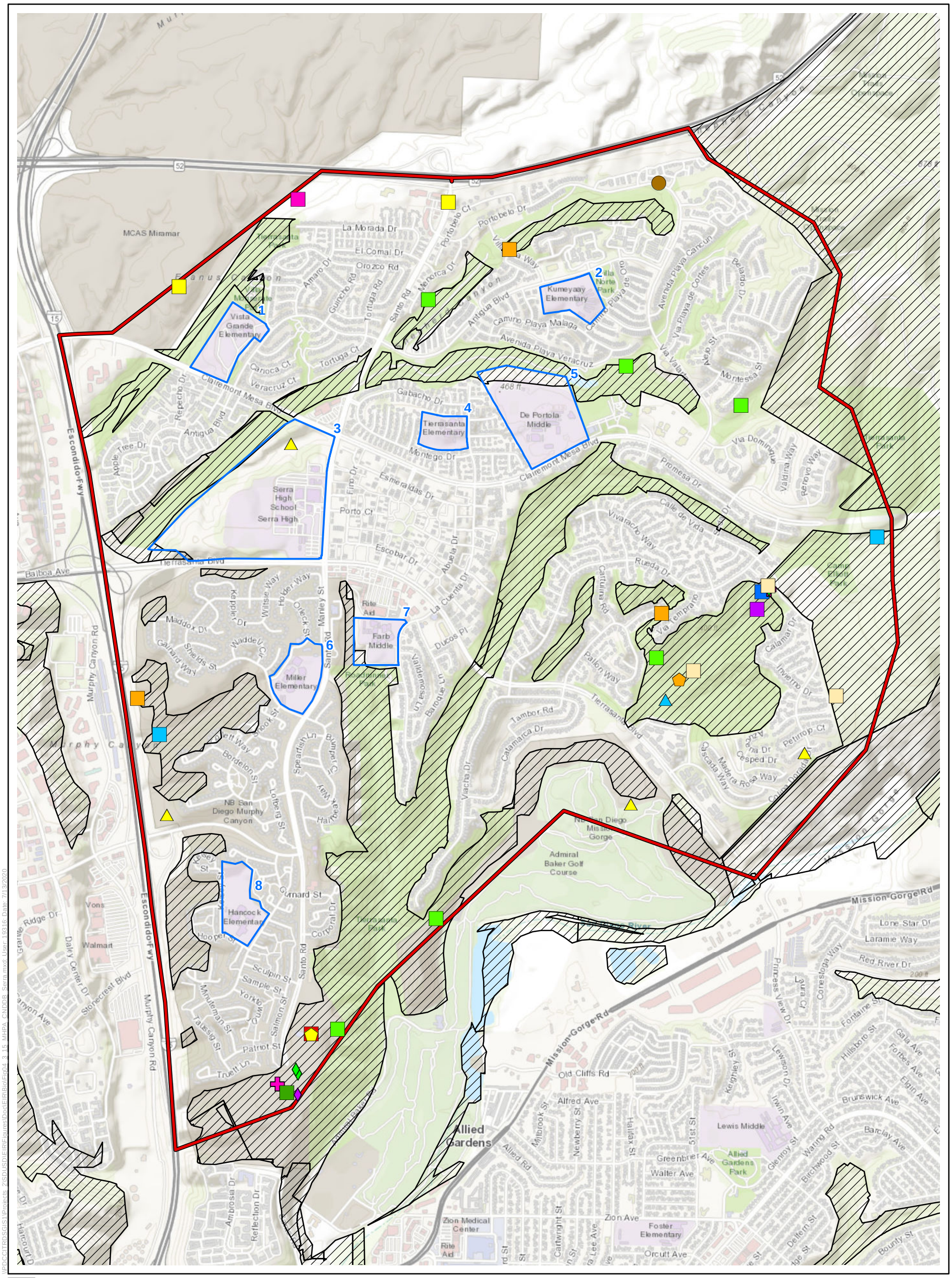



**Figure 4.3-13**
**Multiple Habitat Planning Areas & CNDDB - San Diego Cluster Area**




Source: Ninyo & Moore (2019)

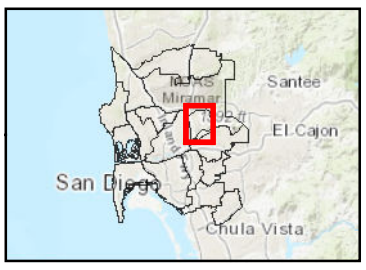
**Figure 4.3-14**
**Multiple Habitat Planning Areas &**
**CNDDB - Scripps Ranch Cluster Area**




- Cluster Boundaries
- School Boundary
- Multiple Habitat Planning Areas

Schools
1 - Vista Grande Elementary
2 - Kumeyaay Elementary
3 - Serra High
4 - Tierrasanta Elementary
5 - De Portola Middle
6 - Miller Elementary
7 - Farb Middle
8 - Hancock Elementary

CNDDB
- Western Spadefoot
- Coastal California Gnatcatcher
- Southern California Rufous-crowned Sparrow
- San Diego Fairy Shrimp
- Nuttall's Scrub Oak
- Palmer's Grapplinghook
- Robinson's Pepper-grass
- San Diego Barrel Cactus
- San Diego Button-celery
- San Diego Mesa Mint
- San Diego Thorn-mint
- Little Mousetail
- Summer Holly
- Willowy Monardella
- San Diego Mesa Hardpan Vernal Pool
- Northwestern San Diego Pocket Mouse
- Orcutt's Brodiaea
- San Diego Goldenstar
- Orange-throated Whiptail




Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

**Figure 4.3-15**
**Multiple Habitat Planning Areas & CNDDB - Serra Cluster Area**

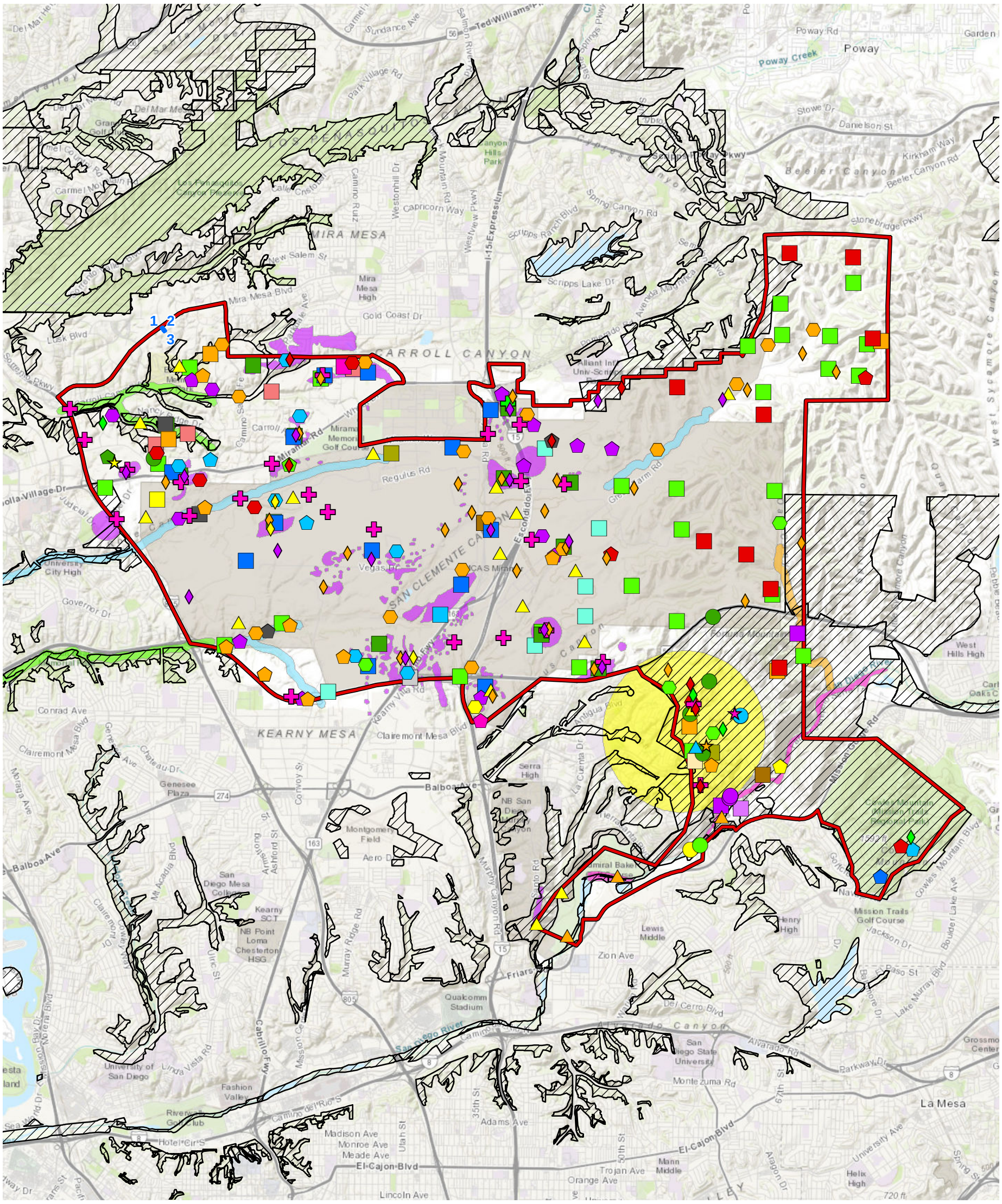



**Figure 4.3-16**
**Multiple Habitat Planning Areas & CNDDB - Unassigned Cluster Area**

Cluster Boundaries
School Boundary

Schools
1 - Preuss School UCSD
2 - Doyle Elementary
3 - University City High
4 - Curie Elementary
5 - Standley Middle
6 - Spreckels Elementary

Multiple Habitat Planning Areas

CNDDB
Torrey Pine Forest
Southern Maritime Chaparral
Southern Riparian Scrub
Southern Riparian Forest
Southern Coastal Salt Marsh
San Diego Mesa Hardpan Vernal Pool
Western Spadefoot
Belding's Savannah Sparrow
California Black Rail
California Least Tern
Coastal California Gnatcatcher
Least Bell's Vireo
Light-footed Ridgway's Rail
Western Snowy Plover
Campbell's Liverwort
San Diego Fairy Shrimp
Brand's Star Phacelia
California Adolphia
Del Mar Mesa Sand Aster
Del Mar Manzanita
Lakeside Ceanothus
Nuttall's Acmispon
Nuttall's Scrub Oak
Orcutt's Pincushion
Orcutt's Spineflower
Robinson's Pepper-grass
San Diego Barrel Cactus
San Diego Button-celery
San Diego Marsh-elder
San Diego Sagewort
San Diego Sand Aster
Aphanisma
Beach Goldenaster
Cliff Spurge
Coast Woolly-heads
Coastal Dunes Milk-vetch
Decumbent Goldenbush
Golden-spined Cereus
Long-spined Spineflower
Salt Spring Checkerbloom
Sand-loving Wallflower
Sea Dahlia
Short-leaved Dudleya
Short-lobed Broomrape
Snake Cholla
South Coast Saltscale
Spreading Navarretia
Sticky Dudleya
Summer Holly
Wart-stemmed Ceanothus
Torrey Pine
California Mellitid Bee
Globose Dune Beetle
Monarch - California Overwintering Population
Woven-spored Lichen
Spotted Bat
Mimic Tryonia (=California Brackishwater Snail)
Orcutt's Brodiaea
Shaw's Agave
Coronado Skink
Coast Horned Lizard
Coastal Whiptail
Orange-throated Whiptail
Southern California Legless Lizard

Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

N

**Figure 4.3-17**
**Multiple Habitat Planning Areas & CNDDB - University City Cluster Area**

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# 4.3.3 Applicable Laws and Regulations

## 4.3.3.1 Federal

### Federal Endangered Species Act

The Federal Endangered Species Act was enacted in 1973 to provide protection to threatened and endangered species and their associated ecosystems. "Take" of a listed species is prohibited except when authorization has been granted through a permit under Section 4(d), 7, or 10(a) of the act. *Take* is defined as to harass, harm, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any of these activities without a permit.

### Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) was enacted in 1918. Its purpose is to prohibit the killing or transport of covered native migratory birds—or any part, nest, or egg of any such bird—unless allowed by another regulation adopted in accordance with the MBTA. There is a list of species protected by this act that includes almost all native, non-game species.

### Clean Water Act

In 1948, Congress first passed the Federal Water Pollution Control Act. This act was amended in 1972 and became known as the Clean Water Act. The Clean Water Act regulates the discharge of pollutants into the waters of the U.S. Under Section 404, permits need to be obtained from the U.S. Army Corps of Engineers for discharge of dredge or fill material into waters of the U.S. Under Section 401 of the act, water quality certification from RWQCB needs to be obtained if there are to be any impacts on waters of the U.S.

## 4.3.3.2 State

### California Environmental Quality Act

CEQA requires that biological resources be considered when assessing the environmental impacts resulting from proposed actions. CEQA does not specifically define what constitutes an "adverse effect" on a biological resource. Instead, lead agencies are charged with determining what specifically should be considered an impact.

### California Fish and Game Code

The California Fish and Game Code (FGC) regulates the taking or possession of birds, mammals, fish, amphibians, and reptiles. It also provides additional protections for endangered species and regulations over lakes and streams and associated fish and wildlife habitat. Provisions regarding the protections for nesting birds are described in FGC Section 3503 and make it unlawful to take, possess, or needlessly destroy the nest or eggs of most wild birds.

### California Endangered Species Act

The California Endangered Species Act prohibits the take of any species that the California Fish and Game Commission determines to be a threatened or endangered species and is administered by CDFW. The act is found in FGC Sections 2050–2116. Incidental take of these listed species can be approved by CDFW. *Take* is defined as to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.

### Lake and Streambed Alteration Program

The Lake and Streambed Alteration Program is administered by CDFW and is found in Section 1600 et seq. of the FGC. CDFW regulates streams and waterways and associated fish and wildlife habitat. CDFW is to be notified if a project will affect lake or streambed resources.

### Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act is the California equivalent of the Clean Water Act. It provides for statewide coordination of water quality regulations through the establishment of the California State Water Resources Control Board and nine separate RWQCBs that oversee water quality on a day-to-day basis at the regional/local level.

### Natural Community Conservation Planning Act of 1991

The Natural Community Conservation Planning Act is designed to conserve natural communities at the ecosystem scale while accommodating compatible land use. CDFW is the principal state agency implementing the Natural Community Conservation Planning Program. NCCPs developed in accordance with this act provide for comprehensive management and conservation of multiple wildlife species and identify and provide for the regional or area-wide protection and perpetuation of natural wildlife diversity while allowing compatible and appropriate development and growth. The project is within the boundaries of the San Diego MSCP, which is an adopted NCCP, and the City of San Diego maintains an Implementing Agreement with CDFW.

### Native Plant Protection Act

The Native Plant Protection Act was enacted in 1977 and allows the California Fish and Game Commission to designate plants as “rare” or “endangered.” There are 64 species of plants designated and protected as “rare” under the act. Species designated as “endangered” are regulated under provisions of the California Endangered Species Act. The act prohibits take of endangered or rare native plants, but includes some exceptions for agricultural and nursery operations, emergencies, and—after properly notifying CDFW—certain vegetation removal. It is primarily codified in FGC Section 1900 et seq.

## 4.3.3.3 Local

### San Diego Unified School District Standard Design Guide, Educational Specifications, Guide Specifications, and Landscape Guide

Section G2050, *Landscaping*, of the District Standard Design Guide, establishes the goals and objectives related to implementation of landscaping at District facilities. Specifications in the design

guide stipulate leaving the native vegetation of canyon slopes adjacent to District facilities undisturbed. The plant selection guidelines also encourage the use of native and "climate similar" plants, trees, and groundcovers, whenever possible, and avoid the use of invasive plant species.

## Multiple Species Conservation Program

The MSCP is a comprehensive habitat conservation planning program for San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, thereby protecting biodiversity. Local jurisdictions, including the City of San Diego implement portions of the MSCP through subarea plans, which describe specific implementing mechanisms. In 1998, the City of San Diego finalized the City of San Diego MSCP Subarea Plan. The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

To implement its portion of the MSCP preserve, the City developed the MHPA, which is considered an urban preserve that delineates core biological resource areas and corridors targeted for conservation. MHPA lands are typically constrained by existing or approved development, and comprise linkages connecting several large areas of habitat.

## MHPA Land Use Adjacency Guidelines

To address the integrity of the MHPA and mitigate indirect impacts on the MHPA, guidelines were developed to manage land uses adjacent to the MHPA. These guidelines address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/land development.

### Drainage

All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales, or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.

### Toxics

Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, or that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly owned property as leases come up for renewal.

### Lighting

Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.

### Barriers

New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.

### Invasive Species

No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.

### Brush Management

New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zone 2 may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA. Brush management zones will not be greater in size than is currently required by the City's Municipal Code regulations. The amount of woody vegetation clearing shall not exceed 50% of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with City standards (i.e., to avoid the nesting season and preferentially remove non-natives over natives) and shall avoid/minimize impacts on covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowner's association or other private party.

### Noise

Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.

### Grading/Land Development

Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

## Environmentally Sensitive Lands Regulations

The City of San Diego's Municipal Code contains ESL regulations that require the overall protection of sensitive biological resources and ensure implementation of the MSCP. The purpose of the ESL Regulations is to "protect, preserve and, where damaged, restore the ESL of San Diego and the

viability of the species supported by those lands." The regulations require that development avoid impacts on certain sensitive biological resources as much as possible including, but not limited to, MHPA lands; wetlands and vernal pools in naturally occurring complexes; federal- and state-listed non-MSCP Covered Species; and MSCP Narrow Endemic species. Because the District is exempt from City of San Diego regulations for educational facilities, ESL regulations would not apply to existing District facilities. Generally, ESL regulations would only be applicable to new property acquisitions where the District would be constructing non-educational facilities (i.e., administrative facilities, etc.).

### Public Tree Protection Policy

The Public Tree Protection Policy was enacted in 2005 and provides special policies to protect designated tree resources located in public rights-of-way, on City-owned open space, in parks, or on other publicly owned lands, wherever practical. In addition, the policy applies to private land restricted by dedicated open space easements. Because the District is exempt from City of San Diego regulations for educational facilities, generally, the Public Tree Protection Policy would not apply to existing District facilities and would only be applicable to new property acquisitions where the District would be constructing non-educational facilities (i.e., administrative facilities, etc.).

# 4.3.4 Impact Analysis

## 4.3.4.1 Methodology

The following analysis considers the existing environmental setting and regulatory environment applicable to the District. Identification of the environmental setting and regulatory environment was based partly on a review of existing biological resources information available from the City of San Diego's MSCP Subarea Plan and Environmentally Sensitive Lands Ordinance, the City of San Diego's website, CDFW's CNDDB, and Google Earth. Implementation of the Proposed Program could adversely affect biological resources during future construction activities or result in a long-term effects on biological resources originating from the new and upgraded schools. The analysis focuses on issues related to sensitive wildlife species, plant species, vegetation communities, wildlife corridors, and HCPs. Potential direct and indirect impacts associated with the Proposed Program were evaluated and identified. Mitigation measures are provided, where applicable.

The Proposed Program consists of improvements identified in four project categories that represent typical capital improvement projects that could be implemented at any of the District's schools and administrative sites. Implementation of these project types could result in impacts related to biological resources.

## 4.3.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining significance of impacts associated with biological resources from the Proposed Program. The determination of whether a biological impact would be significant is based on the thresholds described below and the professional judgment of the District as lead agency and the recommendations of qualified personnel at ICF, all of which is based on evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following.

1. 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 CDFW or USFWS.
2. 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 CDFW or USFWS.
3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means.
4. 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.
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
6. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

# 4.3.4.3 Impacts and Mitigation Measures

***Threshold 1: Would the Proposed Program 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 CDFW or USFWS?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

New acquisition would be an administrative procedure and would not directly result in any physical changes to the environment. However, once the site has been acquired, the construction of a new school or administrative facility on that site would result in physical changes that could have significant environmental effects. At this time, no specific sites are proposed for acquisition, and the locations of any new school or administrative facilities are unknown. There is a potential that currently undeveloped sites could be acquired and developed with new school or administrative facilities. As discussed under Section 4.3.2, *Existing Conditions*, there are several sensitive species located within the boundaries of the District and City of San Diego. The construction activities associated with this project category could involve significant clearing and grubbing, grading and excavation, filling and compaction, and other ground disturbance activities, which could adversely affect candidate, sensitive, or special-status plant and wildlife species in local or regional plans, policies, or regulations, or by CDFW or USFWS (collectively referred to as sensitive species). The special-status species that could be affected would be dependent on the specific location and types

of vegetation communities occurring on the site. For example, areas within or adjacent to a District property may contain habitat for the coastal California gnatcatcher. In addition, trees could be removed that provide habitat for nesting birds protected under the MBTA. As such, because the location and site conditions of any new school or administrative site are currently unknown, there is a potential that construction activities could directly affect sensitive species present on a project site or through habitat modifications, including through permanent removal of suitable habitat for sensitive species. Therefore, the potential direct impacts on sensitive species associated with the construction of a New Acquisition and New School or Administrative Facilities Construction project would be a significant impact (**Impact-BIO-1**).

Additionally, projects could involve the use of heavy equipment that may emit excessive temporary noise, which could indirectly affect sensitive species, especially when work is occurring adjacent to MHPA land areas, which would result in a significant impact on biological resources (**Impact-BIO-2**). Construction activities occurring under the New Acquisition and New School or Administrative Facilities Construction project category could also result in similar indirect impacts on adjacent open space areas containing native vegetation (**Impact-BIO-3**).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project would require removal or disturbance of riparian or sensitive vegetation communities, **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-1**, **Impact-BIO-2**, and **Impact-BIO-3** to less-than-significant levels.

***Operation***

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots. No additional habitat would be removed during the operational phase. However, new school construction may install new substantial sources of nighttime lighting (e.g., athletic field lights) or create new permanent noise sources (e.g., new athletic events, public announcement systems) adjacent to existing MHPA land areas and/or open space areas containing native vegetation. Therefore, the operations of new acquisitions and new school or administrative facilities could result in indirect operational impacts on sensitive species (**Impact-BIO-4** and **Impact-BIO-5**).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project would require removal or disturbance of riparian or sensitive vegetation communities, **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of

these mitigation measures would reduce **Impact-BIO-4** and **Impact-BIO-5** to less-than-significant levels.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-BIO-1: Potential to Have a Direct Substantial Adverse Effect on Any Sensitive Species During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could directly impact sensitive species by permanently removing suitable habitat on site. This is a potentially significant impact.

**Impact-BIO-2: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.

**Impact-BIO-3: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could cause sediments and other construction materials to drain into adjacent native vegetation. In addition, noise from construction equipment could indirectly affect sensitive species within areas containing native vegetation. This is a potentially significant impact.

#### *Operation*

**Impact-BIO-4: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Operation of New School or Administrative Facilities.** If a new school or administrative facility construction project installs new nighttime lighting (e.g., athletics field lights, security lights) or creates new temporary or permanent noise sources (e.g., construction equipment, new athletics events, public announcement system) adjacent to existing Multi-Habitat Planning Area land areas, new school or administrative facility construction could result in indirect operational impacts on sensitive species. This is a potentially significant impact.

**Impact-BIO-5: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Operation of New School or Administrative Facilities.** If a new school or administrative facility construction project installs new nighttime lighting (e.g., athletics field lights, security lights) or creates new temporary or permanent noise sources (e.g., new athletics events, public announcement system) adjacent to undisturbed native vegetation, new school or administrative facility construction projects could result in indirect operational impacts on sensitive species. This is a potentially significant impact.

### Mitigation Measures

For **Impact-BIO-1**:

> **MM-BIO-1**: **Prepare a Desktop Analysis.** During the project-specific design stage, the District shall retain a qualified biologist to perform a desktop analysis to determine the potential for

site-specific biological resource impacts. The review shall include a 1-mile radius around the project site. As necessary, field visits will supplement desktop analysis.

If any project requires the removal of any trees or vegetation, in compliance with Migratory Bird Treaty Act, if a project requires the removal of any trees or vegetation, to the maximum extent possible, Proposed Program activity construction shall avoid the general avian breeding season (January 15 through August 31) near habitat that may contain sensitive species. If a project proposes construction involving ground disturbance, tree removal, or vegetation trimming or clearing during the nesting season in the vicinity of habitat with potential to support nesting birds, the District shall retain a qualified biologist to perform a nesting bird survey within the construction site. The survey shall be performed within 72 hours prior to project activities. If active nests are identified during the survey, the qualified biologist shall establish appropriate measures to avoid impacts on active nests, which may include a buffer around designated nests or other avoidance measures. The biologist shall monitor the nest, and the avoidance measures shall be in place until it has been determined the young have fledged or the nest has been abandoned.

**MM-BIO-2: Prepare a Biological Resources Technical Report.** If the desktop analysis and field visits prepared under **MM-BIO-1** identify sensitive species on a project site that would be directly or indirectly impacted, the biologist shall complete a biological resources technical report documenting biological findings and recommend project-specific mitigation measures. If the biological resources technical report identifies the need for specific mitigation measures, prior to construction, the District shall provide compensatory mitigation as necessary for direct impacts on any riparian or sensitive vegetation communities to be affected by construction of a specific project. Mitigation can be performed on site or off site, and may include passive or active habitat restoration or the purchasing of mitigation credits. All compensatory mitigation shall comply with all applicable local, regional, state, and federal plans, policies, and procedures, including CEQA compliance. In addition, the following measures shall be implemented, as applicable:

1. **Erect Environmentally Sensitive Area Fencing.** If sensitive species are identified as being present within the project site, prior to construction, a qualified biologist retained by the District shall delineate any areas identified as containing sensitive biological resources and install temporary environmentally sensitive area (ESA) fencing. Construction personnel shall avoid entering any area containing ESA fencing, and the ESA fencing shall remain in place until the conclusion of construction.
2. **Limit Light Pollution**. If Proposed Program activities are proposed on a site in the vicinity of sensitive biological resources, the District shall protect the biological resources from light pollution though the use of light barriers, redirecting light sources, and the use of downward facing and low-level illumination as appropriate.
3. **Limit Noise Pollution**. To further reduce indirect noise impacts, projects in proximity to sensitive biological resources shall construct berms or walls adjacent to recreational areas and other areas that may introduce noises that could interfere with nearby wildlife.
4. **Conduct Gnatcatcher Surveys and Monitoring.** If potential nesting habitat for the coastal California gnatcatcher is identified on or adjacent to a project site, construction noise that exceeds the maximum allowable levels shall be avoided during the breeding season for the coastal California gnatcatcher (February 15–August 31). If construction is proposed during

the breeding season for the species, U.S. Fish and Wildlife Service protocol surveys shall be required in order to determine species presence/absence. If protocol surveys are not conducted in suitable habitat during the breeding season for the aforementioned listed species, presence shall be assumed with implementation of noise attenuation and biological monitoring, as detailed below:

a. Prior to the commencement of the breeding season, a qualified biologist (possessing a valid Endangered Species Act Section 10(a)(1)(a) recovery permit) shall survey those habitat areas that would be subject to construction noise levels exceeding 60 A-weighted decibels (dBA) hourly average for the presence of the coastal California gnatcatcher. Surveys shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of any construction. If gnatcatchers are present, then the following conditions must be met:

    - Between February 15 and August 31, no clearing, grubbing, or grading of occupied gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist. Construction activities may result in noise levels exceeding 60 dBA hourly average at the edge of occupied gnatcatcher habitat. The qualified biologist, District staff, and a qualified noise specialist shall collaborate to determine suitable measures at the site. This can include, but not be limited to, the following: limitations on the placement of construction equipment and the simultaneous use of equipment, active monitoring of the gnatcatcher by the qualified biologist, or noise attenuation measures. If these implemented measures are determined to be inadequate by the qualified biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 31).

b. If coastal California gnatcatcher is not detected during the protocol survey, the qualified biologist shall submit substantial evidence to District staff that demonstrates whether mitigation measures (described above) are necessary between February 15 and August 31 as follows:

    - If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site conditions, then conditions shall be adhered to as specified above.

    - If this evidence concludes that no impacts on this species are anticipated, no mitigation measures will be necessary.

5. **Consult With Resource Agencies.** Prior to construction and dependent on results of the project-specific biological resources technical report, if protected wetlands are identified on a project, the District shall consult with the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Wildlife to determine project impacts on protected wetlands and obtain permits, as necessary. Additional compensatory mitigation may be required, which would be identified by the resource agencies during the consultation process.

6. **Protect Vernal Pools During Construction.** If, during preparation of the project-specific biological resources technical report, it is determined that construction activities would occur within 250 feet of a vernal pool, the District shall, prior to the start of construction,

delineate the boundaries of vernal pool resources with clearly visible flagging or fencing. The flagging and/or fencing shall be maintained in place for the duration of construction. Flagged and fenced areas shall be avoided during construction activities in that area. A qualified biological monitor shall be present during all ground-disturbing and vegetation removal activities within 250 feet of vernal pools. Immediately prior to initial ground-disturbing activities and/or vegetation removal, the qualified biological monitor shall survey the site to ensure that fencing is installed and that construction crews are aware that vernal pool resources cannot be affected.

7. **Replace Vernal Pool Habitat.** If direct or indirect impacts on vernal pools cannot be avoided during construction, the District shall mitigate impacts on vernal pools through either purchasing from a vernal pool mitigation bank for preservation or creating additional vernal pool habitat. Direct impacts shall be mitigated at a 2:1 ratio. Indirect impacts shall be mitigated at 1:1 ration.

For **Impact-BIO-2:**

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

**MM-BIO-3: Comply With the City's Multi-Habitat Planning Area Adjacency Guidelines.** Prior to the commencement of construction, the District shall verify the contractor has accurately represented the project's design in construction documents and/or contract specifications are in conformance with the City's Multi-Habitat Planning Area Adjacency Guidelines, specifically addressing the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/land development.

For **Impact-BIO-3**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

For **Impact-BIO-4**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

For **Impact-BIO-5**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

### Level of Significance After Mitigation

#### *Construction*

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring, which would protect sensitive species and would ensure impacts on these resources would be less than significant. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided.

Implementation of **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3** would reduce impacts of the Proposed Program in regard to substantial adverse effects, either directly or indirectly, on any sensitive

species. Therefore, with the implementation of **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3**, **Impact-BIO-1** through **Impact-BIO-3** would be reduced to less-than-significant levels.

***Operation***

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring, which would protect sensitive species and would ensure impacts on these resources would be less than significant. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided.

Implementation of **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3** would reduce impacts of the Proposed Program in regard to substantial adverse effects, either directly or indirectly, on any sensitive species. Therefore, with the implementation of **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3**, **Impact-BIO-4** and **Impact-BIO-5** would be reduced to less-than-significant levels.

## Whole Site Modernization

### Impact Discussion

***Construction***

Whole site modernization projects would potentially include demolition of existing facilities and construction of new or reconstruction of existing buildings. Whole site modernization may also include improvement of athletic facilities, reconfiguration of existing classrooms, installation/demolition of modular classrooms, and construction/reconfiguration of existing restrooms. Construction activities associated with whole site modernization projects would generally involve minor to major grading and ground disturbance, occur in phases over a period of multiple years, and require the use of heavy equipment.

Construction activities associated with this project category would not likely involve significant clearing and grubbing because existing school sites are all fully developed and primarily within developed urban communities. Additionally, only ornamental landscaping would be removed for projects occurring within existing school sites. However, activities could directly affect sensitive species present on a project site or through habitat modifications including removal of suitable habitat for sensitive species, through activities such as slope repair on undisturbed canyons adjacent to school sites within District-owned parcels or removal of ornamental vegetation that provides habitat for nesting birds protected under the MBTA. Therefore, the potential direct impacts on sensitive species associated with the construction of a whole site modernization project would be a significant impact (**Impact-BIO-6**).

As identified in Tables 4.3-2 and 4.3-3 there are several existing school sites adjacent to MHPA land areas or canyons and undisturbed vegetation. Construction of this project category could involve the use of heavy equipment that may emit excessive noise and light pollution, which could indirectly affect sensitive species adjacent to the boundaries of the site, especially when work is occurring adjacent to MHPA land, as identified in Table 4.3-2, or undisturbed native vegetation as identified in Table 4.3-3, which has the potential to result in indirect impacts on sensitive species (**Impact-BIO-7** or **Impact-BIO-8,** respectively).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project would require removal or disturbance of riparian or sensitive vegetation communities, **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-6**, **Impact-BIO-7**, and **Impact-BIO-8** to less-than-significant levels.

***Operation***

During operation of whole site modernization projects, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots. No additional habitat would be removed during the operational phase. However, while none of the new whole site modernization projects would introduce substantial new sources of nighttime lighting, some of these projects, which are adjacent to existing MHPA land areas and/or open space areas containing native vegetation, may create new permanent noise sources (e.g., new athletic events, public announcement systems)affecting biological resources. Therefore, the operations of whole site modernization projects could result in indirect operational impacts on sensitive species (**Impact-BIO-9** and **Impact-BIO-10**).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project would require removal or disturbance of riparian or sensitive vegetation communities, **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-9** and **Impact-BIO-10** to less-than-significant levels.

**Level of Significance Prior to Mitigation**

***Construction***

**Impact-BIO-6: Potential to Have a Direct Substantial Adverse Effect on Any Sensitive Species During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could directly impact sensitive species by permanently removing suitable habitat on site. This is a potentially significant impact.

**Impact-BIO-7: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Whole Site Modernization Projects.** For existing District properties indicated on Table 4.3-2, construction activities associated with whole site modernization projects could cause sediments and other construction materials to drain into Multi-

Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.

**Impact-BIO-8: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of Whole Site Modernization Projects.** For existing District properties indicated on Table 4.3-3, construction activities associated with whole site modernization projects could cause sediments and other construction materials to drain into adjacent native vegetation. In addition, noise from construction equipment could indirectly affect sensitive species within areas containing native vegetation. This is a potentially significant impact.

***Operation***

**Impact-BIO-9: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Operation of Whole Site Modernization Projects.** For an existing District properties indicated on Table 4.3-2, if a whole site modernization project creates new temporary or permanent noise sources (e.g., construction equipment, new athletics events, public announcement system) adjacent to existing Multi-Habitat Planning Area land areas, construction could result in indirect operational impacts on sensitive species. This is a potentially significant impact.

**Impact-BIO-10: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Operation of Whole Site Modernization Projects.** For an existing District properties indicated on Table 4.3-3, if a whole site modernization project creates new temporary or permanent noise sources (e.g., new athletics events, public announcement system) adjacent to undisturbed native vegetation, whole site modernization projects could result in indirect operational impacts on sensitive species. This is a potentially significant impact.

### Mitigation Measures

For **Impact-BIO-6**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

For **Impact-BIO-7**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3**, as described above.

For **Impact-BIO-8**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

For **Impact-BIO-9**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

For **Impact-BIO-10**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

### Level of Significance After Mitigation

#### *Construction*

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring, which would protect sensitive species and would ensure impacts on these resources would be less than significant. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided.

Implementation of **MM-BIO-1** through **MM-BIO-3** would reduce impacts of the Proposed Program in regard to substantial adverse effects, either directly or indirectly, on any sensitive species. Therefore, with the implementation of **MM-BIO-1** through **MM-BIO-3**, **Impact-BIO-4** through **Impact-BIO-6** would be reduced to less-than-significant levels.

#### *Operation*

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring, which would protect sensitive species and would ensure impacts on these resources would be less than significant. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided.

Implementation of **MM-BIO-1** through **MM-BIO-3** would reduce impacts of the Proposed Program in regard to substantial adverse effects, either directly or indirectly, on any sensitive species. Therefore, with the implementation of **MM-BIO-1** through **MM-BIO-3**, **Impact-BIO-9** and **Impact-BIO-10** would be reduced to less-than-significant levels.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Upgrades of existing school and administrative sites projects would potentially include minimal exterior improvements, maintenance, and/or replacement of aging infrastructure; construction of new or reconfiguration of existing driveways, loading areas, and parking lots; construction or reconfiguration of Americans with Disabilities Act facilities; and various other landscape, security facility, technological, equipment, seismic structural integrity, heating, ventilating, and air condition system, utility, signage, and energy efficiency upgrades. Construction activities associated with these projects would generally involve minimal to no ground disturbance over a short-term time frame and require the use of light equipment.

Construction activities associated with this project category would likely occur within developed land and would not affect sensitive species. Upgrades such as replacing or constructing new driveways and parking lots would occur within already developed areas of a District property and would not directly affect sensitive species. However, tree or vegetation removal where nesting birds

are located could occur under this project category or, and, as shown in Tables 4.3-2 and 4.3-3, there are existing school sites located adjacent to MHPA land areas and undeveloped vegetated areas containing sensitive species that could be indirectly impacted by the temporary increase of noise levels associated with construction equipment. Therefore, the potential indirect impacts on sensitive species associated with the construction of an Upgrades of Existing School and Administrative Site project would be a significant impact on MHPA lands (**Impact-BIO-11**) and native vegetation (**Impact-BIO-12**).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project would require removal or disturbance of riparian or sensitive vegetation communities, **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-11** and **Impact-BIO-12** to less-than-significant levels.

#### *Operation*

During operation of upgrades of existing school and administrative facilities, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots. No additional habitat would be removed during the operational phase. Therefore, the Upgrades of Existing School and Administrative Sites project category would have no substantial adverse effect, either directly or through habitat modifications, on any sensitive species. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-BIO-11: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities.** For existing District properties listed on Table 4.3-2, construction activities associated with upgrades of existing school and administrative sites or with joint-use facilities could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.

**Impact-BIO-12: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities.** For existing District properties listed on Table 4.3-3, construction activities associated with upgrades of existing school and administrative sites or with joint-use facilities could cause sediments and other construction materials to drain into adjacent native vegetation. In addition, noise from construction equipment could indirectly affect sensitive species within areas containing native vegetation. This is a potentially significant impact.

***Operation***

No operational activities during upgrades of existing sites would result in a substantial adverse effect, either directly or through habitat modifications, on any sensitive species. Impacts would be less than significant.

### Mitigation Measures

For **Impact-BIO-11**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

For **Impact-BIO-12**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

### Level of Significance After Mitigation

***Construction***

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring, which would protect sensitive species and would ensure impacts on these resources would be less than significant. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided.

Implementation of **MM-BIO-1**through **MM-BIO-3** would reduce impacts of the Proposed Program in regard to substantial adverse effects, either directly or indirectly, on any sensitive species. Therefore, with the implementation of **MM-BIO-1** through **MM-BIO-3**, **Impact-BIO-11** through **Impact-BIO-12** would be reduced to less-than-significant levels.

***Operation***

No operational activities during upgrades of existing sites would result in a substantial adverse effect, either directly or through habitat modifications, on any sensitive species. Impacts would be less than significant.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

***Construction***

Joint-use facilities development projects would potentially include construction of new recreational facilities, removal of decomposed granite fields, installation of artificial turf field or stabilized walking track, and construction of pools, parking, and other minor amenities for recreational spaces. Construction activities associated with these projects would generally involve moderate ground disturbance over a short-term time frame and require the use of heavy equipment.

Construction activities associated with this project category could involve new recreational facility construction on undeveloped land or may require the removal of onsite ornamental vegetation

within existing school sites, which could directly affect sensitive species. Therefore, the potential for direct impacts on sensitive species associated with the construction of a joint-use facilities development project would be a significant impact (**Impact-BIO-13**).

As identified in Tables 4.3-2 and 4.3-3, there are several existing school sites that are located adjacent to MHPA land areas or canyons and undisturbed native vegetation. As such, construction of this project category could involve the use of heavy equipment that may emit excessive noise, which could indirectly affect sensitive species adjacent to the boundaries of the site, especially when work is occurring adjacent to MHPA land. Therefore, the potential indirect impacts on sensitive species associated with the construction of a joint-use facilities would be a significant impact on MHPA lands and/or open space areas containing native vegetation (**Impact-BIO-11** and **Impact-BIO-12**, respectively, as identified above).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project would require removal or disturbance of riparian or sensitive vegetation communities, **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-11**, **Impact-BIO-12**, and **Impact-BIO-13** to less-than-significant levels.

***Operation***

During operation of joint-use facilities, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots. No additional habitat would be removed during the operational phase. However, joint-use facilities may create new permanent noise sources (e.g., new athletic events, public announcement systems) adjacent to existing MHPA land areas and/or open space areas containing native vegetation. Therefore, the operations of joint-use facility projects could result in indirect operational impacts on sensitive species (**Impact-BIO-14** and **Impact-BIO-15**).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project would require removal or disturbance of riparian or sensitive vegetation communities, **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-14** and **Impact-BIO-15** to less-than-significant levels.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-BIO-11: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities.** For existing District properties listed on Table 4.3-2, construction activities associated with upgrades of existing school and administrative sites or with joint-use facilities could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.

**Impact-BIO-12: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities.** For existing District properties listed on Table 4.3-3, construction activities associated with upgrades of existing school and administrative sites or with joint-use facilities could cause sediments and other construction materials to drain into adjacent native vegetation. In addition, noise from construction equipment could indirectly affect sensitive species within areas containing native vegetation. This is a potentially significant impact.

**Impact-BIO-13: Potential to Have a Direct Substantial Adverse Effect on Any Sensitive Species During Construction of Joint-Use Facilities.** Construction activities associated with joint-use facilities could directly impact sensitive species by permanently removing suitable habitat on site. This is a potentially significant impact.

#### *Operation*

**Impact-BIO-14: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Operation of Joint-Use Facility Projects.** For existing District properties indicated on Table 4.3-2, if a joint-use facility project creates new temporary or permanent noise sources (e.g., new athletics events, public announcement system) adjacent to existing Multi-Habitat Planning Area land areas, joint-use facilities could result in indirect operational impacts on sensitive species. This is a potentially significant impact.

**Impact-BIO-15: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Operation of Joint-Use Facility Projects.** For existing District properties indicated on Table 4.3-3, if a joint-use project creates new temporary or permanent noise sources (e.g., new athletics events, public announcement system) adjacent to undisturbed native vegetation, joint-use facilities could result in indirect operational impacts on sensitive species. This is a potentially significant impact.

### Mitigation Measures

For **Impact-BIO-11**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

For **Impact-BIO-12**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

For **Impact-BIO-13**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

For **Impact-BIO-14**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

For **Impact-BIO-15**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

#### Level of Significance After Mitigation

***Construction***

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring, which would protect sensitive species and would ensure impacts on these resources would be less than significant. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided.

Implementation of **MM-BIO-1** through **MM-BIO-3** would reduce impacts of the Proposed Program in regard to substantial adverse effects, either directly or indirectly, on any sensitive species. Therefore, with the implementation of **MM-BIO-1** through **MM-BIO-3**, **Impact-BIO-11** through **Impact-BIO-13** would be reduced to less-than-significant levels.

***Operation***

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring, which would protect sensitive species and would ensure impacts on these resources would be less than significant. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided.

Implementation of **MM-BIO-1** through **MM-BIO-3** would reduce impacts of the Proposed Program in regard to substantial adverse effects, either directly or indirectly, on any sensitive species. Therefore, with the implementation of **MM-BIO-1** through **MM-BIO-3**, **Impact-BIO-14** and **Impact-BIO-15** would be reduced to less-than-significant levels.

## Site-Specific Analysis

### Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.3-4. At this time, the specific details for each of these projects are unknown. However, the near-term, site-specific projects would involve a combination of the improvements identified under the Whole Site Modernization project category, as described further in Chapter 3, *Project Description*.

**Table 4.3-4. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019.

### Construction

As described further in Chapter 3, whole site modernization projects could include improved athletic facilities, such as new/replacement athletic fields, stadiums, public address systems, or field lighting, gymnasiums, and other improvements such as installation of artificial or natural turf fields to replace existing athletic facilities or the reconfiguration of existing athletic facilities. These improvements could be constructed at any of the 21 schools identified in Table 4.3-4, and could involve excavation and ground-disturbing activities for the installation of athletic fields, replacement field lighting, and other athletic facilities.

As discussed above, construction activities associated with whole site modernizations would not likely involve significant clearing and grubbing unless new facilities on existing schools were placed in previously undisturbed areas, which is unlikely because existing school sites are developed and primarily within developed urban communities. Additionally, ornamental landscaping could be removed.

As shown in Table 4.3-3, several of the near-term, site-specific whole site modernization project sites contain or are adjacent to native vegetation or open space, including the following:

- Boone Elementary

- Clairemont High
- Correia Middle
- Fulton K-8
- Lewis Middle
- Marshal Elementary
- Perry Elementary
- Rowan Elementary

In addition, as identified in Table 4.3-2 and Figure 4.3-7 (Lincoln Cluster), Valencia Park Elementary School is adjacent to MHPA land. Activities could directly affect sensitive species present on a project site or through habitat modifications such as the removal of suitable habitat for sensitive species, including ornamental vegetation. Therefore, the potential direct impacts on sensitive species associated with the construction of the near-term, site specific whole site modernization projects would be significant (**Impact-BIO-6**).

In addition, construction activities at Valencia Park Elementary or at the eight schools listed above could involve the use of heavy equipment that may emit excessive noise, which could indirectly affect sensitive species adjacent to the boundaries of the site, especially when work is occurring adjacent to MHPA land and/or in open space areas containing native vegetation. Therefore, the potential indirect impacts on sensitive species associated with the construction of near-term, site-specific whole site modernization projects would be significant on MHPA lands and/or open space areas containing native vegetation (**Impact-BIO-7** and **Impact-BIO-8**, respectively).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project would require removal or disturbance of riparian or sensitive vegetation communities, **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-6**, **Impact-BIO-7**, and **Impact-BIO-8** to less-than-significant levels.

### Operation

During operation of the near-term, site-specific whole site modernization projects, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots. No additional habitat would be removed during the operational phase. However, some of these near-term, site specific whole site modernization projects may install new nighttime lighting (e.g., athletic field lights, security lights) or create new permanent noise sources (e.g., new athletic events, public announcement systems) adjacent to existing MHPA land areas. Therefore, the operations of the near-term, site-specific whole site modernization projects could result in indirect operational impacts on sensitive species (**Impact-BIO-9** and **Impact-BIO-10**).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project would require removal or disturbance of riparian or sensitive vegetation communities, **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-9** and **Impact-BIO-10** to less-than-significant levels.

## Level of Significance Prior to Mitigation

### Construction

**Impact-BIO-6: Potential to Have a Direct Substantial Adverse Effect on Any Sensitive Species During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could directly impact sensitive species by permanently removing suitable habitat on site. This is a potentially significant impact.

**Impact-BIO-7: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Whole Site Modernization Projects.** For existing District properties indicated on Table 4.3-2, construction activities associated with whole site modernization projects could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.

**Impact-BIO-8: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of Whole Site Modernization Projects.** For existing District properties indicated on Table 4.3-3, construction activities associated with whole site modernization projects could cause sediments and other construction materials to drain into adjacent native vegetation. In addition, noise from construction equipment could indirectly affect sensitive species within areas containing native vegetation. This is a potentially significant impact.

### Operation

**Impact-BIO-9: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Operation of Whole Site Modernization Projects.** For an existing District properties indicated on Table 4.3-2, if a whole site modernization project creates new temporary or permanent noise sources (e.g., construction equipment, new athletics events, public announcement system) adjacent to existing Multi-Habitat Planning Area land areas construction could result in indirect operational impacts on sensitive species. This is a potentially significant impact.

**Impact-BIO-10: Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Operation of Whole Site Modernization Projects.** For an existing District properties indicated on Table 4.3-3, if a whole site modernization project creates new temporary or permanent noise sources (e.g., new athletics events, public announcement system) adjacent to undisturbed

native vegetation, whole site modernization projects could result in indirect operational impacts on sensitive species. This is a potentially significant impact.

## Mitigation Measures

For **Impact-BIO-6**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

For **Impact-BIO-7**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

For **Impact-BIO-8**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

For **Impact-BIO-9**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

For **Impact-BIO-10**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

## Level of Significance After Mitigation

### Construction

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring, which would protect sensitive species and would ensure impacts on these resources would be less than significant. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided.

Implementation of **MM-BIO-1** through **MM-BIO-3** would reduce impacts of the Proposed Program in regard to substantial adverse effects, either directly or indirectly, on any sensitive species. Therefore, with the implementation of **MM-BIO-1** through **MM-BIO-3**, **Impact-BIO-6** through **Impact-BIO-8** would be reduced to less-than-significant levels.

### Operation

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if any biological resources exist on and near the project site, and nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian sensitive vegetation communities, construction fencing, surveys, and monitoring, which would protect sensitive species and would ensure impacts on these resources would be less than significant. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided.

Implementation of **MM-BIO-1** through **MM-BIO-3** would reduce impacts of the Proposed Program in regard to substantial adverse effects, either directly or indirectly, on any sensitive species.

Therefore, with the implementation of **MM-BIO-1** through **MM-BIO-3**, **Impact-BIO-9** and **Impact-BIO-10** would be reduced to less-than-significant levels.

***Threshold 2: Would the Proposed Program 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 CDFW or USFWS?***

## Program-Level Analysis

Project category details including proposed activities under each category, construction equipment required, levels of ground disturbance, and construction time frame can be found under the Threshold 1 impact discussion above.

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

Construction of new District facilities under this category would occur on land currently not owned by the District, and could be either currently developed or undeveloped. At this time, no specific sites are proposed for acquisition, and the locations of any new school or administrative facilities are unknown. There is a potential that currently undeveloped sites could be acquired and developed with new school or administrative facilities. As discussed under Section 4.3.2, *Existing Conditions*, Riparian and sensitive natural communities exist throughout the boundaries of the District and City of San Diego. Construction activities including grading, filling, and ground disturbance could result in the removal or disturbance of riparian habitat or other sensitive natural communities if the construction activities occurred within these habitats. This would result in a substantial adverse effect on these resources and impacts could potentially be significant (**Impact-BIO-16**).

Implementation of **MM-BIO-1, MM-BIO-2**, and **MM-HWQ-1** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to determine the presence of riparian habitat or other sensitive natural communities on or near the project site, and requires nesting bird surveys for any tree or vegetation removal. In the event that a project would involve the removal or disturbance of riparian or sensitive vegetation communities, **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian or sensitive vegetation communities. **MM-HWQ-1** requires a variety of construction BMPs to be implemented throughout the various construction phases in order to protect water quality. Implementation of these mitigation measures would reduce **Impact-BIO-16** to less-than-significant levels.

##### *Operation*

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would involve additional earthwork that may affect riparian habitat or other sensitive natural communities, and no impacts would occur.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-BIO-16: Potential to Have an Adverse Effect on Any Riparian or Other Sensitive Vegetation Community Identified in Local or Regional Plans, Policies, or Regulations, or by the California Department of Wildlife or U.S. Fish and Wildlife Service.** Construction activities including grading, filling, and ground disturbance associated with the Proposed Program could remove existing sensitive riparian or vegetation communities and result in a direct impact. This impact would be potentially significant.

#### *Operation*

No operational activities would result in a substantial adverse effect on riparian or other sensitive vegetation communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. No impacts would occur.

### Mitigation Measures

For **Impact-BIO-16**:

> Implement **MM-BIO-1** and **MM-BIO-2**, as described above, and **MM-HWQ-1: Implement Construction Best Management Practices**, as described in Section 4.9, *Hydrology and Water Quality*.

### Level of Significance After Mitigation

#### *Construction*

**MM-BIO-1** would involve a desktop analysis and/or field visit to determine the presence of riparian habitat or other sensitive natural communities on or near the project site, and requires nesting bird surveys for any tree or vegetation removal. In the event that a project would involve the removal or disturbance of riparian or sensitive vegetation communities, **MM-BIO-2** would require measures that would avoid impacts on sensitive species, such as replacement habitat for riparian or sensitive vegetation communities. **MM-HWQ-1** requires a variety of construction BMPs to be implemented throughout the various construction phases in order to protect water quality. Implementation of these mitigation measures would reduce **Impact-BIO-16** to less-than-significant levels.

#### *Operation*

Operational activities associated with the Proposed Program would not result in direct or indirect impacts on riparian habitat or other sensitive natural communities. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

## All Other Project Categories

### Impact Discussion

#### *Construction*

Construction activities associated with whole site modernization projects, upgrades of existing school and administrative facilities, and joint-use facilities would vary, and would not likely involve

significant clearing and grubbing in previously undisturbed areas because existing school sites are developed and primarily within developed urban communities. Therefore, these project categories would not involve construction activities within riparian or other sensitive natural communities, and impacts would be less than significant.

#### *Operation*

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would involve additional earthwork that may affect riparian habitat or other sensitive natural communities, and no impacts would occur.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with whole site modernization projects, upgrades of existing school and administration facilities, and joint-use facilities would not result in substantial adverse impacts on riparian or other sensitive vegetation communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. Impacts would be less than significant.

#### *Operation*

No operational activities would result in a substantial adverse effect on riparian or other sensitive vegetation communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. No impacts would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with whole site modernization projects, upgrades of existing school and administration facilities, and joint-use facilities, would not result in substantial adverse impacts on riparian or other sensitive vegetation communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. Impacts would be less than significant.

#### *Operation*

No operational activities would result in a substantial adverse effect on riparian or other sensitive vegetation communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. No impacts would occur.

# Site-Specific Analysis

## Impact Discussion

### Construction

Construction activities associated with the near-term, site-specific whole site modernizations would vary, and given that existing school sites are developed and primarily within developed urban communities, near-term, site-specific whole site modernization projects would not involve significant clearing and grubbing of an undisturbed area. Therefore, near-term, site specific whole site modernization projects would not involve construction activities within riparian or other sensitive natural communities, and impacts would be less than significant.

### Operation

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would involve additional earthwork that may affect riparian habitat or other sensitive natural communities, and no impacts would occur.

## Level of Significance Prior to Mitigation

### Construction

Construction activities associated with the near-term, site-specific whole site modernization projects would not result in substantial adverse impacts on riparian or other sensitive vegetation communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. Impacts would be less than significant.

### Operation

Operation of the near-term, site-specific whole site modernization projects would not involve activities that would affect riparian habitat or other sensitive natural communities and no impacts would occur.

## Mitigation Measures

None required.

## Level of Significance After Mitigation

### Construction

No impacts would occur, and no mitigation is required.

### Operation

No impacts would occur, and no mitigation is required.

***Threshold 3: Would the Proposed Program have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?***

## Program-Level Analysis

Project category details including proposed activities under each category, construction equipment required, levels of ground disturbance, and construction time frame can be found under the Threshold 1 impact discussion above.

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

Construction of new District facilities under this category would occur on land currently not owned by the District, and could be either currently developed or undeveloped. At this time, no specific sites are proposed for acquisition, and the locations of any new school or administrative facilities are unknown. There is a potential that currently undeveloped sites could be acquired and developed with new school or administrative facilities. As discussed under Section 4.3.2, *Existing Conditions*, state and federally protected wetlands exist throughout the Program area and it is currently unknown where the District would acquire property and develop new facilities. Construction activities associated with this project category could involve significant clearing and grubbing, grading and excavation, filling and compaction, and other ground-disturbing activities, which could adversely affect state or federally protected wetlands (including, but not limited to, marshes and vernal pools,) through direct removal, filling, hydrological interruption, or other means. Activities could directly affect protected wetlands present on a project site and impacts would be potentially significant (**Impact-BIO-17**).

Implementation of **MM-BIO-1** and **MM-BIO-2** would be required. **MM-BIO-1** would involve a desktop and/or field visit to determine the presence of riparian habitat or other sensitive natural communities on or near the project site, and requires nesting bird surveys for any tree or vegetation removal. In the event that a project site is located in the vicinity of a state or federally protected wetlands, **MM-BIO-2** would require measures that would avoid impacts on these resources. Implementation of these mitigation measures would reduce **Impact-BIO-17** to less-than-significant levels.

##### *Operation*

During operation, activities would be limited to existing facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would involve additional earthwork that may affect state or federally protected wetlands. No impacts would occur.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-BIO-17: Potential to Have an Adverse Effect on State or Federally Protected Wetlands (Including, But Not Limited to, Marshes, Vernal Pools, and Coastal Wetlands) Through Direct Removal, Filling, Hydrological Interruption, or Other Indirect Means.** Construction activities associated with new school or administrative facilities, including significant clearing and grubbing, grading and excavation, filling and compaction, and other ground-disturbing activities could significantly affect state and federally protected wetlands either directly (by occurring within the boundaries of the resource) or indirectly (by occurring within 250 feet of the resource). This is a potentially significant impact.

#### *Operation*

No operational activities would have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means. No impacts would occur.

### Mitigation Measures

For **Impact-BIO-17**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

### Level of Significance After Mitigation

#### *Construction*

**MM-BIO-1** would involve a desktop analysis and/or field visit to determine the presence of state or federally protected wetlands on or in the vicinity of the project site, and requires nesting bird surveys for any tree or vegetation removal. In the event that a project site is located in the vicinity of a state or federally protected wetlands, **MM-BIO-2** would require measures that would avoid impacts on these resources. Implementation of these mitigation measures would reduce **Impact-BIO-17** to less-than-significant levels.

#### *Operation*

No operational activities would have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means. No impacts would occur.

## Whole Site Modernization and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

Challenger Middle School, located within the Mira Mesa cluster, is the only District property known to be adjacent to a vernal pool. However, other District properties may also be located adjacent to vernal pools or wetlands, and any activities occurring within 250 feet of vernal pools have the

potential to impact them. Construction activities associated with whole site modernizations and joint-use fields, including grading or altering existing hydrology flows within 250 feet of vernal pools or wetlands, which could produce runoff into a vernal pool or wetlands, would cause an indirect impact. Any construction activities occurring within vernal pool or wetlands boundaries, including ground disturbance and driving vehicles or equipment over the habitat, would result in direct impacts on vernal pools or wetlands. Therefore, projects that would involve construction activities within state and federally protected wetlands would result in significant impacts (**Impact-BIO-18**).

Implementation of **MM-BIO-1** and **MM-BIO-2** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to determine the presence of riparian habitat or other sensitive natural communities on or near the project site, and requires nesting bird surveys for any tree or vegetation removal. In the event that a project site is located in the vicinity of a state or federally protected wetlands, **MM-BIO-2** would require measures that would avoid impacts on these resources. Implementation of these mitigation measures would reduce **Impact-BIO-18** to less-than-significant levels.

#### *Operation*

During operation, activities would be limited to existing facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would involve additional earthwork that may affect state or federally protected wetlands. No impacts would occur.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-BIO-18: Potential to Have an Adverse Effect on State or Federally Protected Wetlands (Including, But Not Limited to, Marshes, Vernal Pools, and Coastal Wetlands) Through Direct Removal, Filling, Hydrological Interruption, or Other Indirect Means.** Construction activities associated with improvements to existing District properties, including significant clearing and grubbing, grading and excavation, filling and compaction, and other ground-disturbing activities could significantly affect state and federally protected wetlands either directly (by occurring within the boundaries of the resource) or indirectly (by occurring within 250 feet of the resource). This is a potentially significant impact.

#### *Operation*

No operational activities would result in a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes and vernal pools) through direct removal, filling, hydrological interruption, or other means. No impacts would occur.

### Mitigation Measures

For **Impact-BIO-18**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

### Level of Significance After Mitigation

#### *Construction*

**MM-BIO-1** would involve a desktop analysis and/or field visit to determine the presence of state or federally protected wetlands on or in the vicinity of the project site, and requires nesting bird surveys for any tree or vegetation removal. In the event that a project site is located in the vicinity of a state or federally protected wetlands, **MM-BIO-2** would require measures that would avoid impacts on these resources. Implementation of these mitigation measures would reduce **Impact-BIO-18** to less-than-significant levels.

#### *Operation*

No operational activities would result in a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes and vernal pools) through direct removal, filling, hydrological interruption, or other means. No impacts would occur.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Construction activities related to upgrades of existing school and administrative sites would vary, but would occur entirely within the developed areas of any District property and would not involve significant clearing and grubbing. Therefore, upgrades of existing school and administrative sites would not have the potential to affect state and federally protected wetlands and impacts would be less than significant.

#### *Operation*

During operation, activities would be limited to existing facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would involve additional earthwork that may affect state or federally protected wetlands. No impacts would occur.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities related to upgrades of existing school and administrative sites would vary, but would occur entirely within the developed areas of any District property and would not involve significant clearing and grubbing. Therefore, upgrades of existing school and administrative sites would not have the potential to affect state and federally protected wetlands, and impacts would be less than significant.

#### *Operation*

No operational activities would result in a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes and vernal pools) through direct removal, filling, hydrological interruption, or other means. No impacts would occur.

#### Mitigation Measures

No mitigation is required.

#### Level of Significance After Mitigation

##### *Construction*

Impacts would be less than significant, and no mitigation is required.

##### *Operation*

No operational activities would have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means. No impacts would occur.

## Site-Specific Analysis

### Impact Discussion

#### Construction

Construction activities associated with near-term, site-specific whole site modernization projects would vary, and would not likely involve significant clearing and grubbing. However, construction activities occurring adjacent to undisturbed areas could result in indirect impacts on state and federally protected wetlands, including construction activities occurring within 250 feet of a vernal pool. Therefore, near-term, site-specific whole site modernization projects that would involve construction activities within or adjacent to state and federally protected wetlands would result in a significant impact (**Impact-BIO-18**).

Implementation of **MM-BIO-1** and **MM-BIO-2** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to determine the presence of state or federally protected wetlands on or in the vicinity of the project site, and requires nesting bird surveys for any tree or vegetation removal. In the event that a project site is located in the vicinity of a state or federally protected wetlands, **MM-BIO-2** would require measures that would avoid impacts on these resources. Implementation of these mitigation measures would reduce **Impact-BIO-18** to less-than-significant levels.

#### Operation

No operational activities would result in a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes and vernal pools) through direct removal, filling, hydrological interruption, or other means. No impacts would occur.

### Level of Significance Prior to Mitigation

#### Construction

**Impact-BIO-18: Potential to Have an Adverse Effect on State or Federally Protected Wetlands (Including, But Not Limited to, Marshes, Vernal Pools, and Coastal Wetlands) Through Direct Removal, Filling, Hydrological Interruption, or Other Indirect Means.** Construction activities associated with improvements to existing District properties, including significant clearing and

grubbing, grading and excavation, filling and compaction, and other ground-disturbing activities could significantly affect state and federally protected wetlands either directly (by occurring within the boundaries of the resource) or indirectly (by occurring within 250 feet of the resource). This is a potentially significant impact.

#### Operation

No operational activities would result in a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes and vernal pools) through direct removal, filling, hydrological interruption, or other means and no impacts would occur.

### Mitigation Measures

For **Impact-BIO-18**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

### Level of Significance After Mitigation

#### Construction

**MM-BIO-1** would involve a desktop analysis and/or field visit to determine the presence of state or federally protected wetlands on or near the project site, and requires nesting bird surveys for any tree or vegetation removal. In the event that a project site is located in the vicinity of a state or federally protected wetlands, **MM-BIO-2** would require measures that would avoid impacts on these resources. Implementation of these mitigation measures would reduce **Impact-BIO-18** to less-than-significant levels.

#### Operation

No impacts would occur, and no mitigation is required.

***Threshold 4: Would the Proposed Program 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?***

## Program-Level Analysis

Project category details including proposed activities under each category, construction equipment required, levels of ground disturbance, and construction time frame can be found under the Threshold 1 impact discussion above.

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

Construction of new District facilities under this category would occur on land currently not owned by the District, and could be either currently developed or undeveloped. At this time, no specific

sites are proposed for acquisition, and the locations of any new school or administrative facilities are unknown. There is a potential that currently undeveloped sites could be acquired and developed with new school or administrative facilities. As discussed under Section 4.3.2, *Existing Conditions*, the District is almost entirely urban and developed, and the most suitable wildlife corridor is near the northern border of the District in Los Peñasquitos Canyon. The most suitable lands for wildlife connectivity are categorized as MHPA land areas. Educational facilities are not an approved land use within MHPA land; therefore, the District would not construct facilities within existing MHPA lands that may serve as wildlife corridors or native wildlife nursery sites for native or resident migratory wildlife species.

Future District property sites could contain habitat and vegetation suitable for migratory native bird species. Construction activities may involve significant ground disturbance, including clearing and grubbing, that could potentially directly affect native migratory bird and raptor species and could potentially be a significant impact. Additionally, construction activities involving heavy equipment could indirectly affect nesting birds in the vicinity of the project through excessive noise and lighting (**Impact-BIO-19**).

Implementation of **MM-BIO-1** and **MM-BIO-2** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to determine the presence of habitat and vegetation suitable for migratory native bird species on or adjacent to the project site, and requires nesting bird surveys for any tree or vegetation removal. In the event that habitat and vegetation suitable for migratory native bird species exists on or adjacent to the project site, **MM-BIO-2** would require measures that would avoid impacts on these resources. Implementation of these mitigation measures would reduce **Impact-BIO-19** to less-than-significant levels.

#### *Operation*

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would 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, and there would be no impacts.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-BIO-19: Potential to 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 During Construction.** Construction activities associated with new school or administrative facilities could interfere with wildlife movement by disturbing migratory bird species' nesting habitat. This is a potentially significant impact.

#### *Operation*

No operational activities would interfere substantially with the movement of 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 impacts would occur.

### Mitigation Measures

For **Impact-BIO-19**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

### Level of Significance After Mitigation

#### *Construction*

**MM-BIO-1** would involve a desktop analysis and/or field visit to determine the presence of habitat and vegetation suitable for migratory native bird species on or adjacent to the project site, and requires nesting bird surveys for any tree or vegetation removal. In the event that habitat and vegetation suitable for migratory native bird species exists on or adjacent to the project site, **MM-BIO-2** would require measures that would avoid impacts on these resources. Implementation of these mitigation measures would reduce **Impact-BIO-19** to less-than-significant levels.

#### *Operation*

Operational activities associated with the Proposed Program would not result in direct or indirect impacts on the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors, or use of native wildlife nursery sites. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

## All Other Project Categories

### Impact Discussion

#### *Construction*

Whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities projects would occur entirely within existing District properties that are developed, contain buildings and structures, and are paved and graded. The District properties are not within existing established wildlife corridors, as they do not contain appropriate conditions to serve as corridors or nesting sites. No streams or bodies of water are present within District properties that could be inhabited by any native resident or migratory fish species. As identified in Threshold 1, District properties contain vegetation that could provide potentially suitable nesting habitat for migratory birds and raptors. Projects within these project categories could involve the removal of ornamental or native vegetation that could result in direct or indirect impacts on nesting birds, and impacts would be potentially significant (**Impact-BIO-20**).

Implementation of **MM-BIO-1** and **MM-BIO-2** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to determine the presence of habitat and vegetation suitable for migratory native bird species on or adjacent to the project site, and requires nesting bird surveys for any tree or vegetation removal. In the event that habitat and vegetation suitable for migratory native bird species exists on or adjacent to the project site, **MM-BIO-2** would require measures that would avoid impacts on these resources. Implementation of these mitigation measures would reduce **Impact-BIO-20** to less-than-significant levels.

***Operation***

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would 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, and there would be no impacts.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-BIO-20: Potential to 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 During Construction.** Construction activities associated with improvements to existing District facilities could interfere with wildlife movement by disturbing migratory bird species' nesting habitat. This is a potentially significant impact.

***Operation***

No operational activities would interfere substantially with the movement of 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 impacts would occur.

### Mitigation Measures

For **Impact-BIO-20**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

### Level of Significance After Mitigation

***Construction***

**MM-BIO-1** would involve a desktop analysis and/or field visit to determine the presence of habitat and vegetation suitable for migratory native bird species on or adjacent to the project site, and requires nesting bird surveys for any tree or vegetation removal. In the event that habitat and vegetation suitable for migratory native bird species exists on or adjacent to the project site, **MM-BIO-2** would require measures that would avoid impacts on these resources. Implementation of these mitigation measures would reduce **Impact-BIO-20** to less-than-significant levels.

***Operation***

Operational activities associated with the Proposed Program would not result in direct or indirect impacts on the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors, or use of native wildlife nursery sites. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

# Site-Specific Analysis

## Impact Discussion

### Construction

The near-term, site-specific whole site modernization projects would occur entirely within existing District properties that are developed, contain buildings and structures, and are paved and graded. The District properties are not within existing established wildlife corridors, as they do not contain appropriate conditions to serve as corridors or nesting sites. No streams or bodies of water are present within District properties that could be inhabited by any native resident or migratory fish species. As identified in Threshold 1, District properties contain vegetation that could provide potentially suitable nesting habitat for migratory birds and raptors. Therefore, the near-term, site-specific whole site modernization projects could involve the removal of ornamental or native vegetation that could result in direct or indirect impacts on nesting birds, and impacts would be potentially significant (**Impact-BIO-20**).

Implementation of **MM-BIO-1** and **MM-BIO-2** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to determine the presence of habitat and vegetation suitable for migratory native bird species on or adjacent to the project site, and requires nesting bird surveys for any tree or vegetation removal. In the event that habitat and vegetation suitable for migratory native bird species exists on or adjacent to the project site, **MM-BIO-2** would require measures that would avoid impacts on these resources. Implementation of these mitigation measures would reduce **Impact-BIO-20** to less-than-significant levels.

### Operation

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would 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, and there would be no impacts.

## Level of Significance Prior to Mitigation

### Construction

**Impact-BIO-20: Potential to 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 During Construction.** Construction activities associated with improvements to existing District facilities could interfere with wildlife movement by disturbing migratory bird species' nesting habitat. This is a potentially significant impact.

### Operation

No operational activities would interfere substantially with the movement of 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 impacts would occur.

### Mitigation Measures

For **Impact-BIO-20**:

Implement **MM-BIO-1** and **MM-BIO-2**, as described above.

### Level of Significance After Mitigation

#### Construction

**MM-BIO-1** would involve a desktop analysis and/or field visit to determine the presence of habitat and vegetation suitable for migratory native bird species on or adjacent to the project site and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** would identify and mitigate any unanticipated impacts on migratory wildlife and wildlife corridors not identified in this PEIR and requires compliance with the MBTA and would prevent unauthorized take of protected native migratory bird species. These measures would reduce **Impact-BIO-20** to less-than-significant levels.

#### Operation

No impacts would occur, and no mitigation is required.

## *Threshold 5: Would the Proposed Program conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

## Program-Level Analysis

Project category details including proposed activities under each category, construction equipment required, levels of ground disturbance, and construction time frame can be found under the Threshold 1 impact discussion above.

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

Educational facilities on District property (either existing or newly acquired) are not required to comply with local policies or ordinances; therefore, this threshold would only be applicable to non-educational facilities being constructed on new property acquisitions. New administrative facility construction would involve acquisition and construction including significant grading, ground disturbance, and paving within either previously disturbed or undisturbed land. At this time, no specific sites are proposed for acquisition, and the locations of any new administrative facilities are unknown. The District could acquire property adjacent to ESLs as designated by the City's Environmentally Sensitive Lands Ordinance or adjacent to MHPA lands. Depending on the location of acquired District properties, construction activities could cause sediments and other construction materials to drain into ESLs or MHPA lands. Noise could indirectly affect sensitive species within ESLs or MHPA lands. While introducing nonnative invasive species or not providing barriers adjacent to ESLs could cause negative impacts. the landscaping design guidelines provided in the

District Standard Design Guide specify the use of non-invasive plant species and encourage the use of native vegetation where possible, at their facilities. Compliance with the Design Guide would ensure that impacts from nonnative invasive species and, as such, the introduction of invasive species adjacent to ESL or MHPA lands would be less than significant. However, the other activities described above could conflict with the Environmentally Sensitive Lands Ordinance or MSCP, and impacts could potentially be significant (**Impact-BIO-2** and **Impact-BIO-21)**.

Trees designated for protection through the City's Public Tree Protection Policy may be located within areas designated for construction activities as described above. These activities may require removal or cause other impacts on protected trees and impacts could potentially be significant (**Impact-BIO-21**).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if the project site is subject to any local policies or ordinances and/or adjacent to any MHPA areas. In addition, **MM-BIO-1** requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project has the potential to conflict with local policies or ordinances protecting biological resources, **MM-BIO-2** would require measures that would avoid impacts on those resources. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-2** and **Impact-BIO-21** to less-than-significant levels.

#### *Operation*

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would conflict with any local policies or ordinances protecting biological resources and there would be no impacts.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-BIO-2: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.

**Impact-BIO-21: Potential to Conflict With Any Local Policies or Ordinances Protecting Biological Resources, Such as a Tree Preservation Policy or Ordinance, During Construction.** Construction activities associated with new non-educational facilities at new site acquisitions could conflict with the Environmentally Sensitive Lands Ordinance or Public Tree Protection Policy. This is a potentially significant impact.

***Operation***

Operation of new school and administrative facilities would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impacts would occur.

### Mitigation Measures

For **Impact-BIO-2**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

For **Impact-BIO-21**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

**MM-BIO-4**: **Obtain a Tree Removal Permit and Provide Compensatory Mitigation.** Prior to construction for a non-educational facility at a new site acquisition, the District shall apply for a tree removal permit with the City of San Diego and provide compensatory mitigation as required by the City for any protected trees slated for removal.

### Level of Significance After Mitigation

***Construction***

Implementation of **MM-BIO-1** would identify unanticipated conflict with any local policies or ordinances protecting biological resources not included in the Proposed Program analysis and would provide project-specific mitigation measures to avoid impacts on those resources. In addition, **MM-BIO-1** requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** requires compliance with the MBTA to prevent unauthorized take of active nests, which would ensure protection of active nests. **MM-BIO-3** requires fencing to protect sensitive biological resources adjacent to a project site, which would ensure protection of these resources during construction activities, would ensure that indirect impacts on sensitive species from excessive light and noise pollution would be avoided, and would require the District to implement drainage BMPs to avoid toxins, chemicals, or other potentially harmful elements from entering into biologically sensitive lands, which would reduce impacts on riparian and sensitive vegetation communities. **MM-BIO-4** requires that the District avoid and mitigate for impacts on protected trees.

Compliance with **MM-BIO-1** through **MM-BIO-4** would reduce construction-related impacts associated with new administrative facilities in regard to conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, with the implementation of **MM-BIO-1** through **MM-BIO-4**, **Impact-BIO-2** and **Impact-BIO-21** would be reduced to less-than-significant levels.

***Operation***

Operational activities associated with the Proposed Program would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

As noted above, educational facilities on District property (either existing or newly acquired) are not required to comply with local policies or ordinances; therefore, this threshold would only be applicable to non-educational facilities being constructed on new property acquisitions. Whole site modernization projects would not involve construction of non-educational facilities on new site acquisitions. Therefore, these activities would not conflict with the Environmentally Sensitive Lands Ordinance or the City's Public Tree Protection Policy. However, as described under Threshold 1, construction activities associated with whole site modernization could result in indirect impacts on MHPA lands, which would be potentially significant (**Impact-BIO-7**).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if the project site is adjacent to MHPA areas, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project has the potential to conflict with local policies or ordinances protecting biological resources, **MM-BIO-2** would require measures that would avoid impacts on those resources. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-7** to less-than-significant levels.

#### *Operation*

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would conflict with any local policies or ordinances protecting biological resources and there would be no impacts.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-BIO-7: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Whole Site Modernization Projects.** For existing District properties indicated on Table 4.3-2, construction activities associated with whole site modernization projects could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.

#### *Operation*

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would conflict with any local policies or ordinances protecting biological resources and there would be no impacts.

### Mitigation Measures

For **Impact-BIO-7**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

### Level of Significance After Mitigation

#### *Construction*

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if the project site is adjacent to MHPA areas, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project has the potential to conflict with local policies or ordinances protecting biological resources, **MM-BIO-2** would require measures that would avoid impacts on those resources. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-7** to less-than-significant levels.

#### *Operation*

Operational activities associated with the Proposed Program would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

## Upgrades of Existing School and Administrative Sites; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

As noted above, educational facilities on District property (either existing or newly acquired) are not required to comply with local policies or ordinances; therefore, this threshold would only be applicable to non-educational facilities being constructed on new property acquisitions. Construction activities associated with joint-use facilities and upgrade of existing sites would not involve construction of non-educational facilities on new site acquisitions. Therefore, these activities would not conflict with the Environmentally Sensitive Lands Ordinance or the City's Public Tree Protection Policy. However, as described under Threshold 1, activities under these project categories could result in indirect impacts on MHPA lands, which would be potentially significant (**Impact-BIO-11**).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if the project site is adjacent to MHPA areas, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project has the potential to conflict with local policies or ordinances protecting biological resources, **MM-BIO-2** would require measures that would avoid impacts on those resources. In addition, **MM-BIO-3** would

ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-11** to less-than-significant levels.

***Operation***

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would conflict with any local policies or ordinances protecting biological resources and there would be no impacts.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-BIO-11: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities.** For existing District properties listed on Table 4.3-2, construction activities associated with upgrades of existing school and administrative sites or with joint-use facilities could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.

***Operation***

No operational activities would conflict with any local policies or ordinances protecting biological resources. No impact would occur.

### Mitigation Measures

For **Impact-BIO-11**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

### Level of Significance After Mitigation

***Construction***

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if the project site is adjacent to MHPA areas, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project has the potential to conflict with local policies or ordinances protecting biological resources, **MM-BIO-2** would require measures that would avoid impacts on those resources. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-11** to less-than-significant levels.

***Operation***

Operational activities associated with the Proposed Program would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

# Site-Specific Analysis

## Impact Discussion

### Construction

Near-term, site-specific whole site modernization project sites may be situated adjacent to ESLs; however, educational facilities on District property are exempt from compliance with the City's ESL ordinance. In addition, although trees designated for protection through the City's Public Tree Protection Policy may be located within areas designated for construction activities related to the near-term, site-specific whole site modernizations, and these activities may require removal or cause other impacts on protected trees, the District is not required to comply with this ordinance for existing District facilities. Therefore, no impacts related to a conflict with this policy would occur.

However, as noted above, District facilities adjacent to MHPA lands could result in indirect significant impacts on biological resources within those lands in which case the project would conflict with the MSCP, which would result in a potentially significant impact (**Impact-BIO-7**). Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if the project site is adjacent to MHPA areas, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project has the potential to conflict with local policies or ordinances protecting biological resources, **MM-BIO-2** would require measures that would avoid impacts on those resources. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-7** to less-than-significant levels.

### Operation

During operation, activities associated with operation of the near-term, site-specific whole site modernization projects would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would conflict with any local policies or ordinances protecting biological resources and there would be no impacts.

## Level of Significance Prior to Mitigation

### Construction

**Impact-BIO-7: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Whole Site Modernization Projects.** For existing District properties indicated on Table 4.3-2, construction activities associated with whole site modernization projects could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.

### Operation

No operation activities would occur related to a conflict with any local policies or ordinances protecting biological resources.

### Mitigation Measures

For **Impact-BIO-7**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

### Level of Significance After Mitigation

#### Construction

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if the project site is adjacent to MHPA areas, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project has the potential to conflict with local policies or ordinances protecting biological resources, **MM-BIO-2** would require measures that would avoid impacts on those resources. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-7** to less-than-significant levels.

#### Operation

No impacts would occur, and no mitigation is required.

## *Threshold 6: Would the Proposed Program conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?*

## Program-Level Analysis

Project category details including proposed activities under each category, construction equipment required, levels of ground disturbance, and construction time frame can be found under the Threshold 1 impact discussion above.

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

New facility construction would involve acquisition and construction including significant grading, ground disturbance, and paving within either previously disturbed or undisturbed land. At this time, no specific sites are proposed for acquisition, and the locations of any new school or administrative facilities are unknown. There is a potential that currently undeveloped sites could be acquired and developed with new school or administrative facilities. As discussed under Section 4.3.2, *Existing Conditions*, there are MHPA lands within the District boundaries. The City's MSCP dictates compatible land uses with the biological objectives of the MSCP. School facilities are not a compatible land use within the City's MHPA; therefore, new District facilities would not be constructed on MHPA lands. However, the District could acquire property adjacent to MHPA lands for new school facilities. If new District properties are situated on mesas or other land adjacent and at a higher elevation to MHPA land, construction activities could cause sediments and other

construction materials to drain into MHPA lands. Noise from construction equipment could indirectly affect sensitive species within MHPA lands. Additionally, introducing nonnative invasive species or not providing barriers adjacent to MHPA lands could cause negative impacts. These activities could conflict with the City's MSCP, and impacts could potentially be significant (**Impact-BIO-2**).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if the project site is adjacent to any MHPA areas, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. **MM-BIO-2** would require measures that would avoid impacts on those resources. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-2** to less-than-significant levels.

***Operation***

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impacts would occur.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-BIO-2: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.

***Operation***

No operational activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impacts would occur.

### Mitigation Measures

For **Impact-BIO-2**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

### Level of Significance After Mitigation

***Construction***

Implementation of **MM-BIO-1** would identify unanticipated conflict with any local policies or ordinances protecting biological resources not included in the Proposed Program analysis. **MM-BIO-2** and **MM-BIO-3**provide project-specific mitigation measures to avoid impacts on biological resources and require fencing to protect sensitive biological resources adjacent to a project site,

which would ensure protection of these resources during construction activities. These measures would also ensure that indirect impacts on sensitive species from excessive light and noise pollution would be avoided, would require the District to implement drainage BMPs to avoid toxins, chemicals, or other potentially harmful elements from entering into biologically sensitive lands, which would reduce impacts on riparian and sensitive vegetation communities.

Compliance with **MM-BIO-1** through **MM-BIO-3** would reduce construction-related impacts associated with new school or administrative facilities in regard to conflicting with provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. Therefore, with the implementation of **MM-BIO-1** through **MM-BIO-3**, **Impact-BIO-2** would be reduced to less-than-significant levels.

#### *Operation*

No operational activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impacts would occur.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

As described under Threshold 1, construction activities associated with whole site modernization projects could involve the use of heavy equipment that may emit excessive noise and light pollution, which could indirectly affect sensitive species when work is occurring adjacent to MHPA land, which could result in indirect impacts on MHPA lands, which would be potentially significant (**Impact-BIO-7**).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if the project site is adjacent to MHPA areas, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. **MM-BIO-2** would require measures that would avoid impacts on those resources. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-7** to less-than-significant levels.

#### *Operation*

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impacts would occur.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-BIO-7: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Whole Site Modernization Projects.** For existing

District properties indicated on Table 4.3-2, construction activities associated with whole site modernization projects could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.

#### *Operation*

No operational activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impacts would occur.

### Mitigation Measures

For **Impact-BIO-7**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

### Level of Significance After Mitigation

#### *Construction*

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if the project site is adjacent to MHPA areas, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project has the potential to conflict with local policies or ordinances protecting biological resources, **MM-BIO-2** would require measures that would avoid impacts on those resources. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-7** to less-than-significant levels.

#### *Operation*

No operational activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impacts would occur.

## Upgrades of Existing School and Administrative Sites; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

As noted above, educational facilities on District property (either existing or newly acquired) are not required to comply with local policies or ordinances; therefore, this threshold would only be applicable to non-educational facilities being constructed on new property acquisitions. Construction activities associated with upgrades of existing school and administrative sites and joint-use facilities would not involve construction of non-educational facilities on new site acquisitions. Therefore, these activities would not conflict with the Environmentally Sensitive Lands Ordinance or the City's Public Tree Protection Policy. However, as described under Threshold 1, activities under these project categories could result in indirect impacts on MHPA lands, which would be potentially significant (**Impact-BIO-11**).

Implementation of **MM-BIO-1, MM-BIO-2,** and **MM-BIO-3** would be required. **MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if the project site is adjacent to MHPA areas, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. **MM-BIO-2** would require measures that would avoid impacts on those resources. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-11** to less-than-significant levels.

***Operation***

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impacts would occur.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-BIO-11: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities.** For existing District properties listed on Table 4.3-2, construction activities associated with upgrades of existing school and administrative sites or with joint-use facilities could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.

***Operation***

No operational activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impacts would occur.

### Mitigation Measures

For **Impact-BIO-11**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

### Level of Significance After Mitigation

***Construction***

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if the project site is adjacent to MHPA areas, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project has the potential to conflict with local policies or ordinances protecting biological resources, **MM-BIO-2** would require measures that would avoid impacts on those resources. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-11** to less-than-significant levels.

***Operation***

No operational activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impacts would occur.

# Site-Specific Analysis

## Impact Discussion

### Construction

As noted in Table 4.3-3, Valencia Park Elementary is the only near-term, site-specific whole site modernization project situated adjacent to MHPA land. Construction activities at this site could cause sediments and other construction materials to drain into MHPA land. Noise from construction equipment could indirectly affect sensitive species within the MHPA. Additionally, MHPA lands could be disturbed by construction equipment and worker vehicles driving, or from construction personnel walking through the land. These activities could affect MHPA lands and impacts could potentially be significant (**Impact-BIO-7**).

### Operation

During operation, activities would be limited to facilities on District properties, including buildings, recreation areas, walkways, and parking lots, regardless of project category. No activities would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impacts would occur.

## Level of Significance Prior to Mitigation

### Construction

**Impact-BIO-7: Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Whole Site Modernization Projects.** For existing District properties indicated on Table 4.3-2, construction activities associated with whole site modernization projects could cause sediments and other construction materials to drain into Multi-Habitat Planning Area lands. In addition, noise from construction equipment could indirectly affect sensitive species within Multi-Habitat Planning Area lands. This is a potentially significant impact.

### Operation

No operational activities associated with the near-term, site-specific whole site modernization projects would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impacts would occur.

## Mitigation Measures

For **Impact-BIO-7**:

Implement **MM-BIO-1, MM-BIO-2**, and **MM-BIO-3,** as described above.

## Level of Significance After Mitigation

### Construction

**MM-BIO-1** would involve a desktop analysis and/or field visit to ascertain if the project site is adjacent to MHPA areas, and requires nesting bird surveys for any tree or vegetation removal. **MM-BIO-2** and **MM-BIO-3** would provide project-specific mitigation measures to reduce unanticipated impacts on sensitive species, including those not already identified in this PEIR. In the event that a project has the potential to conflict with local policies or ordinances protecting biological resources, **MM-BIO-2** would require measures that would avoid impacts on those resources. In addition, **MM-BIO-3** would ensure impacts on MHPA lands would be avoided. Implementation of these mitigation measures would reduce **Impact-BIO-7** to less-than-significant levels.

### Operation

No impacts would occur, and mitigation is not required.

# Section 4.4
# Cultural Resources

## 4.4.1 Overview

This section describes the existing cultural resources that could be adversely affected by proposed programmatic development activities analyzed in this PEIR and the applicable laws and regulations related to cultural resources. It concludes with an analysis of potential impacts on historical resources, archaeological resources, and discovered human remains.

For purposes of CEQA, cultural resources referred to as *historical resources* consist of intact built environment resources dating from the historic period (50 years old or older) and *archaeological resources*, which include prehistoric resources (pre-contact with Europeans) and historic resources (post-contact Native American and European). CEQA also uses the term *unique archaeological resources* to denote archaeological artifacts, objects, or sites that are not considered historical or archaeological resources but that do contain information needed to answer important scientific research questions, have a special and particular quality, or are directly associated with an important prehistoric or historic event or person (CEQA Section 21083.2(g)).

Table 4.4-1 summarizes the significant impacts and mitigation measures (MMs) discussed in Section 4.4.4.3, *Impacts and Mitigation Measures*.

**Table 4.4-1. Summary of Significant Cultural Resources Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact-CUL-1**: Potential to Cause a Substantial Adverse Change in the Significance of a Historical Resource through Demolition and Construction of a New School or Administrative Facility. | **MM-CUL-1:** Prepare a Historical Resource Evaluation of Buildings, Complexes, and Other Potentially Significant Built Environment Resources 45 Years Old or Older that Are Subject to Demolition or Modification; **MM-CUL-2:** Arrange Archival Documentation of Historical Resources; **MM-CUL-3**: Provide Interpretive and/or Educational Media; **MM-CUL-4:** Ensure | Significant and Unavoidable | **MM-CUL-1** involves identification of historical resources that might be present at new sites, and **MM-CUL-2** and **MM-CUL-3** would reduce impacts on such resources by documenting the historical significance of resources meeting California Register of Historical Resources (CRHR) Criterion 3 to Historic American Buildings Survey (HABS), Historic American Landscape Survey (HALS), and Historic American Engineering Record (HAER) standards and |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | that Any Alteration of Historical Resources Is in Accordance with Secretary of the Interior Standards. | | preparation of interpretive and/or educational media through implementation of **MM-CUL-3.** In addition, **MM-CUL-4** could be implemented for buildings meeting any of the CRHR criteria to reduce impacts by retaining character-defining features. However, these mitigation measures would not be able to reduce impacts to less-than-significant levels in all scenarios. |
| **Impact-CUL-2**: Potential to Cause Substantial Adverse Change in the Significance of a Historical Resource through Physical Alteration During Construction of a New School or Administrative Facility. | **MM-CUL-1:** Prepare a Historical Resource Evaluation of Buildings, Complexes, and Other Potentially Significant Built Environment Resources 45 Years Old or Older that Are Subject to Demolition or Modification; **MM-CUL-2:** Arrange Archival Documentation of Historical Resources; **MM-CUL-3**: Provide Interpretive and/or Educational Media; **MM-CUL-4:** Ensure that Any Alteration of Historical Resources Is in Accordance with Secretary of the Interior Standards. | Significant and Unavoidable | **MM-CUL-1** involves identification of historical resources that might be present at new sites, and **MM-CUL-2** and **MM-CUL-3** would reduce impacts on such resources by documenting the historical significance of resources meeting CRHR Criterion 3 to HABS/HAER/HALS standards and preparation of interpretive and/or educational media through implementation of **MM-CUL-3**. In addition, **MM-CUL-4** could be implemented for buildings meeting any of the CRHR criteria to reduce impacts by retaining character-defining features. However, these mitigation measures would not be able to reduce impacts to less-than-significant levels in all scenarios. |
| **Impact-CUL-5:** Disturbance and/or Destruction of Previously Recorded and/or Undiscovered Archaeological Resources During Construction | **MM-CUL-5**: Prepare an Archaeological Sensitivity Analysis; **MM-CUL-6**: Conduct Archaeological Monitoring. | Less than Significant | The archaeological sensitivity analysis required in **MM-CUL-5** would identify the potential for encountering archaeological resources during ground-disturbing |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| Related to New Acquisition and New School or Administrative Facilities. | | | activities, and the recommendations and the measures included in **MM-CUL-6** would minimize potential damage or loss of subsurface archaeological resources. |
| **Whole Site Modernization** | | | |
| **Impact-CUL-3:** Potential to Cause a Substantial Adverse Change in the Significance of a Historical Resource through Demolition and Construction of Existing District Facilities. | **MM-CUL-1:** Prepare a Historical Resource Evaluation of Buildings, Complexes, and Other Potentially Significant Built Environment Resources 45 Years Old or Older that Are Subject to Demolition or Modification; **MM-CUL-2:** Arrange Archival Documentation of Historical Resources; **MM-CUL-3**: Provide Interpretive and/or Educational Media; **MM-CUL-4:** Ensure that Any Alteration of Historical Resources Is in Accordance with Secretary of the Interior Standards. | Significant and Unavoidable | **MM-CUL-1** involves identification of historical resources that might be present at existing sites, and **MM-CUL-2** and **MM-CUL-3** would reduce impacts on such resources by documenting the historical significance of resources meeting CRHR Criterion 3 to HABS/HAER/HALS standards and preparation of interpretive and/or educational media through implementation of **MM-CUL-3.** In addition, **MM-CUL-4** could be implemented for buildings meeting any of the CRHR criteria to reduce impacts by retaining character-defining features. However, these mitigation measures would not be able to reduce impacts to less-than-significant levels in all scenarios. |
| **Impact-CUL-4:** Potential to Cause Substantial Adverse Change in the Significance of a Historical Resource through Physical Alteration of Existing District Facilities. | **MM-CUL-1:** Prepare a Historical Resource Evaluation of Buildings, Complexes, and Other Potentially Significant Built Environment Resources 45 Years Old or Older that Are Subject to Demolition or Modification; **MM-CUL-2:** Arrange | Significant and Unavoidable | **MM-CUL-1** involves identification of historical resources that might be present at new sites, and **MM-CUL-2** and **MM-CUL-3** would reduce impacts on such resources by documenting the historical significance of resources meeting CRHR Criterion 3 to HABS/HAER/HALS standards and preparation |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | Archival Documentation of Historical Resources; **MM-CUL-3**: Provide Interpretive and/or Educational Media; **MM-CUL-4:** Ensure that Any Alteration of Historical Resources Is in Accordance with Secretary of the Interior Standards. | | of interpretive and/or educational media through implementation of **MM-CUL-3.** In addition, **MM-CUL-4** could be implemented for buildings meeting any of the CRHR criteria to reduce impacts by retaining character-defining features. However, these mitigation measures would not be able to reduce impacts to less-than-significant levels in all scenarios. |
| **Impact-CUL-6:** Disturbance and/or Destruction of Previously Recorded and/or Undiscovered Archaeological Resources. | **MM-CUL-5**: Prepare an Archaeological Sensitivity Analysis; **MM-CUL-6**: Conduct Archaeological Monitoring. | Less than significant | The archaeological sensitivity analysis required in **MM-CUL-5** would identify the potential for encountering archaeological resources during ground-disturbing activities, and the recommendations and the measures included in **MM-CUL-6** would minimize potential damage or loss of subsurface archaeological resources. |
| **Upgrades of Existing School and Administrative Sites** | | | |
| **Impact-CUL-4:** Potential to Cause Substantial Adverse Change in the Significance of a Historical Resource through Physical Alteration of Existing District Facilities. | **MM-CUL-1:** Prepare a Historical Resource Evaluation of Buildings, Complexes, and Other Potentially Significant Built Environment Resources 45 Years Old or Older that Are Subject to Demolition or Modification; **MM-CUL-2:** Arrange Archival Documentation of Historical Resources; **MM-CUL-3**: Provide Interpretive and/or Educational Media; | Significant and Unavoidable | **MM-CUL-1** involves identification of historical resources that might be present at new sites, and **MM-CUL-2** and **MM-CUL-3** would reduce impacts on such resources by documenting the historical significance of resources meeting CRHR Criterion 3 to HABS/HAER/HALS standards and preparation of interpretive and/or educational media through implementation of **MM-CUL-3.** In addition, **MM-CUL-4** could be implemented for buildings |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | **MM-CUL-4:** Ensure that Any Alteration of Historical Resources Is in Accordance with Secretary of the Interior Standards. | | meeting any of the CRHR criteria to reduce impacts by retaining character-defining features. However, these mitigation measures would not be able to reduce impacts to less-than-significant levels in all scenarios. |
| **Impact-CUL-6:** Disturbance and/or Destruction of Previously Recorded and/or Undiscovered Archaeological Resources. | **MM-CUL-5**: Prepare an Archaeological Sensitivity Analysis; **MM-CUL-6**: Conduct Archaeological Monitoring. | Less than Significant | The archaeological sensitivity analysis required in **MM-CUL-5** would identify the potential for encountering archaeological resources during ground-disturbing activities, and the recommendations and the measures included in **MM-CUL-6** would minimize potential damage or loss of subsurface archaeological resources. |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| **Impact-CUL-6:** Disturbance and/or Destruction of Previously Recorded and/or Undiscovered Archaeological Resources. | **MM-CUL-5**: Prepare an Archaeological Sensitivity Analysis; **MM-CUL-6**: Conduct Archaeological Monitoring. | Less than Significant | The archaeological sensitivity analysis required in **MM-CUL-5** would identify the potential for encountering archaeological resources during ground-disturbing activities, and the recommendations and the measures included in **MM-CUL-6** would minimize potential damage or loss of subsurface archaeological resources. |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| **Impact-CUL-7:** Disturbance and/or Destruction of Significant Archaeological Resources. | **MM-CUL-6**: Conduct Archaeological Monitoring (at Crown Point Junior Music Academy and Bernard Asian Pacific Language Academy) | Less than Significant | The recommendations and the measures included in **MM-CUL-6** would minimize potential damage or loss of subsurface archaeological resources. |

# 4.4.2 Existing Conditions

## 4.4.2.1 Setting

### Prehistoric Setting

The following cultural history outlines and briefly describes the known prehistoric cultural traditions of the region. The approximately 10,000 years of documented prehistory of the San Diego region has often been divided into three periods: Early Period (San Dieguito tradition/complex), Archaic Period (Milling Stone Horizon, Encinitas tradition, and La Jolla/Pauma complex), and Late Prehistoric Period (Cuyamaca and San Luis Rey complexes).

#### Early Period Complexes

The Early Period encompasses the earliest documented human habitation in the region. The San Dieguito complex is the earliest reliably dated occupation of the area. The assemblage of artifacts associated with the San Dieguito complex has been studied and elaborated upon extensively (Rogers 1939, 1945, 1966; Warren and True 1961; Warren 1967; Moriarty 1969, 1987). The complex correlates with Wallace's (1955) "Early Man Horizon," and Warren subsequently defined a broader San Dieguito tradition (1968). The earliest component of the Harris Site (CA-SDI-149/316/4935B) is located along the San Dieguito River and is characteristic of the San Dieguito complex (Warren 1966, 1967; Warren and True 1961). Artifacts from the lower levels of the site include leaf-shaped knives, ovoid bifaces, flake tools, choppers, core and pebble hammerstones, several types of scrapers, crescents, and short-bladed shouldered points (Warren and True 1961, Warren 1966). Little evidence for the San Dieguito complex/Early Man Horizon has been discovered north of San Diego County.

Some researchers interpret the San Dieguito complex as having a primarily, but not exclusively, hunting subsistence orientation (Warren 1967, 1968, 1987; Warren et al. 1998). Others see a more diversified San Dieguito subsistence system as possibly ancestral to, or as a developmental stage for, the subsequent, predominantly gathering-oriented complex denoted as the La Jolla/Pauma complex (cf. Bull 1983; Ezell 1987; Gallegos 1985, 1987, 1991; Koerper et al. 1991).

#### Archaic Period Complexes

In the southern coastal region of California, the Archaic Period dates from circa 8,600 years before present (BP) to circa 1300 BP (Warren et al. 1998). The La Jolla/Pauma complex has been identified from the content of archaeological site assemblages dating to this period. These assemblages occur at a range of coastal and inland sites and appear to indicate that a relatively stable and sedentary hunting and gathering complex, possibly associated with one people, was present in the coastal and immediately inland areas of San Diego County for more than 7,000 years. La Jolla/Pauma complex sites are considered to be part of Warren's (1968) Encinitas tradition and Wallace's (1955) Milling Stone Horizon. The inland or Pauma complex aspect of this culture lacks shellfish remains, but is otherwise similar to the La Jolla complex and may, therefore, simply represent a non-coastal expression of the La Jolla complex (True 1958, 1980; True and Beemer 1982). The content of these site assemblages is characterized by manos and metates, shell middens, terrestrial and marine mammal remains, burials, rock features, cobble-based tools at coastal sites, and increased hunting equipment and quarry-based tools at inland sites. Artifact assemblages can also include bone tools,

doughnut stones, discoidals, stone balls, plummets, biface points/knives, Elko-eared dart points, and beads made of stone, bone, and shell. Beginning approximately 5500 BP and continuing during the latter half of the Archaic Period, evidence of hunting and the gathering and processing of acorns gradually increases through time. The evidence in the archaeological record consists of artifacts such as dart points and the mortar and pestle, which are essentially absent during the early Archaic Period. The initial and subsequent increasing use of these technologies during the middle and late Archaic Period constitutes a major transition in how the prehistoric populations interacted with their environment in the southern coastal region. The period of this shift, from circa 4000 to 1300 BP, has been designated as the Final Archaic Period (Warren et al. 1998).

### Late Prehistoric Period Context

In the San Diego area, the Late Prehistoric Period has been described as a time characterized by an increased number of sites and "many technological innovations, and new patterns in material culture and belief systems" (McDonald and Eighmey 1998). This characterization aptly describes the period for the entire San Diego County area. Changes in tool and ornament types, burial practices, and site location choices from those documented for the earlier periods are well documented in the archaeological record and are described below.

As with the earlier periods, archaeologists have defined distinctive complexes for the Late Prehistoric Period prehistoric cultures of the area. Two complexes have been defined for the area's protohistoric occupants. One, designated as San Luis Rey, is identified in southern Orange, western Riverside, and northern San Diego Counties; the other, Cuyamaca, is identified in southern San Diego County (Meighan 1954; True 1966, 1970; True et al. 1974). The San Luis Rey complex is believed to be the progenitor of the Shoshonean-speaking peoples (Luiseño/Juaneño culture) living in the area at the time of historic contact in northern San Diego County (referred to as San Luis Rey of Shoshonean origin) (cf. Koerper 1979). Those of southern San Diego County (Cuyamaca, Yuman), are believed to be the ancestors of the Hokan-speaking Diegueño or Kumeyaay (Ipai/Tipai) occupying southern San Diego County at contact. The demarcation line between the San Luis Rey complex and the Cuyamaca complex is believed to be near the historic separation of the tribal territories of the Luiseño/Juaneño and Diegueño. It is highly unlikely, however, that the boundary remained static over time. During Late Prehistoric times, the Program area would have been within the area commonly associated with the archaeologically defined Diegueño or Kumeyaay (Ipai/Tipai) complex.

Hearths documented at southern San Diego County sites are often clay lined, yet this type of hearth is not found in the northern county sites. The Luiseño/Juaneño of southern Orange and northern San Diego Counties appear to have primarily practiced cremation (Kroeber 1925), but may also have occasionally buried the dead by inhumation. The use of special burial urns for cremations, however, was apparently not common.

## Ethnographic Setting

The Program area is situated within the traditional territory of the people known to the Spaniards as the Diegueño, a term derived from the San Diego Mission Alcalá, with which these people came to be associated. This term was later adopted by anthropologists (Kroeber 1925) and further divided into the southern and northern Diegueño. Shipek (1982) later initiated use of a Yuman language term "Kumeyaay" for the people formerly designated as the Diegueño. The Kumeyaay are traditionally considered to be a hunter-gatherer society characterized by central-based nomadism.

The linguistic and language boundaries as seen by Shipek (1982) subsume the Yuman speakers into a single nomenclature, the Kumeyaay, a name applied previously to the mountain Tipai or Southern Diegueño by Lee (1937), while Almstedt (1974) noted that 'Ipai applied to the Northern Diegueño with Tipai and Kumeyaay for the Southern Diegueño. However, Luomala (1978) has suggested that while these groups consisted of over 30 patrilineal clans, no singular tribal name was used and she referred to the Yuman-speaking people as Iipai/Tipai (Carrico 1998).

As with most hunting-gathering societies (Service 1966), Kumeyaay social organization was formed around culturally defined kinship ties. More specifically, the Kumeyaay possessed a patrilocal type of band organization with band exogamy (marriage outside of one's band) and virilocal marital residence (the married couple integrates into the male's band). The band is often considered synonymous with a village or rancheria, which is a political entity. Following White (1963), Almstedt (1980) has suggested that the term *rancheria* be applied to both a social and geographical unit, as well as to the particular population and territory held in common by a native group or band. She also stressed that the territory for a rancheria might comprise a 30 square mile area. Many households would constitute a village or rancheria, and several villages were part of a much larger social system usually referred to as a consanguineal kin group (cimuL). The cimuL is typically an exogamous, multilocal, patrilineal, consanguineal descent unit, often widely dispersed in local lineage. The members of the cimuL do not intermarry because of their presumed common ancestry, but they maintain close relations and often share territory and resources (Sahlins 1968, Service 1971, Luomala 1963).

Other researchers have designated the San Diego River as a natural feature dividing the Kumeyaay with those people living north of the river being the 'Iipai (Northern Diegueño), and those to its south and into Baja California being the Tipai (Southern Diegueño) (Langdon 1975, Hedges 1975). With a history stretching back at least 2,000 years, the Kumeyaay at the point of contact were, as described by Carrico, settled in permanent villages or rancherias with strong alliances. Carrico has indicated the possible locations for a number of these villages in the San Diego County area (Carrico 1998).

While the Kumeyaay exploited a large variety of terrestrial and marine food sources, emphasis was placed on acorn procurement and processing, as well as the capture of rabbit and deer. Shipek (1989) has strongly suggested that the Kumeyaay, or at least some bands of the Kumeyaay, were practicing proto-agriculture at the time of Spanish contact. While the evidence is problematic, the Kumeyaay were certainly adept land and resource managers with a history of intensive plant husbandry.

The Kumeyaay practiced many forms of spiritualism with the assistance of shamans (kuessay) and cimuL leaders. Spiritual leaders were neither elected nor inherited their position, but achieved status because they knew all the songs involved in ceremonies (Shipek 1991) and had an inclination toward the supernatural. Important Kumeyaay ceremonies included male and female puberty rites, the fire ceremony, the whirling dance, the eclipse ceremony, the eagle dance, and the cremation ceremony, as well as the yearly mourning ceremony (Spier 1923). The primary ceremonial direction among the Kumeyaay is east, with rock art and entrances to ceremonial enclosures usually facing this direction (Kroeber 1925). The Kumeyaay are the only California tribe known to possess a color-direction system where white represents the east, green-blue the south, black the west, and red the north (Kroeber 1925).

# Historic Setting

## Spanish Period

The historic period in California began with the early explorations of Juan Cabrillo in 1542. Cabrillo came ashore on what is now Point Loma to claim the land for Spain and gave it the name San Miguel. Sixty years passed before another European, Sebastían Vizcaíno, entered the bay on November 10, 1602, and gave it the name San Diego (Pourade 1960:49, 66). The original Spanish settlement in San Diego began in 1769 on Presidio Hill and consisted of a presidio (fort) and a chapel that also served as Alta California's first mission. In that same year, an expedition headed by Gaspar de Portolá traveled north from the Presidio de San Diego to extend the Spanish Empire from Baja California into Alta California by seeking out locations for a chain of presidios and missions in the area. The Spanish period extended to 1821 and encompassed early exploration and subsequent establishment of the San Diego presidio and the Mission San Luis Rey. From its original outpost on what is now Presidio Hill, Mission San Diego de Alcalá was moved to roughly its current site in Mission Valley in 1774. In November 1774, the mission was attacked by Tipay warriors from south of the San Diego River who razed the mission and killed Father Luis Jayme and two others. The San Diego mission was rebuilt in 1775, and while one of the least successful missions in the chain of California missions, it firmly established Spain's presence in the region. During this period, Spanish colonists introduced horses, cattle, sheep, pigs, corn, wheat, olives and other agricultural goods and implements, as well as new architecture and methods of building construction (Englehardt 1920:60–64).

Despite such expansion, and amid the growing wealth accumulated by the missions, Spanish colonists maintained an ultimately tenuous grip on the region. While missions such as San Luis Rey flourished economically, threats from within and without increasingly undermined political stability. Indigenous populations declined dramatically due to disease, overwork, and the missions' campaigns to end native ways of life. Instances of native resistance to Spanish authority multiplied across Alta California. Mariners with allegiances to competing colonial powers and trapper-explorers from the east and north increasingly challenged the authority of officials and priests whose problems were of little interest to officials in Spain, which was embroiled in European conflict and declining as a major power (Pourade 1961:176–177; Bean and Rawls 2003:48-52, 54–56).

## Mexican Period

Following Mexico's independence from Spain in 1821, the Mexican period began in San Diego County and lasted until 1848, ending with the conclusion of the Mexican-American War. During this period most Spanish laws and practices continued until shortly before secularization of the missions. Former Presidio soldiers become civilian settlers, the Pueblo of San Diego was established, and the region's Hispanic *Californio* residents expanded transportation routes. During the 1820s, California's economic activity centered upon agriculture and livestock-raising for subsistence and localized markets, and hide and tallow production for the international market (Pourade 1961:182–183, Sherman 2001:23).

After years of political instability and several failed efforts to secularize the missions, in 1834 Governor José Figueroa issued a proclamation defining the terms of the secularization process that would be instituted over the following 2 years. Some large grants of land were made prior to the secularization of mission lands, but those following secularization redistributed the missions' large

grazing holdings, making numerous tracts available and ushering in the Rancho Era. Provisions for assuring that Indians would receive mission land proved of little or no practical benefit to the region's Native Americans. Limits on the slaughter of mission cattle were often ignored by priests who sought immediate profit on the hide market. Governors Juan Batista Alvarado, Manuel Micheltorena, and Pío Pico granted most of California's 500 private ranchos to local officials and retired solders after secularization. *Californio* rancho owners forced members of the Native American population to work on their lands, although those native people living farther afield from the ranchos maintained their traditional life styles longer. However, some former mission Indians organized pueblos and attempted to live within Mexican law and society. The most successful of these was the Pueblo of San Pasqual, founded by Kumeyaay who were no longer able to live at the Mission San Diego de Alcalá (Farris 1997, Bean and Rawls 2003:58–63).

During this period much of the land within the Program area consisted of the Pueblo Lands of San Diego and the church's Rancho de Mission San Diego de Alcalá. In 1823, Captain Francisco María Ruiz, commandant of the San Diego Presidio, received the 8,486-acre Los Peñasquitos Rancho, located within today's District boundaries to the north of the mission and pueblo lands. In 1837 Francisco María Alvarado acquired this land from Ruiz. In1845, newly appointed Governor Pico granted El Rancho del Rey, located south of the pueblo and mission lands, to Don Juan (John) Forster. The name of the 26,631-acre grant was changed to Rancho de la Nacíon ("National Ranch") when Forster acquired the rancho. Forster married Pico's sister, Doña Ysidora, and eventually acquired multiple ranchos in today's San Diego County. The northwest portion of this rancho was located within today's District boundaries (Moyer and Pourade 1969:1, 90–91, 109).

## American Period to 1900

San Diego County was one of the largest of the original counties created by the legislature in 1850, when California became a state, encompassing today's San Bernardino, Imperial, and Riverside Counties, and part of today's Inyo County. San Diego did not experience substantial growth after statehood, and by 1865 Old Town San Diego's population had actually declined to 200. However, in 1867 Alonzo Horton established Horton's Addition, today's downtown San Diego, which had 2,300 residents by 1870. Near the end of that decade, National City's Frank Kimball persuaded the Atchison, Topeka, and Santa Fe Railroad (Santa Fe) to support construction of a transcontinental connection from San Bernardino south to San Diego and National City. This line, the California Southern Railroad, was completed during the early 1880s and eventually acquired by the Santa Fe. Washouts plagued the Temecula Canyon portion of the line approximately 45 miles north of San Diego, which the Santa Fe ultimately abandoned. San Diego became dependent on a coastal branch line north to the main Santa Fe line at Fullerton. The railroad helped swell San Diego's population with newcomers, raised property values, and eventually created a speculative land-boom bubble. With the rising tide of incoming migration during the boom, San Diego's population reached 40,000 in 1888. But after the bust, the ebb of outmigration left the city with 16,000 residents in 1890 (District 1954:5; ICF 2017:5.4–5.5).

### Public School Development

San Diego citizens formed School District No. 1 in 1854. Into the 1960s, school-age children attended classes in seven different rented rooms of Old Town homes. The first public school building, known as the Little Green School, was constructed on Mason Street in 1865. In 1872, a new two-story wood-framed Mason Street School replaced the older building (the 1865 building was eventually relocated back to and reconstructed at the original site as a local landmark). Between 1855 and

1869, San Diego's population of school-age children increased from 117 to 474. The boom of the 1880s led to a wave of new school construction, including substantial new multi-story schools embodying the era's Victorian architectural styles, such as the Russ School (1883) at the site of today's San Diego High School, and the B Street School (1889), neither of which remain standing today (District 1954:5–8).

## Twentieth Century Through World War II

Growth returned to San Diego after the turn of the century. Between 1900 and 1910 the city's population increased from 17,700 to over 39,000. Most of the population remained concentrated in New Town, Old Town, and Golden Hill, but by 1910 notable residential development had spread to Logan Heights, Point Loma, Ocean Beach, Mission Beach, and La Jolla. A network of electric streetcar railway lines also began to encourage residential development farther east. Consolidated under the San Diego Electric Railway, the streetcar system also expanded as part of infrastructural improvements associated with San Diego's 1915 Panama-California Exposition at Balboa Park. San Diego-area residential construction and industrial development were stimulated both by the Exposition and by World War I, the latter of which generated industrial job opportunities that drew newcomers to the city. By 1920, residential development had surrounded Balboa Park (Historic Resources Group 2011:12–13, Griffin and Weeks 2004:79).

Federal military investment locally, combined with economic growth nationally, fueled another building boom in the 1920s. After World War I, Navy planners determined that Japan posed the greatest immediate threat to U.S. interests and committed to moving half of the nation's fleet to the West Coast. San Diego became the home of the Pacific Destroyer Force. By the mid-1920s, the federal government had completed or begun developing the Destroyer Base (today's Naval Base San Diego), the Naval Training Station, the Marine Corps Recruit Base, the Naval Radio Station, the Fleet Fuel Depot, the U.S. Coast Guard Base, and Fort Rosecrans. Naval infrastructure development and a local military payroll that reached $15 million during the 1920s helped to nearly double the local population to 147,995. Residential development grew denser and spread farther east, north, and west. The city's central business district expanded, and manufacturing activity increased (ICF 2016:18).

After the onset of the Great Depression, substantial growth across the local economy did not return to San Diego until World War II. Although the economic fallout of the 1929 stock market crash took longer to reach San Diego than many other parts of the nation, the local economy did eventually falter and require the federal interventions of President Franklin Delano Roosevelt's New Deal. Also cushioning the blow somewhat was the local aerospace industry. Reuben H. Fleet relocated Consolidated Aircraft and its 800-person plant from Buffalo, New York, to San Diego in 1935. Thanks in part to major new Navy aircraft contracts, the company employed 9,000 people by the end of the 1930s. With American entry into World War II, military personnel and defense workers flooded the city, which resulted in a housing crisis. Many newcomers made their homes in trailers and retired trolley cars. The crisis led the federal government to invest in the largest public housing development in U.S. history at the time, Defense Housing Project No. 4092, which became the San Diego community of Linda Vista (City of San Diego 2007:26, 29–35).

### Public School Development

Between 1900 and 1920, the San Diego student population grew from 3,000 to 14,275, plus evening high school and part-time students. In addition to construction of San Diego High School, the School

District developed 16 new elementary schools. In 1924–1925, the City annexed East San Diego (including City Heights) and Normal Heights, and brought Euclid, Central, Hamilton, and Normal Heights into the school system. By the end of the 1920s, overcrowding generated support for a 1928 school bond that funded the replacement of old buildings and construction of new schools. None of the major public school buildings in which San Diego children were educated prior to the 1930s survive today as public education facilities (ASM Affiliates and ICF 2015:1). One notable private school from this period, the Spanish Colonial Revival-style Parker School designed by William Templeton Johnson, is City of San Diego Historic Resources Board Landmark No. 482.

As a result of California's Field Act (or Field Bill), most public school buildings constructed prior to the 1933 Long Beach Earthquake have been replaced across California. A product of that earthquake, which destroyed 70 schools and caused 40 masonry school buildings to be condemned in the greater Los Angeles area, the 1933 Field Act empowered the State Division of Architecture to institute new regulations and codes mandating earthquake resistant buildings. The Field Act and subsequent related legislation resulted in the demolition of numerous two- to three-story monumental San Diego-area school buildings that strongly represented the Neo-Classical, Spanish Colonial Revival, and Mediterranean Revival styles of architecture. In the wake of the 1971 San Fernando Earthquake, the State of California provided new funding for retrofitting or replacing pre-1933 school buildings. As a result, large buildings at La Jolla, Point Loma, and Hoover High Schools—all important examples of major Revival-style civic buildings—had to be demolished (ASM Affiliates and ICF 2015:3–40).

Those and other pre-1930s school buildings continued to serve the community during the Great Depression years. By 1940, the number of students in the district had reached 31,484, and the school district had expanded to 38 elementary schools, 5 junior high schools, 2 junior-senior high schools, 3 high schools (San Diego, La Jolla, and Hoover), a day and evening junior college, a continuation school, and a vocational school. Although school buildings constructed by the New Deal's Works Progress Administration (WPA) have been identified in San Diego, far less federal investment in school development appears to have occurred in San Diego during the 1930s compared to the greater Los Angeles area, where the federal Public Works Administration (PWA) funded extensive school development in the wake of the Long Beach Earthquake. In 1935, the architectural Modernism of the International Style (addressed in more detail below) made its first appearance in the design of a Southern California school in Richard Neutra's design of a major addition to the Corona Avenue School in the Los Angeles community of Bell. However, International-style Modernism would not begin to influence San Diego school design in a substantial way until after World War II (ASM Affiliates and ICF 2015: 4-6).

During the 1930s and early 40s, the Moderne style or styles (Art Moderne or Streamline Moderne, and PWA Moderne) had the greatest influence on public school design in San Diego. Streamline Moderne departed from Art Deco's geometrically ornate surfaces, vertical emphasis, and elements of pre-modern historicism (or "primitivism"). Like the International style, Streamline Moderne had a more horizontal emphasis and dispensed with explicit ornamental references to earlier forms of architecture. Unlike the more purist Modernism of the International Style—which also eschewed ornamentation, though in favor of an aesthetics rooted in the expression of buildings' structural functions—Streamline Moderne reflected a more popular, future-orientated design aesthetic that made use of visual references to transportation technology such as airplanes, trains, and ships. Streamline Moderne buildings incorporated asymmetrical massing, flat roofs, smooth wall surfaces, curving corners, glass-block windows, steel-framed windows, and horizontal string courses. In contrast, PWA Moderne—a prevalent sub-style of school buildings constructed in Los Angeles

schools during the latter 1930s—often retained stripped-down classicism or other restrained historical references. PWA Moderne school buildings typically incorporated recessed and often centered entries framed by columnar pilasters or quoin moldings, sometimes with pediments, as well as large rectangular window openings, fluted patterns borrowed from Art Deco, and sometimes curved corners borrowed from Streamline Moderne (ASM Affiliates and ICF 2015:6).

San Diego-area school buildings with surviving Moderne-style school buildings or buildings influenced by the PWA Moderne style include the Kensington District's Franklin Elementary School, and Linda Vista's Carson Elementary School, Linda Vista Elementary School, and Montgomery Middle School (ASM Affiliates and ICF 2015:6-7).

## Twentieth Century, Post-World War II

Whereas San Diego's population stood at 203,341 in 1940, just prior to World War II, by 1950 the city had 334,387 residents. The spectacular population growth that occurred during World War II would continue during the prosperous 1950s and 1960s. Through local Navy facilities and defense industry contracts, the federal government continued to play a crucial role in the local economy. In addition to military operations, the main drivers of the post-war local economy included the defense industry, the aircraft industry, electronics, shipbuilding and repair, and tourism. The number of San Diegans employed in education also grew after World War II with expansion of San Diego State University, the University of San Diego, and the City College system, the development of the University of California at San Diego, and the dramatically increasing number of public schools locally (City of San Diego 2007:46–48; Pourade 1977:194–196, 221–223).

Prior to and during World War II, most San Diego schools were developed to serve streetcar suburbs such as La Jolla, Point Loma, Mission Hills, North Park, Normal Heights, Kensington, and City Heights, or to serve the planned defense-worker community of Linda Vista. During the 1950s, however, the construction of new public school complexes took place mainly in San Diego's growing new automobile suburbs farther from the city's urban core. These new suburban tract developments were developed in Pacific Beach, La Jolla, Bay Park, Clairemont, Serra Mesa, Allied Gardens, the College and Fairmont areas, Encanto, and the Skyline-Paradise Hills area (City of San Diego 2007:30–32, 36–41, Residential Development Patterns Map).

### Public School Development

In an effort to accommodate the increasing number of school-age children, San Diego voters approved bond issues of $6,866,000 in 1946, $11,806,000 in 1950, and $15,800,000 in 1953 to fund both construction of new schools and improvements to existing ones. Still, throughout the 1940s and 50s, planning and construction of permanent facilities could not keep pace with the increasing student population (District 1954:16). Post-World War II public school complexes developed in San Diego would contrast the city's pre-war schools in ways that reflected the increasing mainstream popularity of architectural Modernism, new indoor-outdoor school planning ideals, and economic imperatives.

Prior to World War II, a few innovative architects working in the United States designed school buildings exhibiting the early architectural Modernism of the International style that would influence post-war school architecture and planning. European in origin, International style architecture embodied a rejection of traditional ornamentation and historical references in favor of buildings that expressed their function and structure through "rational, clean, uncluttered" design. Typically rectilinear in plan with horizontal emphasis, institutional International style buildings

incorporated features such as flat roofs with low parapets or cantilevered overhangs, smooth wall surfaces (concrete, brick, stucco, and steel), square corners, and expansive horizontal bands of steel-frame fixed or sash windows (City of San Diego 2007: 24 [quoted], 58–60). California's earliest influential example of International style school architecture was Richard Neutra's 1934 addition to the Corona Avenue School in the Los Angeles suburb of Bell. Also an early example of indoor-outdoor school design, the building featured movable walls that opened to outdoor courtyard spaces. The Crow Island School in Winnetka, Illinois, which was completed in 1940 and designed by Eliel and Eero Saarinen, Lawrence B. Perkins, E. Todd Wheeler, and Philip Will, Jr., also proved highly influential. Its plan consisted of a central common building and extensive, low-slung, single-story wings with central corridors and projecting L-shaped classrooms incorporating large windows and providing immediate access to courtyard spaces between classrooms (Baker 2012:8, Ogata 2008:564–567).

After World War II, Modernist school designs influenced by Corona Avenue, Crow Island, and a few other pre-war schools proliferated across California. School planner Charles Wesley Bursch and architect John Lyon Reid expressed the growing post-war enthusiasm for Modernist indoor-outdoor school design in 1947. "School architecture," they wrote, "must recognize [that] its forms, dimensions, color, materials, and texture are capable of creating an environment which either attracts or repels the child . . . The school plant designed for the child is unpretentious, open, colorful; spread out planning permits him to blow off steam and breath fresh air . . . the general environment is not forbidding and monumental but is informal and devoid of affectation as the child himself." Completed in in 1949, Reid's influential Montecito School in Martinez, California, embodied the ideals he and Bursch outlined two years earlier. The school consisted of parallel rows of low-rise classroom buildings, open circulation corridors, and L-shaped classrooms with sheltered gardens and yards, all of which, as architectural historian Amy F. Ogata explains, "maximized space and traffic flow, light, and provided integrated areas for indoor and outdoor teaching" (Ogata 2008:568–569 [569 quoted]).

During the 1950s, new school sites in San Diego's expanding automobile suburbs provided opportunities for spatial organization along the lines of Reid's Montecito School. The bulkier and sometimes monumental buildings of pre-war schools gave way to campuses composed of numerous low-slung office and classroom buildings with ample windows, and perhaps an auditorium or gymnasium built to greater heights. As Ogata explains, post-war school "architects across the country used poured-concrete slabs for low-rise structures, lightweight steel frames . . . and expanses of glass" to create buildings that fit the indoor-outdoor planning vision while satisfying demands for low-cost construction. Open-air corridors covered by projecting eaves or by canopies typically supported by steel pipe columns replaced double-loaded interior circulation corridors. As part of this shift, the site plans of schools in San Diego and across California and much of the United States underwent substantial change. Architects and planners dispersed buildings across campus sites in a decentralized manner that allowed for greater interplay between indoor and outdoor space. The finger plan, the earliest new type of school plan, featured one or two main canopy-sheltered trunk corridors from which similarly designed classrooms buildings branched perpendicularly. Classroom buildings were initially one room wide with entries and circulation corridors on one side, and large window bays on the opposite side facing landscaped outdoor spaces. Cluster plan campuses emerged to address space limitations. Instead of classroom buildings radiating from a trunk corridor, cluster plans organized classroom buildings as modular clusters of rooms connected by sheltered corridors between courtyards and otherwise landscaped outdoor spaces. Over time, space limitations also led to development of condensed finger plan schools and

schools that combined elements of finger and cluster plans. Within a Cold War context of students performing "duck-and-cover" drills in preparation for potential nuclear attack, observers praised the new decentralized finger- and cluster-plan schools as easier to evacuate than older public schools composed of largely multistory school buildings with interior circulation corridors (Brown 1988:68–90, Ogata 2008:569, Sapphos Environmental, Inc. 2014:92–103).

Although post-war school design in San Diego registered the influence of innovative pre-war International-style schools, it did not generally follow the trend in Meisian International-style architecture toward dematerialization of building forms—the extensive use of glass or glass and paneled curtain walls associated with the work of Meis van der Rohe. Post-war San Diego school buildings typically retained more solidity than Meisian International-style buildings, though at least a single wall of every classroom would be dominated by a large window bay containing stacks of typically steel-framed fixed and operable sashes, and later aluminum-framed sliding and fixed sashes. During the latter 1940s and early 1950s some new school buildings incorporated limited features associated with the Late Moderne architecture, such as flat roofs, boxy massing, cantilevered entry canopies, protruding entry frames, rectilinear molding, and scored concrete. However, such buildings were generally low cost structures that did not strongly embody the Late Modern style (Gelernter 1999:266–269, GEI Consultants, Inc. and Mead and Hunt, Inc. 2017:3.6–3.7, Los Angeles Conservancy 2019).

Most post-World War II San Diego school buildings are best classified as Modern or Mid-Century Modern. Over time, the flat roofs typical of the International and Moderne styles gradually gave way to low-pitched shed or gable roofs with broadly projecting eaves, as well as more boldly V-shaped or butterfly roofs. Finish materials included combinations of stucco, brick, scored concrete, concrete block, and in some cases wood. Window openings grew larger at some schools, nearly qualifying as window walls in a few cases such as Audubon Elementary School, designed by San Diego master architect Samuel W. Hamill. Other notable architects who designed post-war San Diego public schools in Modern idioms included Clyde Hufbauer, Lloyd Ruocco, Roy Drew, and Frank Hope Jr. The indoor-outdoor designs of post-war schools increased the importance of landscaping, and in 1947 the District hired its first full-time landscape architect, Jane Minshall, who designed campus plantings, circulation features, and playgrounds until her retirement in the 1970s (City of San Diego 2007:92, Freeley et al. 2011, Gelernter 1999:266–269, Minshall 1974, Ogata 2008:568–569, Pitman n.d., *San Diego Tribune* 1954).

# 4.4.2.2 Existing Cultural Resources

## Historical Resources (Built Environment)

Of the 226 school sites within the Program area, 179 contain permanent buildings that are at least 45 years old. The specific schools, organized by cluster, are identified in Chapter 2*, Environmental Setting*. Schools and school buildings qualify as historical resources under CEQA when they retain historical integrity and meet one of the four criteria for listing in the California Register of Historical Resources (CRHR), or are listed in the National Register of Historic Places are (NRHP) are automatically listed the CRHR. A school or school building can be eligible for listing in the CRHR for association with an important event or pattern of events in California history or cultural heritage (Criterion 1); for association with the lives of persons important to our past (Criterion B); for embodying distinctive characteristics of a type, period, region, or method of construction, for representing the work of a master, or possessing high artistic values (Criterion C); or for yielding or

possessing potential to yield information important to history (Criterion D). The NRHP, the CRHR and its significance criteria, the seven aspects of historical integrity, and their relationship to CEQA are addressed below in Section 4.4.3, *Applicable Laws and Regulations*.

Prior to studies conducted in support of this PEIR, 38 schools had been evaluated and found not eligible for the CRHR listing by Secretary of the Interior (SOI)-qualified architectural historians. Each of these 38 schools were found not to meet any of the CRHR significance criteria or to contain buildings that meet any of the CRHR significance criteria individually; therefore, none of these 38 schools contain historical resources under CEQA.

In addition, the District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.4-2. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the whole site modernization project category, as described further in Chapter 3, *Project Description*.

**Table 4.4-2. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019.

Thirteen of these 21 schools had not been evaluated previously. Therefore, qualified architectural historians conducted an evaluation of each as part of this PEIR. Neither the 13 school campuses nor any of the individual buildings over 45 years old at those schools were found to meet any of the criteria for listing in the CRHR; therefore, neither those schools nor any of their individual buildings

qualify as a historical resource under CEQA. Those evaluations are documented in Department of Recreation (DPR) 523 forms attached to cultural resources technical memos available for reference in Appendix F.

Table 4.4-3 lists each of the 51 District schools that have been evaluated and found not to contain any buildings qualifying as historical resources under CEQA.

**Table 4.4-3. School Complexes Evaluated and Found Ineligible for CRHR Listing**

| School | Address | Zip Code | Evaluating Consultant, Year |
|---|---|---|---|
| Adams Elementary School | 4672 35th Street | 92116 | ASM Affiliates, Inc., 2015 |
| Alcott Elementary School | 4680 Hidalgo Avenue | 92117 | PaleoWest Archaeology, 2018 |
| Baker Elementary School | 4041 T Street | 92113 | ICF, 2019 |
| Balboa Elementary School | 1844 South 40th Street | 92113 | ICF, 2016 |
| Barnard Elementary School (demolished) | 2930 Barnard Street | 92110 | ICF, 2013 |
| Barnard Asian Pacific Language Academy (formerly Bayview Terrace Elementary School) | 2445 Fogg Street | 92109 | PaleoWest Archaeology, 2018 |
| Bird Rock Elementary School | 5371 La Jolla Hermosa Avenue | 92037 | PaleoWest Archaeology, 2018 |
| Boone Elementary School | 7330 Brookhaven Road | 92114 | ICF, 2019 |
| Cadman Elementary School | 4370 Kamloop Avenue | 92117 | PaleoWest Archaeology, 2018 |
| Correia Middle School (formerly Collier Junior High School) | 4302 Valeta Street | 92107 | ICF, 2019 |
| Crawford High School | 4191 Colts Way | 92115 | ICF, 2012 |
| Crown Point Junior Music Academy | 4033 Ingraham Street | 92120 | ICF, 2019 |
| Albert Einstein Academy Elementary School (formerly Brooklyn Elementary School) | 3035 Ash Street | 92102 | ICF, 2019 |
| Emerson-Bandini Elementary School (formerly Emerson Elementary School) | 3510 Newton Avenue | 92113 | ICF, 2016 |
| Euclid Elementary School | 4166 Euclid Avenue | 92105 | ICF, 2019 |
| Field Elementary School | 4375 Bannock Avenue | 92117 | PaleoWest Archaeology, 2018 |
| Grant K-8 School (formerly Grant Elementary School) | 1425 Washington Place | 92103 | ASM Affiliates, Inc. 2015 |
| Hamilton Elementary School | 2807 Fairmount Avenue | 92105 | ICF, 2012 |
| Hawthorne Elementary School | 4750 Lehrer Drive | 92117 | ICF, 2016 |
| Innovation Middle School (formerly MacDowell Elementary School) | 5095 Arvinels Avenue | 92117 | ICF, 2015 |
| Kearny High School Complex | 1954 Komet Way | 92111 | ICF, 2019 |

| School | Address | Zip Code | Evaluating Consultant, Year |
|---|---|---|---|
| King-Chavez Arts, Athletics and Primary 3-5 (formerly Stockton Elementary School) | 415 31st Street | 92102 | ICF, 2016 |
| La Jolla High School | 750 Nautilus Street | 92037 | ICF, 2014 |
| Language Academy K-8 (formerly Montezuma Elementary School) | 4961 64th Street | 92115 | ICF, 2016 |
| Lewis Middle School | 5170 Greenbrier Avenue | 92120 | ICF, 2019 |
| Madison High School | 4833 Doliva Drive | 92117 | PaleoWest Archaeology, 2018 |
| Mann Middle School | 4345 54th Street | 92115 | ICF, 2012 |
| Marshall Elementary School | 3550 Altadena Avenue | 92105 | ICF, 2019 |
| Memorial Preparatory Middle School (formerly Memorial Junior High School) | 2850 Logan Avenue | 92113 | ICF, 2017 |
| Mission Bay High School | 2475 Grand Avenue | 92109 | ICF, 2013 |
| Muirlands Middle School | 1056 Nautilus Street | 92037 | ICF, 2016 |
| Oak Park Elementary School | 2605 54th Street | 92114 | ICF, 2019 |
| O'Farrell Community Charter School (formerly O'Farrell Junior High School) | 6130 Skyline Drive | 92114 | ICF, 2012 |
| Pacific Beach Elementary School | 1234 Tourmaline Street | 92109 | PaleoWest Archaeology, 2018 |
| Pacific Beach Middle School | 4676 Ingraham Street | 92109 | ASM Affiliates, 2016 |
| Pacific View Leadership Elementary School (formerly Lee Elementary School) | 6196 Childs Avenue | 92139 | ICF, 2019 |
| Paradise Hills Elementary School | 5816 Alleghany Street | 92139 | ICF, 2019 |
| Perry Elementary School | 6290 Oriskany Road | 92139 | ICF, 2019 |
| Pershing Middle School | 8204 San Carlos Drive | 92119 | ICF, 2012 |
| Point Loma High School | 2335 Chatsworth Boulevard | 92106 | ASM Affiliates, Inc., 2015 |
| Roosevelt Middle School | 3366 Park Boulevard | 92103 | PaleoWest Archaeology, 2018 |
| Rowan Elementary School | 1755 Rowan Street | 92105 | PaleoWest Archaeology, 2018 |
| San Diego Cooperative Charter School (formerly Barton Elementary School) | 7260 Linda Vista Road | 9211 | ICF, 2016 |
| Sequoia Elementary School | 4690 Limerick Avenue | 92117 | PaleoWest Archaeology, 2018 |
| Sessions Elementary School | 2150 Beryl Street | 92109 | PaleoWest Archaeology, 2018 |
| Taft Middle School | 9191 Gramercy Drive | 92123 | ICF, 2014 |
| Torrey Pines Elementary School | 8350 Cliffridge Avenue | 92037 | PaleoWest Archaeology, 2018 |
| Valencia Park Elementary School | 5880 Skyline Drive | 92114 | ICF, 2019 |
| Whitman Elementary School | 4050 Appleton Street | 92117 | ICF, 2014 |
| Wilson Middle School | 3838 Orange Avenue | 92105 | ICF, 2014 |

In addition to the 51 schools that have been fully evaluated for CRHR eligibility, two schools addressed in Table 4.4-4, Hoover High School and Clairemont High School, have been partially evaluated for development projects involving an individual building or a portion of the campus encompassing multiple buildings. One of these schools contains a building found eligible for CRHR listing, thereby qualifying it as a historical resource under CEQA. Both schools contain one or more buildings over 45 years of age that have not been evaluated for CRHR eligibility.

**Table 4.4-4. Partially Evaluated Schools**

| School | Address | Zip Code | CRHR Eligible Building (Criteria) | Buildings Found Not Eligible for CRHR Listing | Evaluating Consultant, Year |
|---|---|---|---|---|---|
| Clairemont High School | 4150 Ute Drive | 92117 | None | Buildings 100/ 01-01* & 01-02; 200/01-03 & 01-04; 300/01-05 & 01-06; 400/ 01-07; 500/01-10 & 01-11; 700/ 01-08; 800/01-12 | PaleoWest Archaeology, 2018 |
| Hoover High School | 4474 El Cajon Boulevard | 92115 | ***Building 1200/04-06 & 10-13, Criteria 1 and 3*** | Building 200 (Auditorium)/ 08-11, Demolished | ASM Affiliates, Inc., 2013, 2014 |

* Building numbers with four digits (XX-XX) are from the schools' small scale plot plans on file with the District.

Another 3 schools with buildings over 45 years old have been evaluated and found ineligible for CRHR listing as a whole, but also found to contain one building eligible for individual CRHR listing. In these cases, the school as whole does not qualify as a historical resource under CEQA, but the building found eligible for individual CRHR listing does qualify as a historical resource. Table 4.4-5 identifies these schools and their CRHR-eligible buildings.

**Table 4.4-5. Evaluated Schools Found Ineligible for CRHR Listing that Contain One or More Buildings Found Individually Eligible for CRHR Listing**

| School | Address | Zip Code | CRHR Eligible Building (Criteria) | Evaluating Consultant, Year |
|---|---|---|---|---|
| Jefferson Elementary School | 3770 Utah Street | 92104 | ***Building 100/ 07-08, Criterion 3*** | PaleoWest Archaeology, 2018 |
| La Jolla Elementary School | 1111 Marine Street | 92037 | ***Building 5/05-05, Criterion 3*** | PaleoWest Archaeology, 2018 |
| Twain Main High School (formerly Twain Elementary School) | 6402 Linda Vista Road | 92111 | ***Building 1 (Kindergarten)/01-01, Criterion 3*** | ICF, 2019 |

* Building numbers with four digits (XX-XX) are from the schools' small scale plot plans on file with the District.

Five schools formed entirely or predominantly of buildings over 45 years old have been evaluated and found eligible for CRHR listing as a school complex. In these cases, the school as whole qualifies as a historical resource under CEQA. Table 4.4-6 identifies these schools and the significance criterion or criteria under which they qualify for CRHR listing.

**Table 4.4-6. Evaluated Schools Found Eligible for CRHR Listing**

| School | Address | Zip Code | CRHR Criteria | Buildings Over 45 Years Old that Do Not Contribute to School Significance | Evaluating Consultant, Year |
|---|---|---|---|---|---|
| Audubon K-8 | 8111 San Vicente Street | 92114 | ***Criterion 3*** | Classroom Addition/ Building 02-06 | ICF, 2014 |
| Carson Elementary School | 6905 Kramer Street | 92111 | ***Criteria 1 and 3*** | None | ICF, 2018 |
| Franklin Elementary School | 4481 Copeland Avenue | 92116 | ***Criteria 1 and 3*** | None | ESA, 2019 |
| Mission Bay High School | 2475 Grand Avenue | 92109 | ***Criterion 3*** | None | ICF, 2013 |
| Muirlands Middle School (formerly Muirlands Junior High School) | 1056 Nautilus Street | 92037 | ***Criterion 3*** | None | ICF, 2016 |

* Building numbers with four digits (XX-XX) are from the schools' small scale plot plans on file with the District.

## Archaeological Resources

Comprehensive archaeological sensitivity analyses conducted for District properties typically include consulting several sources of information including record search results, a Sacred Lands file search, available historic maps, historic aerial photography, Sanborn fire insurance maps, geotechnical investigations reports, and small-scale plot plans for each school. A review of these sources illustrates the history of development and disturbances at each school property. Pedestrian archaeological surveys are typically not conducted as school properties are generally landscaped, paved, or built over with little to no native ground surface visible.

In addition, with regards to the 21 site-specific school sites identified in Table 4.4-2, all were analyzed for archaeological sensitivity, including both historic resources and archaeological resources. The two sections below describe the results of the archaeological sensitivity analysis. Table 4.4-7 follows and lists all 62 school sites where a comprehensive archaeological sensitivity analysis was conducted previously. Of the 62 school sites that have undergone a comprehensive archaeological evaluation, 10 were recommended as having prehistoric or historic archaeological sensitivity; 52 did not present archaeological sensitivity.

### Record Search

A record search was requested from the South Coastal Information Center (SCIC). The SCIC is the local repository acting on behalf of the State Office of Historic Preservation's California Historical Resources Information System (CHRIS). The request was for 15 schools and a quarter-mile buffer around the school parcel. The results of the record search were provided on August 29, 2019. In addition to the requested record search for 15 schools, records searches were previously conducted in 2017 and 2018 for Clairemont High School, Pacific Beach Elementary School, Roosevelt Middle School, and Madison High School, and a property immediately adjacent to Perkins K-8.

The record search results were positive for archaeological resources for two schools (Crown Point Junior Music Academy and Barnard Asian Pacific Language Academy).

In addition to the record search conducted by SCIC, ICF archaeologists conducted research into historic maps, historic aerial photographs, Sanborn fire insurance maps, geotechnical investigations reports, and small-scale plot plans for each school to determine age and extent of development and disturbances and the potential for historic archaeology at each of the 21 schools. The results indicated that none of the 21 schools had potential for historic archaeology either because the area was developed post 1950s or has undergone extensive grading during redevelopment of the property.

## Native American Consultation

A Sacred Lands file search was requested from the Native American Heritage Commission (NAHC) for all the 21 schools. The NAHC responded on October 9, 2019, stating that the Sacred Lands file search results were positive. Eight schools were identified as having sacred lands either on the school property or within the vicinity. The letter also indicated that Viejas Band of Kumeyaay Indians and the Kumeyaay Cultural Repatriation Committee should be contacted for information.

**Table 4.4-7. School Sites with Previous Comprehensive Archaeological Sensitivity Analysis**

| School | Address | Zip Code | Evaluating Consultant, Year | Archaeologically Sensitive |
|---|---|---|---|---|
| Aero Drive Acquisition | 8825 and 8875 Aero Drive | 92123 | ICF, 2016 | No |
| Audubon Elementary School | 8111 San Vicente Street | 92114 | ICF, 2014 | No |
| Baker Elementary School | 4041 T Street | 92113 | ICF, 2019 | No |
| Balboa Elementary School | 1844 South 40th Street | 92113 | ICF, 2016 | Yes |
| Barnard Elementary School (demolished) | 2930 Barnard Street | 92110 | ICF, 2013 | No |
| Barnard Asian Pacific Language Academy (formerly Bayview Terrace Elementary School) | 2445 Fogg Street | 92109 | ICF, 2019 | Yes |
| Bell Middle School | 620 Briarwood Road | 92139 | ICF, 2012 | No |
| Boone Elementary School | 7330 Brookhaven Road | 92114 | ICF, 2019 | No |
| Carson Elementary School | 6905 Kramer Street | 92111 | ICF, 2018 | No |
| Clairemont High School | 4150 Ute Drive | 92117 | ICF, 2019 | No |
| Correia Middle School (formerly Collier Junior High School) | 4302 Valeta Street | 92107 | ICF, 2019 | No |
| CPMA Middle School | 5050 Conrad Avenue | 92117 | ICF, 2016 | No |
| Crawford High School | 4191 Colts Way | 92115 | ICF, 2012 | No |
| Crown Point Junior Music Academy | 4033 Ingraham Street | 92120 | ICF, 2019 | Yes |

| School | Address | Zip Code | Evaluating Consultant, Year | Archaeologically Sensitive |
|---|---|---|---|---|
| Cubberley Elementary School | 3201 Marathon Drive | 92123 | ICF, 2016 | No |
| Curie Elementary | 4080 Governor Drive | 92122 | ICF, 2018 | No |
| Albert Einstein Elementary School (formerly Brooklyn Elementary School) | 3035 Ash Street | 92102 | ICF, 2019 | Yes |
| E.B. Scripps Elementary School | 11778 Cypress Canyon Road | 92131 | ICF, 2016 | No |
| Emerson-Bandini Elementary School (formerly Emerson Elementary School) | 3510 Newton Avenue | 92113 | ICF, 2016 | Yes |
| Encanto Elementary School | 822 65th Street | 92114 | ICF, 2016 | No |
| Euclid Elementary School | 4166 Euclid Avenue | 92105 | ICF, 2019 | No |
| Fulton K-8 (formerly Fulton Elementary School) | 7055 Skyline Drive | 92114 | ICF, 2019 | No |
| Gage Elementary School | 6811 Bisby Lake Avenue | 92119 | ICF, 2016 | No |
| Hamilton Elementary School | 2807 Fairmount Avenue | 92105 | ICF, 2012 | No |
| Innovation Middle School (formerly MacDowell Elementary School) | 5095 Arvinels Avenue | 92117 | ICF, 2015 | No |
| Kearny High School | 1954 Komet Way | 92111 | ICF, 2019 | No |
| King-Chavez Arts, Athletics and Primary 3-5 (formerly Stockton Elementary School) | 415 31st Street | 92102 | ICF, 2016 | Yes |
| La Jolla High School | 750 Nautilus Street | 92037 | ICF, 2014 | No |
| Lewis Middle School | 5170 Greenbrier Avenue | 92120 | ICF, 2019 | No |
| Linda Vista Elementary School | 2772 Ulric Street | 92111 | ICF, 2016 | No |
| Logan K-8 | 2875 Ocean View Boulevard | 92113 | ICF, 2017 | Yes |
| Madison High School | 4833 Doliva Drive | 92117 | ICF, 2019 | No |
| Mann Middle School | 4345 54th Street | 92115 | ICF, 2012 | No |
| Marshall Elementary School | 3550 Altadena Avenue | 92105 | ICF, 2019 | No |
| Marvin Elementary School | 5720 Brunswick Avenue | 92120 | ICF, 2016 | No |

| School | Address | Zip Code | Evaluating Consultant, Year | Archaeologically Sensitive |
|---|---|---|---|---|
| Memorial Preparatory Academy (formerly Memorial Junior High School) | 2850 Logan Avenue | 92113 | ICF, 2017 | Yes |
| Mira Mesa High School | 10510 Marauder Way | 92126 | ICF, 2016 | No |
| Mission Bay High School | 2475 Grand Avenue | 92109 | ICF, 2013 | Yes |
| Morse High School | 6905 Skyline Drive | 92114 | ICF, 2016 | No |
| Nye Elementary School | 981 Valencia Parkway | 92114 | ICF, 2016 | No |
| Oak Park Elementary School | 2605 54th Street | 92114 | ICF, 2019 | No |
| O'Farrell Community Charter School (formerly O'Farrell Junior High School) | 6130 Skyline Drive | 92114 | ICF, 2012 | No |
| Pacific Beach Elementary School | 1234 Tourmaline Street | 92109 | ICF, 2019 | No |
| Pacific View Leadership Elementary School (formerly Lee Elementary School) | 6196 Childs Avenue | 92139 | ICF, 2019 | No |
| Paradise Hills Elementary School | 5816 Alleghany Street | 92139 | ICF, 2019 | No |
| Henry High School | 6702 Wandermere Drive | 92120 | ICF, 2017 | No |
| Perkins Elementary School | 1770 Main Street | 92113 | ICF, 2019 | No |
| Perry Elementary School | 6290 Oriskany Road | 92139 | ICF, 2019 | No |
| Pershing Middle School | 8204 San Carlos Drive | 92119 | ICF, 2012 | No |
| Roosevelt Middle School | 3366 Park Boulevard | 92103 | ICF, 2019 | No |
| Rowan Elementary School | 1755 Rowan Street | 92105 | ICF, 2019 | No |
| San Diego Cooperative Charter School (formerly Barton Elementary School) | 7260 Linda Vista Road | 92111 | ICF, 2016 | No |
| Scripps Ranch High School | 10410 Falcon Way | 92131 | ICF, 2015 | No |
| Serra High School | 5156 Santo Road | 92124 | ICF, 2016 | No |
| Taft Middle School | 9191 Gramercy Drive | 92123 | ICF, 2014 | No |
| Tierrasanta Elementary School | 5450 La Cuenta Drive | 92124 | ICF, 2016 | No |
| Twain Main High School (formerly Twain Elementary School) | 6402 Linda Vista Road | 92111 | ICF, 2019 | No |
| Valencia Park Elementary School | 5880 Skyline Drive | 92114 | ICF, 2018 | No |

| School | Address | Zip Code | Evaluating Consultant, Year | Archaeologically Sensitive |
|---|---|---|---|---|
| Whitman Elementary School | 4050 Appleton Street | 92117 | ICF, 2014 | No |
| William Penn Elementary School | 2797 Utica Drive | 92139 | ICF, 2016 | No |
| Wilson Middle School | 3838 Orange Avenue | 92105 | ICF, 2014 | Yes |
| Zamorano Elementary School | 2655 Casey Street | 92139 | ICF, 2016 | No |

In addition to the 62 schools where a comprehensive archaeological sensitivity analysis was conducted, 12 schools have had a record search and/or site visit conducted but were not analyzed for potential prehistoric or historic archaeological sensitivity. Table 4.4-8 lists these 12 schools and their archaeological sensitivity.

**Table 4.4-8. School Sites with Previous Partial Archaeological Sensitivity Analysis**

| School | Address | Zip Code | Evaluating Consultant, Year | Archaeologically Sensitive |
|---|---|---|---|---|
| Alcott Elementary School | 4680 Hidalgo Avenue | 92117 | PaleoWest, 2018 | Unknown |
| Bird Rock Elementary School | 5371 La Jolla Hermosa Ave, La Jolla, | 92037 | PaleoWest, 2018 | Unknown |
| Cadman Elementary School | 4370 Kamloop Avenue | 92117 | PaleoWest, 2018 | Unknown |
| Magnolia Science Academy 6-8 | 6525 Estrella Avenue | 92120 | ASM Affiliates, Inc., 2016 | Unknown |
| Field Elementary School | 4375 Bannock Avenue | 92117 | PaleoWest, 2018 | Unknown |
| Hawthorne Elementary School | 4750 Lehrer Drive | 92117 | PaleoWest, 2018 | Unknown |
| Jefferson Elementary School | 3770 Utah Street | 92104 | PaleoWest, 2018 | Unknown |
| La Jolla Elementary School | 1111 Marine Street | 92037 | PaleoWest, 2018 | Unknown |
| Point Loma High School | 2335 Chatsworth Boulevard | 92106 | ASM Affiliates, Inc., 2015 | Unknown |
| Sequoia Elementary School | 4690 Limerick Avenue | 92117 | PaleoWest, 2018 | Unknown |
| Sessions Elementary School | 2150 Beryl Street | 92109 | PaleoWest, 2018 | Unknown |
| Torrey Pines Elementary School | 8350 Cliffridge Avenue | 92037 | PaleoWest, 2018 | Unknown |

# 4.4.3 Applicable Laws and Regulations

## 4.4.3.1 Federal

### National Historic Preservation Act Section 106

Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 Code of Federal Regulations [CFR]) 800, as amended in 1999), require that federal agencies and entities that they fund or license consider the effects of their actions on properties that are listed in the NRHP, or that may be eligible for such listing. To determine whether an undertaking could affect NRHP-eligible properties, cultural resources, including historical and architectural properties, must be inventoried and evaluated. Although compliance with Section 106 is the responsibility of the lead federal agency, others can conduct the work necessary to comply.

The Section 106 review process consists of four steps.

1. Initiate the Section 106 process by establishing the undertaking, developing a plan for public involvement, and identifying other consulting parties.
2. Identify *historic properties* (resources that are eligible for inclusion in the NRHP) by determining the scope of efforts, identifying cultural resources in the area potentially affected by the project, and evaluating resources' eligibility for NRHP inclusion.
3. Assess adverse effects by applying the Section 106 criteria of adverse effect to identified historic properties.
4. Resolve adverse effects by consulting with the State Historic Preservation Officer (SHPO) and other consulting agencies, including the Advisory Council on Historic Preservation if necessary, to develop an agreement that addresses the treatment of historic properties.

### National Register of Historic Places

The NRHP is the nation's master inventory of known historic properties. It is administered by the National Park Service in conjunction with the SHPO. The NRHP includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. The NRHP criteria and associated definitions are outlined in *National Register* Bulletin 15, *How to Apply the National Register Criteria for Evaluation* (U.S. Department of the Interior, National Park Service 1988). The following summarizes Bulletin 15.

Resources (structures, sites, buildings, districts, and objects) more than 50 years of age can be listed in the NRHP provided they meet the evaluative criteria described below. However, properties less than 50 years of age that are of exceptional importance or are contributors[1] to a district, and that also meet the evaluative criteria, can be included in the NRHP as well.

[1] A *contributor* is a building, site, structure, or object that adds to the historic associations or historic architectural qualities for which a property is significant. The contributor was present during the period of significance, relates to the documented significance of the property, possesses historic integrity, provides important information about a period, or independently meets the NRHP criteria. A *non-contributor* does not add to the historic associations or historic architectural qualities because it was not present during the period of significance; has experienced alterations, disturbances, additions, or other changes; or does not independently meet the NRHP criteria.

The NRHP includes four criteria under which a structure, site, building, district, or object can be considered sufficiently significant for listing on the NRHP.

A. Resources associated with events that have made a significant contribution to the broad patterns of history.

B. Resources associated with the lives of persons significant in our past.

C. Resources that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

D. Resources that have yielded or may likely yield information important in prehistory or history.

Resources can be listed individually in the NRHP or as contributors to a historic district.

When nominating a resource to the NRHP, one must evaluate and clearly state the significance of that resource to American history, architecture, archaeology, engineering, or culture. A resource can be individually significant if it meets any of the above-stated criteria; only one criterion needs to be met for the eligibility of the resource to be considered.

A resource may be considered eligible for listing on the NRHP if it meets one or more of the above-stated criteria for significance and possesses *integrity*. Historic properties must retain their integrity to convey their significance. Although the evaluation of integrity is sometimes a subjective judgment, it must always be grounded in an understanding of the resource's physical features and how they relate to its significance. The NRHP recognizes seven aspects or qualities, listed below, that define integrity.

- **Location:** the place where the historic property was constructed or the place where the historic event occurred.
- **Design:** the combination of elements that create the form, plan, space, structure, and style of a property.
- **Setting:** the physical environment of a historic property.
- **Materials:** the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- **Workmanship:** the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- **Feeling:** a property's expression of the aesthetic or historic sense of a particular period of time.
- **Association:** the direct link between an important historic event or person and a historic property.

To retain historic integrity, a resource should possess several of the above-stated aspects. The retention of specific aspects of integrity is essential for a resource to convey its significance. When the integrity of a resource is being evaluated, the resource should also be considered in comparison to similar properties; such comparison may be important for determining physical features that are essential to reflect the significance of a historic context.

# 4.4.3.2 State

## California Environmental Quality Act and Public Resources Code Section 5024.1 (California Register of Historical Resources)

CEQA requires public agencies to evaluate the implications of their project(s) on the environment and includes significant historical resources as part of the environment. According to CEQA, a project that causes a *substantial adverse change* in the significance of a *historical resource* or a *unique archaeological* resource has a significant effect on the environment (State CEQA Guidelines 15064.5, Public Resources Code [PRC] Section 21083.2).

CEQA defines a substantial adverse change as follows.

- Physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.
- Demolition or material alteration of the physical characteristics that convey the resource's historical significance and justify its designation as a *historical resource*.

Public agencies must treat any cultural resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant (14 California Code of Regulations [CCR] 15064.5). A historic resource is considered significant if it meets the definition of a historical resource or unique archaeological resource.

The term historical resource includes but is not limited to any object, building, structure, site, area, place, record, or manuscript that is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California (PRC Section 5020.1(j)). Historical resources may be designated as such through three different processes.

1. Official designation or recognition by a local government pursuant to local ordinance or resolution (PRC Section 5020.1(k))
2. A local survey conducted pursuant to PRC Section 5024.1(g)
3. Listing in or eligibility for listing in the NRHP (PRC Section 5024.1(d)(1))

The process for identifying historical resources is typically accomplished by applying the criteria for listing in the CRHR (14 CCR 4852). The CRHR is very similar to the NRHP program. It was enacted in 1992, and its regulations became official January 1, 1998. The CRHR is administered by the Office of Historic Preservation and was established to serve as an authoritative guide to the State's significant historical and archaeological resources (PRC Section 5024.1). State law provides that in order for a property to be considered eligible for listing in the CRHR, it must be significant under any of the following four criteria, which parallel NRHP criteria.

1. Is the property associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage?
2. Is the property associated with the lives of persons important in our past?
3. Does the property embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master or possesses high artistic values?

4. Has the property yielded, or may be likely to yield, information important in prehistory or history?

To be considered a historical resource for the purposes of CEQA, the resource must also have *integrity*, which is the authenticity of a resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance.

Resources, therefore, must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is eligible for listing in the CRHR (14 CCR 4852(c)).

Resources listed in the NRHP are automatically included in the CRHR.

## Health and Safety Code 7050.5/Public Resources Code 5097.9

Health and Safety Code 7050.5 addresses the protection of human remains discovered in any location other than a dedicated cemetery and makes it a misdemeanor for any person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law, except as provided in PRC Section 5097.99. It further states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in PRC Section 5097.98. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact the NAHC by telephone within 24 hours. Whenever the NAHC receives notification of a discovery of Native American human remains from the county coroner, it shall immediately notify those people it believes to be the Most Likely Descendants of the deceased Native American. The descendants may inspect the site of the discovery and make recommendations on the removal or reburial of the remains.

## California Government Code Section 6254 (r) and 6254.10

California Government Code Sections 6254(r) and 6254.10 of the California Public Records Act were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to:

> "Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission." Section 6254.10 specifically exempts from disclosure requests for "records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a state or local agency.

### 4.4.3.3 Local

District-managed properties are not under the jurisdiction of the City of San Diego. For example, project-level District actions at existing school properties within the city of San Diego are not subject to review and approval by the City of San Diego's Historical Resources Board. Consequently, the significance criteria outlined in the Historical Resources Guidelines of the City of San Diego's *Land Development Manual* is not used to evaluate cultural resources within District-owned properties.

## 4.4.4 Impact Analysis

### 4.4.4.1 Methodology

Impacts on historical and archaeological resources are determined based on the sensitivity or significance of identified resources and the direct and indirect impacts that would result from reasonably foreseeable future development that could occur under the Proposed Program. If direct or indirect impacts would occur on significant historical or archaeological resources, mitigation measures would be required.

Criteria to determine the significance of historical resources are summarized in Section 4.4.3, *Applicable Laws and Regulations*. Physical effects on historical resources typically include direct disturbance and/or destruction of a resource and occur during construction. Aesthetic effects on historical resources typically consist of indirect impacts, such as changes to the visual or auditory landscape. The demolition or substantial alteration of a historical resource would constitute a significant impact.

For archaeological resources, potential impacts could occur for reasonably foreseeable future development projects that result in disturbance and/or destruction of previously recorded and/or undiscovered archaeological resources. The disturbance and/or destruction of archaeological resources would be considered a significant impact. Impacts on existing religious or sacred uses, including buried human remains, include direct disturbance and/or destruction of historical resources that have religious or sacred value, or indirect impacts on the visual or auditory landscape, such as the construction of a building that blocks the view of an important landmark or use of operational equipment that consistently produces noise. Any direct or indirect impact on religious or sacred uses or human remains would be considered a significant impact.

### 4.4.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining the significance of impacts associated with cultural resources resulting from implementation of the Proposed Program. The determination of whether a cultural impact would be significant is based on the thresholds described below and the professional judgment of the District as Lead Agency and the recommendations of qualified personnel at ICF, all of which is based on the evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following.

1. Cause a substantial adverse change in the significance of a historical resource as defined by Section 15064.5 of the State CEQA Guidelines.

2. Cause a substantial adverse change in the significance of an archaeological resource as defined by Section 15064.5 of the State CEQA Guidelines.
3. Disturb any human remains, including those interred outside of formal cemeteries.

# 4.4.4.3 Impacts and Mitigation Measures

***Threshold 1: Would the Proposed Program cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

***Construction***

Buildout of the Proposed Program would potentially include the construction of new schools at new sites, including charters and associated administrative facilities. The construction of new school and administrative facilities could entail acquisition of properties that do not contain existing school or administrative buildings, but do contain existing buildings and other built environment resources over 45 years old and not historically associated with District educational or administrative activities. Such buildings and other built environment elements could have architectural and/or historical significance unrelated to school design or the history of public education locally. Construction activities associated with these project categories could require demolition of existing buildings and other built environment resources over 45 years old.

Demolition associated with new acquisition and new school or administrative facilities at new or existing school sites, could destroy a building or complex of multiple buildings known to qualify as a historical resource. Such demolition activities could also involve buildings that have not been formally evaluated for CRHR eligibility. Demolition of a CRHR-eligible building or complex would result in a substantial adverse change in the significance of a historical resource, which would be a significant impact (**Impact-CUL-1**). In addition, it is possible that the District would acquire a new site with existing buildings and choose to renovate those buildings instead of demolish them. Renovations associated with new school or administrative facilities could include upgrades that would physically alter existing school buildings. Such potential alterations consist of window and door replacement, installation of exterior conduit, new exterior finish material, and new signage, including digital marquee signs. Installation of new fencing as part of a new site acquisition has the potential to alter the physical character of an existing site or school complex. These upgrades could involve buildings known to qualify as historical resources and buildings and complexes over 45 years old that have not been evaluated for CRHR eligibility to determine if they qualify as historical resources. It is possible that some upgrades to an existing building or complex that qualifies as a historical resource could occur without causing a significant impact. However, upgrades that would eliminate important character-defining features that express a historical resource's significance, and/or that diminish the resource's historical integrity such that it no longer conveys its significance, could result in a substantial adverse change in the significance of a historical resource. Therefore, impacts from upgrades at a new site acquisition that physically alter a building or complex qualifying as a historical resource would be significant (**Impact-CUL-2**).

Implementation of **MM-CUL-1, MM-CUL-2,** and **MM-CUL-3** would be required. Implementation of **MM-CUL-1** will provide for identification of historical resources that might be present at sites acquired by the District for new school construction. By documenting the historical significance and character-defining features of historical resources meeting CRHR Criterion 3 to Historic American Buildings Survey (HABS), Historic American Landscape Survey (HALS), and Historic American Engineering Record (HAER) archival photograph and written-data standards, **MM-CUL-2** would reduce impacts on such resources present at any sites acquired by the District for new school development. Preparation of interpretive and/or educational media through implementation of **MM-CUL-3** in cases of historical resources meeting CRHR Criteria 1 and/or 2 would also reduce impacts on such resources present at newly acquired sites. Implemented in combination, **MM-CUL-2** and **MM-CUL-3** would reduce impacts on historical resources with significance under CRHR Criteria 1 or 2 and CRHR Criterion 3.

Based on the CRHR criterion met by the historic building or complex, **MM-CUL-2** and/or **MM-CUL-3** would be implemented in combination with **MM-CUL-1** to determine if any historical resources are present at sites acquired for new school development. If implementation of these mitigation measures results in project activities that diminish the integrity of a historical resource to a limited extent and eliminate only non-essential character-defining features, then, depending on which CRHR criterion is met, **MM-CUL-2** and/or **MM-CUL-3** could potentially reduce impacts to a less-than-significant level. In addition, **MM-CUL-4** could be implemented for buildings meeting any of the CRHR criteria to reduce impacts by retaining character-defining features and thereby maintaining the historic integrity of the structure. However, **MM-CUL-1**, **MM-CUL-2**, **MM-CUL-3** and/or **MM-CUL-4** would not reduce impacts to a less-than-significant level in all potential scenarios. For example, if a new property acquisition and new school or administration facility development requires demolition of a historical resource, or requires that a historical resource be altered in ways that result in substantial adverse change in its significance, then impacts would remain significant. Therefore, **Impact-CUL-1** and **Impact-CUL-2** would remain significant and unavoidable after implementation of **MM-CUL-1**, **MM-CUL-2**, **MM-CUL-3,** and **MM-CUL-4.**

***Operation***

Operations associated with new acquisition and new school or administrative facilities would not demolish, physically alter, or otherwise diminish the historical integrity of a building or school complex qualifying as a historical resource under CEQA. No impact on a historical resource would occur.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-CUL-1**: **Potential to Cause a Substantial Adverse Change in the Significance of a Historical Resource through Demolition and Construction of a New School or Administrative Facility.** Demolition and construction activities associated with new acquisition and new school or administrative facilities could result in significant impacts on historical resources through demolition of existing buildings or complexes. Any demolition of a known or yet-to-be identified California Register of Historical Resources (CRHR)-eligible building or complex would constitute a significant impact on a historical resource. Some improvements to known or yet-to-be identified CRHR-eligible buildings could result in a significant impact on a historical resource.

**Impact-CUL-2**: **Potential to Cause Substantial Adverse Change in the Significance of a Historical Resource through Physical Alteration During Construction of a New School or Administrative Facility**. Alterations of existing buildings and complexes associated with construction of new school or administrative facilities could result in significant impacts on historical resources. Depending on the degree and nature of such modifications planned for specific buildings and complexes, impacts on historical resources could be less than significant in some cases. However, a significant impact on a historical resource would occur if any modifications diminished the historical integrity and eliminated character-defining features of a California Register of Historical Resources (CRHR)-eligible building or complex so as to result in substantial adverse change in the significance of a historical resource. In such instances, impacts would be significant.

***Operation***

There would be no impacts on historical resources related to operations associated with new acquisitions or new school or administrative facilities.

### Mitigation Measures

For **Impact-CUL-1** and **Impact-CUL-2**:

**MM-CUL-1**: **Prepare a Historical Resource Evaluation of Buildings, Complexes, and Other Potentially Significant Built Environment Resources 45 Years Old or Older that Are Subject to Demolition or Modification.** A Historical Resource Evaluation (HRE) shall be required at existing school sites or newly acquired sites when the following conditions apply: (1) construction activity would potentially demolish or otherwise alter an existing 45-year-old or older building, complex, or structure; and (2) that building, complex, or structure has not previously been evaluated for California Register of Historical Resources (CRHR) eligibility to determine if it qualifies as a historical resource under CEQA. Prior to any approval of a future project proposed for existing school properties or a property acquired for school development, the District shall retain a cultural resources specialist who meets or exceeds the Secretary of the Interior Qualifications Standards for architectural historian to define an appropriate historical resources study area for the project. The study area shall account for potential direct and indirect impacts on historical resources. The architectural historian shall survey and research the study area to identify built resources known to qualify as a historical resource under CEQA as a result of previous evaluation or designation, and shall record and formally evaluate built resources not previously designated that could potentially qualify as historical resources under CEQA. Evaluations shall apply CRHR significance criteria and integrity considerations. The recorded resources and resource evaluations shall be documented in California Department of Recreation (DPR) 523 forms. When a historical resource is present in the study area, an architectural historian shall analyze project actions to determine if the project would result in a significant impact on the historical resource. The District shall make such a finding if the proposed project would result in the following:

- Demolish or materially alter the qualities that make the resource eligible for listing in the CRHR (State CEQA Guidelines Section 15064.5[b][2][A],[C]).
- Demolish or materially alter the qualities that justify the inclusion of the resource on a local register or its identification in an historical resources survey meeting the requirements of California Public Resources Code (PRC) Section 5024.1(g), unless the District establishes by

a preponderance of evidence that the resource is not historically or culturally significant (State CEQA Guidelines Section 15064.5[b][2][B]).

- Alter, directly or indirectly, the qualities that make a resource eligible for listing in the National Register of Historic Places (NRHP) (36 CFR 800.5[a][1]).
- Cause a substantial adverse change in the significance of an historical resource (California PRC Section 21084.1).

The District shall make these findings prior to the approval of any project examined under the measure.

**MM-CUL-2**: **Arrange Archival Documentation of Historical Resources.** For existing and new schools and administrative sites, the District shall arrange for preparation of archival documentation to reduce impacts on historical resources that meet California Register of Historical Resources Criterion 3, as architecturally significant historical resources, as important examples of a master architect or builder's work, and/or as resources that embody distinctive characteristics of a type, period, or method of construction. The District shall retain a Secretary of the Interior qualified preservation professional to document such resources through archival photography, physical description, and historical narrative to be distributed to one or more appropriate local repositories. Potentially appropriate repositories include the San Diego Public Library, the San Diego History Center, other local historical societies, and local university library special collections. Archival documentation of historical resources would be prepared in accordance with the National Parks Service's guidelines for Historic American Buildings Survey, Historic American Landscape Survey, and Historic American Engineering Record documentation. The documentation shall provide a record of the resource's character-defining features prior to alteration, the historical context of its development, and other historical information pertinent to its significance. The level and degree of documentation would be commensurate with size, extent, and level of the documented historical resource's significance.

**MM-CUL-3**: **Provide Interpretive and/or Educational Media.** For existing and new schools and administrative sites, the District shall arrange for preparation of interpretive and/or educational media to reduce impacts on historical resources that meet California Register of Historical Resources Criterion 1 for direct association with an important event or pattern of events, or Criterion 2 for direct association with the work of a historically significant individual. The District shall retain an Secretary of the Interior qualified historic preservation professional to prepare or advise on the preparation of appropriate interpretive and/or educational media such as displays in public spaces, print materials, or websites. Interpretive and educational media may incorporate written, photographic, and archival documentation (such as those compiled according to National Parks Service's guidelines for Historic American Buildings Survey, Historic American Landscape Survey, and Historic American Engineering Record), oral history interviews, video, or animation to tell the story of the heritage represented by the impacted resource. Interpretive media is an appropriate mitigation for built resources qualifying as historical resources under CEQA not for their design qualities, but rather, for their significant associations with events that have made a significant contribution to the broad patterns of San Diego's or California's history and cultural heritage, or for their significant associations with the principle noteworthy activities of individuals important to our past. The District shall evaluate any interpretive and/or educational media proposals and determine the effectiveness of such measures at reducing project-specific impacts as part of the discretionary approval of any project under this Program with the potential to impact historic resources.

**MM-CUL-4**: **Ensure that Any Alteration of Historical Resources Is in Accordance with Secretary of the Interior Standards.** For existing and new schools and administrative sites, to the extent feasible, the District shall retain a Secretary of the Interior (SOI)-qualified historic preservation professional (subject to District approval) to assist in the preparation of design measures that provide for improvements to a historical resource that conform to SOI Standards for the Treatment of Historic Properties (SOI Standards) When feasible, District staff shall work with an SOI-qualified historic preservation professional to redesign project elements so that proposed improvements do not result in a substantial adverse change in the significance of a historical resource. Design measures shall provide for improvements to be undertaken so as to ensure that the subject historical resource sufficiently retains historical integrity and the character-defining features that convey its significance. This process shall include preparation of a character-defining feature inventory if an adequate one does not exist, design consultation with an SOI-qualified professional to ensure compliance with SOI Standards, and plan review and approval by an SOI-qualified professional. Depending on the level of the historical resource significance and the scope of alterations to be undertaken, this process may also require the SOI-qualified professional to participate in preconstruction meetings and conduct construction monitoring to ensure and document compliance with the applicable SOI Standards. Where feasible, the District shall also consider relocation of a historical resource subject to potential demolition at a site acquired for new school development in accordance with SOI Standards.

Prior to project approval, the District will consider the steps taken pursuant to this measure and determine residual significance for any project to which this measure applies

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-CUL-1** will provide for identification of historical resources that might be present at sites acquired by the District for new school construction. By documenting the historical significance and character-defining features of historical resources meeting CRHR Criterion 3 to HABS/HAER/HALS archival photograph and written-data standards, **MM-CUL-2** would reduce impacts on such resources present at any sites acquired by the District for new school development. Preparation of interpretive and/or educational media through implementation of **MM-CUL-3** in cases of historical resources meeting CRHR Criteria 1 and/or 2 would also reduce impacts on such resources present at newly acquired sites. Implemented in combination, **MM-CUL-2** and **MM-CUL-3** would reduce impacts on historical resources with significance under CRHR Criteria 1 or 2 and CRHR Criterion 3.

Based on the CRHR criterion met by the historic building or complex, **MM-CUL-2** and/or **MM-CUL-3** would be implemented in combination with **MM-CUL-1** to determine if any historical resources are present at sites acquired for new school development. If implementation of these mitigation measures results in project activities that diminish the integrity of a historical resource to a limited extent and eliminate only non-essential character-defining features, then, depending on which CRHR criterion is met, **MM-CUL-2** and/or **MM-CUL-3** could potentially reduce impacts to a less-than-significant level. In addition, **MM-CUL-4** could be implemented for buildings meeting any of the CRHR criteria to reduce impacts by retaining character-defining features and thereby maintaining the historic integrity of the structure. However, **MM-CUL-1**, **MM-CUL-2**, **MM-CUL-3** and/or **MM-CUL-4** would not reduce impacts to a less-than-significant level in all potential scenarios. For example, if a new property acquisition and new school or administration facility development

requires demolition of a historical resource, or requires that a historical resource be altered in ways that result in substantial adverse change in its significance, then impacts would remain significant. Therefore, **Impact-CUL-1** and **Impact-CUL-2** would remain significant and unavoidable after implementation of **MM-CUL-1** through **MM-CUL-4.**

#### *Operation*

There would be no impacts on historical resources during operations associated with new acquisitions and new school or administrative facilities.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

Buildout of the Proposed Program would potentially include whole site modernization projects, which could entail major reconstruction of existing schools. At existing school sites, reconstruction could require demolition of existing buildings and other built environment resources over 45 years old. Such buildings and other built environment elements could have architectural and/or historical significance unrelated to school design or the history of public education locally. Construction activities associated with whole site modernization could require demolition of existing buildings and other built environment resources over 45 years old.

As discussed in Section 4.4.2.2, *Existing Cultural Resources*, 51 of the District's existing school sites have been evaluated and found not to meet any of the criteria for listing in the CRHR; therefore, neither those schools nor any of their individual buildings qualify as a historical resource under CEQA. Demolition at these 51 sites has no potential to result in significant impacts unless it involves buildings that will reach the age threshold for consideration as potential historical resources during the coming decade; demolition of a building not previously evaluated for individual CRHR eligibility that then reaches that age threshold could result in a significant impact on a historical resource. The remaining 175 existing school sites have not been subject to a comprehensive evaluation and therefore could contain buildings or campuses that are eligible for listing in the CRHR, and thus could be considered historical resources under CEQA.

Demolition associated with whole site modernization of existing school facilities could destroy a building or complex of multiple buildings known to qualify as a historical resource. Such demolition activities could also involve buildings that have not been formally evaluated for CRHR eligibility. Demolition of a CRHR-eligible building or complex would result in a substantial adverse change in the significance of a historical resource, which would be a significant impact (**Impact-CUL-3**). Renovations associated with whole site modernizations could include upgrades that would physically alter existing school buildings. Such potential alterations consist of window and door replacement, installation of exterior conduit, new exterior finish material, and new signage, including digital marquee signs. Installation of new fencing as part of whole site modernization has the potential to alter the physical character of an existing site or school complex. These upgrades could involve buildings known to qualify as historical resources and buildings and complexes over 45 years old that have not been evaluated for CRHR eligibility to determine if they qualify as historical resources. It is possible that some upgrades to an existing building or complex that qualifies as a historical resource could occur without causing a significant impact. However, upgrades that would eliminate important character-defining features that express a historical

resource's significance, and/or that diminish the resource's historical integrity such that it no longer conveys its significance, could result in a substantial adverse change in the significance of a historical resource. Therefore, impacts from whole site modernization projects that physically alter a building or complex qualifying as a historical resource would be significant (**Impact-CUL-4**).

Implementation of **MM-CUL-1, MM-CUL-2, and MM-CUL-3** would be required. **MM-CUL-1** will provide for identification of historical resources that might be present at sites proposed for demolition as part of a whole site modernization project. This mitigation measure would also provide for analysis of potential impacts on historical resources that might be present at existing school sites that meet the threshold criteria for further analysis, as described above. By documenting the historical significance and character-defining features of historical resources meeting CRHR Criterion 3 to HABS/HAER/HALS archival photograph and written-data standards, **MM-CUL-2** would reduce impacts on such resources present at any sites acquired by the District for new school development, and at existing school properties subject to whole site modernization. Preparation of interpretive and/or educational media through implementation of **MM-CUL-3** in cases of historical resources meeting CRHR Criteria 1 and/or 2 would also reduce impacts on such resources present at newly acquired sites or existing school properties. Existing school sites in particular are more likely to have significance under CRHR Criterion 3 than CRHR Criteria 1 or 2. However, it is possible that District school buildings or complexes could meet CRHR Criteria 1 or 2 while also meeting CRHR Criterion 3, or could meet all three criteria. Implemented in combination, **MM-CUL-2** and **MM-CUL-3** would reduce impacts on historical resources with significance under CRHR Criteria 1 or 2 and CRHR Criterion 3.

Based on the CRHR criterion met by the historic building or complex, **MM-CUL-2** and/or **MM-CUL-3** would be implemented in combination with **MM-CUL-1** to determine if any historical resources are present at sites acquired for new school development, and at existing school properties that have not recently been studied. If implementation of these mitigation measures results in project activities that diminish the integrity of a historical resource to a limited extent and eliminate only non-essential character-defining features, then, depending on which CRHR criterion is met, **MM-CUL-2** and/or **MM-CUL-3** could potentially reduce impacts to a less-than-significant level. In addition, **MM-CUL-4** could be implemented for buildings meeting any of the CRHR criteria to reduce impacts by retaining character-defining features and thereby maintaining the historic integrity of the structure. However, **MM-CUL-1**, **MM-CUL-2**, **MM-CUL-3** and/or **MM-CUL-4** would not reduce impacts to a less-than-significant level in all potential scenarios. For example, if a new property acquisition and new school or administration facility development requires demolition of a historical resource, or requires that a historical resource be altered in ways that result in substantial adverse change in its significance, then impacts would remain significant. Therefore, **Impact-CUL-3** and **Impact-CUL-4** would remain significant and unavoidable after implementation of **MM-CUL-1**, **MM-CUL-2**, **MM-CUL-3,** and **MM-CUL-4.**

***Operation***

Operations associated with whole site modernization projects would not demolish, physically alter, or otherwise diminish the historical integrity of a building or school complex qualifying as a historical resource under CEQA. No impact on a historical resource would occur.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-CUL-3**: **Potential to Cause a Substantial Adverse Change in the Significance of a Historical Resource through Demolition and Construction of Existing District Facilities.** Demolition and construction activities associated with whole site modernization projects could result in significant impacts on historical resources through demolition of existing buildings or complexes. Any demolition of a known or yet-to-be identified California Register of Historical Resources (CRHR)-eligible building or complex would constitute a significant impact on a historical resource. Some improvements to existing school complexes and known or yet-to-be identified CRHR-eligible school complexes and buildings could result in a significant impact on a historical resource.

**Impact-CUL-4**: **Potential to Cause Substantial Adverse Change in the Significance of a Historical Resource through Physical Alteration of Existing District Facilities**. Alterations of existing school buildings and complexes associated with whole site modernization projects or upgrades of existing school and administrative sites could result in significant impacts on historical resources. Depending on the degree and nature of such modifications planned for specific school buildings and complexes, impacts on historical resources could be less than significant in some cases. However, a significant impact on a historical resource would occur if any modifications diminished the historical integrity and eliminated character-defining features of a California Register of Historical Resources-eligible building or complex so as to result in substantial adverse change in the significance of a historical resource. In such instances, impacts would be significant.

#### *Operation*

There would be no impacts on historical resources related to operations associated with whole site modernization projects.

### Mitigation Measures

For **Impact-CUL-3** and **Impact-CUL-4**:

Implement **MM-CUL-1, MM-CUL-2, MM-CUL-3,** and **MM-CUL-4**, as described above.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-CUL-1** will provide for identification of historical resources that might be present at sites proposed for demolition as part of a whole site modernization project. This mitigation measure would also provide for analysis of potential impacts on historical resources that might be present at existing school sites that meet the threshold criteria for further analysis, as described above. By documenting the historical significance and character-defining features of historical resources meeting CRHR Criterion 3 to HABS/HAER/HALS archival photograph and written-data standards, **MM-CUL-2** would reduce impacts on such resources present at existing school properties subject to whole site modernization. Preparation of interpretive and/or educational media through implementation of **MM-CUL-3** in cases of historical resources meeting CRHR Criteria 1 and/or 2 would also reduce impacts on such resources present at existing school properties. Existing school sites in particular are more likely to have significance under CRHR

Criterion 3 than CRHR Criteria 1 or 2. However, it is possible that District school buildings or complexes could meet CRHR Criteria 1 or 2 while also meeting CRHR Criterion 3, or could meet all three criteria. Implemented in combination, **MM-CUL-2** and **MM-CUL-3** would reduce impacts on historical resources with significance under CRHR Criteria 1 or 2 and CRHR Criterion 3.

Based on the CRHR criterion met by the historic building or complex, **MM-CUL-2** and/or **MM-CUL-3** would be implemented in combination with **MM-CUL-1** to determine if any historical resources are present at existing school properties that have not recently been studied. If implementation of these mitigation measures results in project activities that diminish the integrity of a historical resource to a limited extent and eliminate only non-essential character-defining features, then, depending on which CRHR criterion is met, **MM-CUL-2** and/or **MM-CUL-3** could potentially reduce impacts to a less-than-significant level. In addition, **MM-CUL-4** could be implemented for buildings meeting any of the CRHR criteria to reduce impacts by retaining character-defining features and thereby maintaining the historic integrity of the structure. However, **MM-CUL-1**, **MM-CUL-2**, **MM-CUL-3,** and/or **MM-CUL-4** would not reduce impacts to a less-than-significant level in all potential scenarios. For example, if a whole site modernization project requires demolition of a historical resource, or requires that a historical resource be altered in ways that result in substantial adverse change in its significance, then impacts would remain significant. Therefore, **Impact-CUL-3** and **Impact-CUL-4** would remain significant and unavoidable after implementation of **MM-CUL-1** through **MM-CUL-4.**

#### *Operation*

There would be no impacts on historical resources related to operations associated with whole site modernization projects.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

This project category would include actions such as replacing doors and windows, altering exterior finishes, installing HVAC units and associated ducts, and undertaking ADA compliance upgrades, which have the potential to diminish the historical integrity of a CRHR-eligible building or complex of buildings, and eliminate character-defining features that express the significance of a CRHR-eligible building or complex. Landscaping and associated structures and objects within spaces between and in proximity to school buildings can contribute to the significance of a school complex qualifying as a historical resource. Consequently, ADA compliance upgrades, new ramps and stairs, and new fencing have the potential to reduce the historical integrity of a school complex qualifying as a historical resource.

These actions could be taken to upgrade, maintain, or repair buildings or complexes known to qualify as historical resources, and buildings and complexes over 45 years old that have not been evaluated for CRHR eligibility to determine if they qualify as historical resources. Therefore, as with whole site modernization activities, construction activities undertaken to upgrade existing school and administrative sites could result in a significant impact on a building or complex qualifying as a historical resource (**Impact-CUL-4)**.

Implementation of **MM-CUL-1** through **MM-CUL-4** would be required. **MM-CUL-1** will provide for identification of historical resources that might be present at District properties. This mitigation measure would also provide for analysis of potential impacts on historical resources that might occur during construction activities. By documenting the historical significance and character-defining features of historical resources meeting CRHR Criterion 3 to HABS/HAER/HALS archival photograph and written-data standards, **MM-CUL-2** would reduce impacts on such resources. Preparation of interpretive and/or educational media through implementation of **MM-CUL-3** in cases of historical resources meeting CRHR Criteria 1 and/or 2 would also reduce impacts on such resources present at one of the existing District properties.

**MM-CUL-2** and/or **MM-CUL-3** would be implemented in combination with **MM-CUL-1** to determine if any historical resources are present at the existing school sites. If implementation of these mitigation measures results in project activities that diminish the integrity of a historical resource to a limited extent and eliminate only non-essential character-defining features, then impacts would be reduced to a less-than-significant level. Preparation of interpretive and/or educational media through implementation of **MM-CUL-3** in cases of historical resources meeting CRHR Criteria 1 and/or 2 would also reduce impacts on such resources that would be altered by school site upgrades or major maintenance and repairs. In addition, **MM-CUL-4** could be implemented for buildings meeting any of the CRHR criteria to reduce impacts by retaining character-defining features and thereby maintaining the historic integrity of the structure. However, **MM-CUL-1**, **MM-CUL-2**, **MM-CUL-3,** and **MM-CUL-4** would not reduce impacts to a less-than-significant level in all potential scenarios. For example, if construction activities would require demolition of a historical resource, or require that a historical resource be altered in ways that result in substantial adverse change in its significance, then impacts would remain significant. Therefore, **Impact-CUL-4** would remain significant and unavoidable after implementation of **MM-CUL-1** through **MM-CUL-4.**

***Operation***

Operations associated with upgrades of existing school and administrative sites would not demolish, physically alter, or otherwise diminish the historical integrity of a building or school complex qualifying as a historical resource under CEQA. No impact on a historical resource would occur.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-CUL-4**: **Potential to Cause Substantial Adverse Change in the Significance of a Historical Resource through Physical Alteration of Existing District Facilities**. Alterations of existing school buildings and complexes associated with whole site modernization projects or upgrades of existing school and administrative sites could result in significant impacts on historical resources. Depending on the degree and nature of such modifications planned for specific school buildings and complexes, impacts on historical resources could be less than significant in some cases. However, a significant impact on a historical resource would occur if any modifications diminished the historical integrity and eliminated character-defining features of a California Register of Historical Resources-eligible building or complex so as to result in substantial adverse change in the significance of a historical resource. In such instances, impacts would be significant.

***Operation***

There would be no impacts on historical resources related to operations associated with upgrades of existing school and administrative sites.

### Mitigation Measures

For **Impact-CUL-4**:

Implement **MM-CUL-1, MM-CUL-2, MM-CUL-3,** and **MM-CUL-4**, as described above.

### Level of Significance After Mitigation

***Construction***

**MM-CUL-1** will provide for identification of historical resources that might be present at District properties. This mitigation measure would also provide for analysis of potential impacts on historical resources that might occur during construction activities. By documenting the historical significance and character-defining features of historical resources meeting CRHR Criterion 3 to HABS/HAER/HALS archival photograph and written-data standards, **MM-CUL-2** would reduce impacts on such resources. Preparation of interpretive and/or educational media through implementation of **MM-CUL-3** in cases of historical resources meeting CRHR Criteria 1 and/or 2 would also reduce impacts on such resources present at one of the existing District properties.

**MM-CUL-2** and/or **MM-CUL-3** would be implemented in combination with **MM-CUL-1** to determine if any historical resources are present at the existing school sites. If implementation of these mitigation measures results in project activities that diminish the integrity of a historical resource to a limited extent and eliminate only non-essential character-defining features, then impacts would be reduced to a less-than-significant level. Preparation of interpretive and/or educational media through implementation of **MM-CUL-3** in cases of historical resources meeting CRHR Criteria 1 and/or 2 would also reduce impacts on such resources that would be altered by school site upgrades or major maintenance and repairs. In addition, **MM-CUL-4** could be implemented for buildings meeting any of the CRHR criteria to reduce impacts by retaining character-defining features and thereby maintaining the historic integrity of the structure. However, **MM-CUL-1**, **MM-CUL-2**, **MM-CUL-3,** and **MM-CUL-4** would not reduce impacts to a less-than-significant level in all potential scenarios. For example, if construction activities would require demolition of a historical resource, or require that a historical resource be altered in ways that result in substantial adverse change in its significance, then impacts would remain significant. Therefore, **Impact-CUL-4** would remain significant and unavoidable after implementation of **MM-CUL-1** through **MM-CUL-4.**

***Operation***

There would be no impacts on historical resources related to operations associated with upgrades of existing school and administrative sites.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

The construction of new joint-use fields, pools, and facilities for the Play All Day Program would not entail demolition or alteration of any existing buildings at District school properties. In many cases, recreational spaces and facilities across District schools have been subject to alteration within the last 45–50 years. Such facilities are located in playground areas, not in spaces between school buildings that can contain landscaping and "hardscape" features such as planters, walkways, paved courtyards, benches, and other built features with potential to contribute to a significant school building or school complex. Recreational facilities located in playground areas do not contribute to any individual school buildings or school building complexes that have been found eligible for CRHR listing. This project category would not have any significant impacts on historical resources.

#### *Operation*

Operations of joint-use facilities would not demolish, physically alter, or otherwise diminish the historical integrity of a building or school complex qualifying as a historical resource under CEQA. No impact on a historical resource would occur.

### Level of Significance Prior to Mitigation

#### *Construction and Operation*

The development of joint-use facilities would occur within areas of existing school sites where recreational facilities are currently located. The existing structures and objects of those existing facilities are ubiquitous elements of school built environments that do not contribute to school buildings and complexes that qualify as historical resources. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction and Operation*

The development of joint-use facilities would occur within areas of existing school sites where recreational facilities are currently located. The existing structures and objects of those existing facilities are ubiquitous elements of school built environments that do not contribute to school buildings and complexes that qualify as historical resources. Impacts would be less than significant.

# Site-Specific Analysis

## Impact Discussion

### Construction

Construction activities that would be conducted for the 21 near-term, site-specific whole site modernization projects could include demolition of existing buildings or upgrades that would

physically alter existing buildings. As discussed in Section 4.4.2.2, all 21 of the proposed schools sites were evaluated. None of those 21 school complexes were found eligible for CRHR listing. Additionally, no buildings at those 21 school complexes were found individually eligible for CRHR listing. Consequently, planned construction activities involving these 21 school properties would not result in impacts on a historical resource.

#### Operation

Operations of the 21 near-term, site-specific whole site modernization projects would not demolish, physically alter, or otherwise diminish the historical integrity of a building or school complex qualifying has a historical resource under CEQA. No impact on a historical resource would occur.

### Level of Significance Prior to Mitigation

No historical resources are present at schools undergoing site-specific analysis for whole site modernization in this PEIR. No impact would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

No impact on a historical resource would occur.

***Threshold 2: Would the Proposed Program cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

At new school and administrative sites, construction activities could require demolition of existing buildings and construction of new buildings and other facilities, which would include varying depths of excavation and ground disturbance. Because the exact location of these new sites is unknown at this time, the presence or absence of archaeological resources cannot be determined.

Therefore, ground-disturbing activities could result in the discovery of previously unidentified archaeological resources and the destruction of known archaeological resources, which would be a significant impact (**Impact-CUL-5**). With the implementation of mitigation measures **MM-CUL-5** and **MM-CUL-6**, **Impact-CUL-5** would be reduced to a less-than-significant level because the archaeological sensitivity analysis would identify the potential for encountering archaeological resources during ground-disturbing activities, and the recommendations and the measures included in **MM-CUL-6** would minimize potential damage or loss of subsurface archaeological resources.

***Operation***

Operation of District facilities subject to the Proposed Program would not involve ground disturbance and therefore would not damage or destroy an archaeological resource. No impact on an archaeological resource would occur.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-CUL-5**: **Disturbance and/or Destruction of Previously Recorded and/or Undiscovered Archaeological Resources During Construction Related to New Acquisition and New School or Administrative Facilities.** Ground-disturbing activities associated with new school or administrative facilities could result in damage or destruction of archaeological resources. This would constitute a significant impact on an archaeological resource.

***Operation***

There would be no impacts on archaeological resources related to operation of new school or administrative facilities.

### Mitigation Measures

For **Impact-CUL-5**:

**MM-CUL-5**: **Prepare an Archaeological Sensitivity Analysis**. An archaeological sensitivity analysis shall be prepared during project-specific CEQA analyses for a project that involves ground disturbance or excavation at new school or administrative sites, or at the 164 existing sites with unknown archaeological sensitivity.

The archaeological sensitivity analysis shall include:

- Obtaining a record search at South Coastal Information Center (SCIC) that includes the school property and at minimum a quarter-mile buffer.
- Obtaining a Sacred Lands file search from the Native American Heritage Commission (NAHC).
- Reviewing available historic maps, historic aerials, Sanborn fire insurance maps, small-scale plot plans, and geotechnical investigation reports of the school property.

A cultural resources memo shall be prepared summarizing the results of the record search and background research and illustrating the history of development and disturbances at the school property. The memo shall discuss the potential for historic and prehistoric archeological resources to be present at the school property. Additionally, the memo shall identify potential impacts and provide recommendations.

The cultural resources archaeological recommendations shall be valid for 5 years after the date of the record search. After 5 years, the District shall retain an archaeologist who shall acquire an updated record search from the SCIC and review the cultural resources memo recommendations.

For District properties, where only a record search and/or a site visit have already been conducted prior to this PEIR, the District shall retain an archaeologist to:

- Review record search results, site visit results, and any recommendations.
- If the record search is older than 5 years, obtain an updated record search from the SCIC.
- Review available historic maps, historic aerials, Sanborn fire insurance maps, small-scale plot plans, and geotechnical investigation reports of the school property.
- Prepare a cultural resources memo with existing or updated record search results; a summary of background research of historic maps, aerials, etc.; and potential for historic and prehistoric archeological resources to be present at the school property. Additionally, the memo shall identify potential impacts and provide recommendations.

The District will review these findings and make a determination regarding the significance of project-level impacts prior to approval of any project.

**MM-CUL-6: Conduct Archaeological Monitoring.** Where the above analysis (**MM-CUL-5**) indicates that a project could result in significant impacts on archaeological resources, archaeological monitoring shall be required during construction activities. Specifically, the District shall require and it or its construction supervisor shall ensure the following measures are implemented:

- Initial grading and/or excavating shall be monitored by a qualified archaeologist who is supervised by a Lead Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards, as outlined in 36 Code of Federal Regulations (CFR) 61.
- The Lead Archaeologist shall participate in a preconstruction meeting to inform all personnel of the potential to encounter archaeological materials during construction.
- If the archaeological monitor, through observation and professional judgment, determines that a particular location is not archaeologically sensitive because of lack of native soil or previous disturbance, the archaeological monitor may reduce or curtail monitoring efforts in that location.
- Monitoring efforts may be reduced if some of the areas with potential for culturally sensitive materials are determined to have a low potential to contain cultural resources upon exposure and examination by the qualified archaeological monitor.
- If an artifact is discovered that requires collection, the archaeological monitor shall have the authority to temporarily halt construction activities in the immediate area of the find, and be given sufficient time to recover the item(s) and map its location with a global positioning system (GPS) device.
- In the event that cultural materials (e.g., bone, chipped stone, ground stone, shell, glass, ceramics, metal) are located below surface during the construction of a project, work shall be halted in that area so that the significance of the find can be determined by the Lead Archaeologist, and, if necessary, appropriate treatment measures can be developed in consultation with the District. Treatment measures typically include development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs, such as excavation or detailed documentation, following standard archaeological procedures.
- Recovered items shall be treated in accordance with current professional standards by being properly provenienced, cleaned, analyzed, researched, reported, and curated in

a collection facility meeting the SOI's Standards, as promulgated in 36 CFR 79, such as the San Diego Archaeological Center.

- A monitoring report shall be prepared by the Lead Archaeologist and submitted to the District for review and approval. The report shall discuss the monitoring methods and results, and provide interpretations about any recovered materials or sites identified, if any. The final report shall be submitted to the District and the South Coastal Information Center.

### Level of Significance After Mitigation

#### *Construction*

With the implementation of mitigation measures **MM-CUL-5** and **MM-CUL-6**, **Impact-CUL-5** would be reduced to a less-than-significant level because the archaeological sensitivity analysis would identify the potential for encountering archaeological resources during ground-disturbing activities, and the recommendations and the measures included in **MM-CUL-6** would minimize potential damage or loss of subsurface archaeological resources.

#### *Operation*

There would be no impacts on archaeological resources related to operation of a new school or administrative facility.

## Whole Site Modernization; Upgrades of Existing School and Administrative Sites; Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

At existing school and administrative sites undergoing a whole site modernization, construction activities could require demolition of existing buildings and construction of new buildings, which would include varying depths of excavation and ground disturbance. Additionally, the construction of new joint-use fields, pools, and facilities for the Play All Day Program would also involve excavation. Upgrades of existing school and administrative sites would include limited ground disturbance.

Excavation and other ground-disturbing activities could result in the discovery of previously unidentified archaeological resources in areas of sensitivity, and the destruction of known archaeological resources if they are present within the excavation area. As discussed in Section 4.4.2.2, Table 4.4-2 identifies the 62 existing school sites that have undergone a comprehensive archaeological sensitivity analysis. Of those 62 sites, 10 have prehistoric and/or historic archaeological sensitivity. In addition, the remaining 164 existing school sites have unknown archaeological sensitivity.

If ground-disturbing activities were to occur at those 174 existing school sites with known or unknown archaeological sensitivity, known or previously unidentified archaeological resources could be damaged or destroyed. Impacts associated with the damage or destruction of an archaeological resource during construction activities (e.g., building demolition, grading) are considered to be potentially significant (**Impact-CUL-6**).

With the implementation of mitigation measures **MM-CUL-5** and **MM-CUL-6**, **Impact-CUL-6** would be reduced to a less-than-significant level because the archaeological sensitivity analysis would identify the potential for encountering archaeological resources during ground-disturbing activities and the recommendations and the measures included in **MM-CUL-6** would minimize potential damage or loss of subsurface archaeological resources.

***Operation***

Operation of District facilities subject to the Proposed Program would not involve ground disturbance and therefore would not damage or destroy an archaeological resource. No impact on an archaeological resource would occur.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-CUL-6: Disturbance and/or Destruction of Previously Recorded and/or Undiscovered Archaeological Resources.** Ground-disturbing activities at existing school sites associated with implementation of the Proposed Program could result in damage or destruction of archaeological resources and would constitute a significant impact on an archaeological resource.

***Operation***

There would be no impacts on archaeological resources related to operation of a whole site modernization project, upgrades of existing school and administrative sites, or joint-use facilities.

### Mitigation Measures

For **Impact CUL-6:**

Implement **MM-CUL-5** and **MM-CUL-6**, as described above.

### Level of Significance After Mitigation

***Construction***

With the implementation of mitigation measures **MM-CUL-5** and **MM-CUL-6**, **Impact-CUL-6** would be reduced to a less-than-significant level because the archaeological sensitivity analysis would identify the potential for encountering archaeological resources during ground-disturbing activities, and the recommendations and the measures included in **MM-CUL-6** would minimize potential damage or loss of subsurface archaeological resources.

***Operation***

There would be no impacts on archaeological resources related to operation of a whole site modernization project, upgrades of existing school and administrative facilities, or joint-use facilities.

# Site-Specific Analysis

## Impact Discussion

### Construction

Construction activities that would be conducted for the 21 near-term, site-specific whole site modernization projects could include demolition of existing buildings or construction of new buildings and other facilities that would result in ground-disturbing activities. As discussed in Section 4.4.2.2, all 21 of the proposed schools sites were evaluated for archaeological sensitivity. Archaeologically sensitive schools sites are those sites that could contain potentially significant prehistoric or historic subsurface cultural deposits based on analysis of SCIC record search results and historic map and aerial research. Analysis of the 21 school sites indicates that two schools (Crown Point Junior Music Academy and Barnard Asian Pacific Language Academy) have archaeological sensitivity; specifically, prehistoric archaeological resources have been recorded as intersecting with the school boundaries. The cultural resources memos of those 21 schools can be referenced in Appendix F.

Therefore, ground-disturbing activities associated with construction at Crown Point Junior Music Academy and Barnard Asian Pacific Language Academy could result in damage or destruction of significant archaeological resources (**Impact-CUL-7**). After implementation of mitigation measure **MM-CUL-6, Impact-CUL-7** would be reduced to a less-than-significant level because the recommended monitoring of ground-disturbing activities would minimize potential damage or loss of subsurface archaeological resources.

### Operation

Operations of the 21 near-term, site-specific whole site modernization projects would not involve ground disturbance and therefore would not damage or destroy an archaeological resource. No impact on an archaeological resource would occur.

## Level of Significance Prior to Mitigation

### Construction

Implementation of the site-specific projects at Crown Point Junior Music Academy and Bernard Asian Pacific Language Academy would result in potentially significant impacts. No significant impacts on archaeological resources are anticipated at the other 19 near-term, site-specific whole site modernization school sites determined to have low archaeological sensitivity.

**Impact-CUL-7**: **Disturbance and/or Destruction of Significant Archaeological Resources.** Implementation of future construction activities at Crown Point Junior Music Academy and Barnard Asian Pacific Language Academy would result in potentially significant impacts on archaeological resources.

### Operation

Operations of the 21 near-term, site-specific whole site modernization projects would not involve ground disturbance and therefore would not damage or destroy an archaeological resource. No impact on an archaeological resource would occur.

### Mitigation Measures

For **Impact-CUL-7:**

Implement **MM-CUL-6,** as described above, at Crown Point Junior Music Academy and Bernard Asian Pacific Language Academy.

### Level of Significance After Mitigation

#### Construction

After implementation of **MM-CUL-6, Impact-CUL-7** would be reduced to a less-than-significant level because the recommended monitoring of ground-disturbing activities would minimize potential damage or loss of subsurface archaeological resources.

#### Operation

Operations of the 21 near-term, site-specific whole site modernization projects would not involve ground disturbance and therefore would not damage or destroy an archaeological resource. No impact on an archaeological resource would occur.

## *Threshold 3: Would the Proposed Program disturb any human remains, including those interred outside of dedicated cemeteries?*

## Program-Level Analysis

### All Project Categories

#### Impact Discussion

##### *Construction*

The Proposed Program would potentially include the construction of new schools at new sites, including charters and associated administrative facilities, and major reconstruction of existing schools. As with new school development and school reconstruction, Proposed Program categories such as whole site modernization, upgrades of existing school and administrative sites, and development of joint use facilities such as fields and pools, would all require excavation and other ground disturbances. At both archaeologically sensitive existing school sites and new sites, and at existing and new school sites without archaeological sensitivity, ground disturbances associated with the Proposed Program could expose buried human remains, if any are present. Therefore, foreseeable development associated with the Proposed Program has the potential to disturb human remains, including those interred outside of formal cemeteries.

However, California Health and Safety Code Section 7050.5 states that in the event of discovery of human remains during ground disturbances, no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined by the coroner to be Native American, the Coroner is responsible for contacting the NAHC within 24 hours. NAHC, pursuant to Section 5097.98, will immediately notify those persons it believes to be the Most Likely Descendent (MLD) from the deceased person so they can inspect the burial site and make

recommendations for treatment or disposal. The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Impacts associated with the disturbance of human remains would be less than significant as a result of compliance with the existing laws and regulations for appropriate handling of any human remains that are encountered.

***Operation***

Operations of District facilities subject to the Proposed Program would not require any construction activities involving excavation or other ground disturbances. No impact on human remains would occur.

### Level of Significance Prior to Mitigation

***Construction***

Construction-related elements of the Proposed Program have the potential to disturb human remains, including those interred outside of formal cemeteries. Potentially significant impact(s) include damage to or destruction of human remains. If human remains are discovered, work must halt in that area and the procedures as set forth in PRC Section 5097.98 and State Health and Safety Code Section 7050.5 must be undertaken. Therefore, because regulations are present that ensure disturbances to human remains are minimized, the Proposed Program impacts on human remains would be less than significant.

***Operation***

Operations of District facilities subject to the Proposed Program would not require any activities involving excavation or other ground disturbances. No impact on human remains would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

***Construction***

Compliance with the procedures as set forth in PRC Section 5097.98 and State Health and Safety Code Section 7050.5 would ensure impacts associated with the Proposed Program are less than significant.

***Operation***

Operations of District facilities subject to the Proposed Program would not require any activities involving excavation or other ground disturbances. No impact on human remains would occur.

# Site-Specific Analysis

## Impact Discussion

### Construction

Ground-disturbing activities associated with the whole site modernization projects at the 21 near-term sites have the potential to disturb human remains, including those interred outside of formal cemeteries, and could result in damage or destruction of human remains. If human remains are discovered at any of the 21 schools sites, work must halt in that area and the procedures as set forth in PRC Section 5097.98 and State Health and Safety Code Section 7050.5 must be undertaken. Any potential impacts on human remains would thereby be reduced to a less-than-significant level.

### Operation

Operations at the 21 school sites would not require excavation or other ground-disturbing activities. No impact on human remains would occur as a result of operation.

## Level of Significance Prior to Mitigation

Site-specific construction-related elements of whole site modernization have potential to disturb human remains, including those interred outside of formal cemeteries. Potentially significant impact(s) include damage to or destruction of human remains. If human remains are discovered, work must halt in that area and the procedures as set forth in PRC Section 5097.98 and State Health and Safety Code Section 7050.5 must be undertaken. Impacts on human remains would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

### Construction

Compliance with the procedures as set forth in PRC Section 5097.98 and State Health and Safety Code Section 7050.5 will reduce impacts to less than significant.

### Operation

Operations at the 21 school sites would not require excavation or other ground-disturbing activities. No impact on human remains would occur as a result of operation.

# Section 4.5
# Energy

## 4.5.1 Overview

This section describes the existing setting for energy and the applicable regulations that govern energy use, supply and distribution, and performance. This section also discusses the Proposed Program's potential to result in impacts associated with energy use.

Impacts related to energy would be significant if the Proposed Program were to (1) result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or (2) conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Table 4.5-1 summarizes the significant impacts and mitigation measures (MMs) discussed in Section 4.5.4.3, *Impacts and Mitigation Measures*.

**Table 4.5-1. Summary of Significant Energy Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact-EN-1:** Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of New School or Administrative Facilities. | **MM-GHG-1:** Implement Best Management Practices During Construction. | Less than Significant | Mitigation would require the incorporation of best management practices to reduce greenhouse gas (GHG) emissions from off-road construction equipment and emissions from the waste and mobile sectors. |
| **Impact-EN-5:** Inconsistency with District Environmental Sustainability Goals. | **MM-GHG-2:** Incorporate Sustainable Design Features. | Less than Significant | Mitigation would require implementation of sustainable design features, which would ensure that the Proposed Program is consistent with the goals set forth in the District's *Dream Big* initiative, and with |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | the energy-reducing design features proposed by the District per its design guidelines and Collaborative for High Performance Schools (CHPS) criteria. |
| **Whole Site Modernization** | | | |
| **Impact-EN-2:** Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Whole Site Modernization Projects. | **MM-GHG-1:** Implement Best Management Practices During Construction. | Less than Significant | Mitigation would require the incorporation of best management practices to reduce GHG emissions from off-road construction equipment and emissions from the waste and mobile sectors. |
| **Impact-EN-5:** Inconsistency with District Environmental Sustainability Goals. | **MM-GHG-2:** Incorporate Sustainable Design Features. | Less than Significant | Mitigation would require implementation of sustainable design features, which would ensure that the Proposed Program is consistent with the goals set forth in the District's *Dream Big* initiative, and with the energy-reducing design features proposed by the District per its design guidelines and CHPS criteria. |
| **Upgrades of Existing School and Administrative Sites** | | | |
| **Impact-EN-3:** Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Upgrades of Existing School and Administrative Sites. | **MM-GHG-1:** Implement Best Management Practices During Construction. | Less than Significant | Mitigation would require the incorporation of best management practices to reduce GHG emissions from off-road construction equipment and |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | emissions from the waste and mobile sectors. |
| **Impact-EN-5:** Inconsistency with District Environmental Sustainability Goals. | **MM-GHG-2:** Incorporate Sustainable Design Features. | Less than Significant | Mitigation would require implementation of sustainable design features, which would ensure that the Proposed Program is consistent with the goals set forth in the District's *Dream Big* initiative, and with the energy-reducing design features proposed by the District per its design guidelines and CHPS criteria. |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| **Impact-EN-4:** Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Joint-Use Facilities. | **MM-GHG-1:** Implement Best Management Practices During Construction. | Less than Significant | Mitigation would require the incorporation of best management practices to reduce GHG emissions from off-road construction equipment and emissions from the waste and mobile sectors. |
| **Impact-EN-5:** Inconsistency with District Environmental Sustainability Goals. | **MM-GHG-2:** Incorporate Sustainable Design Features. | Less than Significant | Mitigation would require implementation of sustainable design features, which would ensure that the Proposed Program is consistent with the goals set forth in the District's *Dream Big* initiative, and with the energy-reducing design features proposed by the District per its design |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | guidelines and CHPS criteria. |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| **Impact-EN-2:** Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Whole Site Modernization Projects. | **MM-GHG-1:** Implement Best Management Practices During Construction. | Less than Significant | Mitigation would require the incorporation of best management practices to reduce GHG emissions from off-road construction equipment and emissions from the waste and mobile sectors. |
| **Impact-EN-5:** Inconsistency with District Environmental Sustainability Goals. | **MM-GHG-2:** Incorporate Sustainable Design Features. | Less than Significant | Mitigation would require implementation of sustainable design features, which would ensure that the Proposed Program is consistent with the goals set forth in the District's *Dream Big* initiative, and with the energy-reducing design features proposed by the District per its design guidelines and CHPS criteria. |

## 4.5.2 Existing Conditions

Energy use includes direct and indirect consumption of energy, including electricity and natural gas, and fuel associated with transportation-related energy, during project construction and operation. San Diego Gas and Electric (SDG&E) provides electricity and natural gas to the District facilities.

### 4.5.2.1 State Energy Resources and Use

California has a diverse portfolio of resources that produced 2,535.8 trillion British thermal units (BTUs) [1] of energy in 2017 (U.S. Energy Information Administration 2017a).[2] Excluding offshore areas, the state ranked third in the nation in crude oil production in 2016, producing the equivalent of 1,064.7 trillion BTUs of energy. The state also ranked first in the nation for energy production from renewable resources. Other energy sources in the state include natural gas (234.7 trillion BTUs), nuclear (197.8 trillion BTUs), and biofuels (30 trillion BTUs) (U.S. Energy Information Administration 2017a).[3]

According to the U.S. Energy Information Administration, California consumed approximately 7,881 trillion BTUs of energy in 2017. Per capita energy consumption (i.e., total energy consumption divided by the population) in California is among the lowest in the country, with 200 million BTU in 2017, which ranked 48th among all states. Natural gas accounted for the majority of energy consumption (28%); followed by motor gasoline (22%); renewable energy, including nuclear electric power, hydroelectric power, biomass, and other renewables (18%); distillate and jet fuel (16%); and interstate electricity (8%); with the remaining 8% coming from a variety of other sources (U.S. Energy Information Administration 2017b). The transportation sector consumed the highest quantity of energy (40%), followed by the industrial (23%), commercial (19%), and residential (18%) sectors (U.S. Energy Information Administration 2017b).

Per capita energy consumption, in general, is declining due to improvements in energy efficiency and design. However, despite this reduction in per capita energy use, the state's total overall energy consumption (i.e., non-per capita energy consumption) is expected to increase over the next several decades due to growth in population, jobs, and vehicle travel.

### 4.5.2.2 Regional Energy Resources and Use

SDG&E provides energy service to over 3.6 million customers (i.e., 1.4 million accounts) in San Diego County and portions of southern Orange County. The utility has a diverse power production portfolio, composed of a variety of renewable and non-renewable sources. Energy production typically varies by season and by year. Regional electricity loads also tend to be higher in the summer because higher summer temperatures drive increased demand for air-conditioning. In contrast, natural gas loads are higher in the winter because colder temperatures drive increased demand for natural gas heating.

In 2018, 43% of the electricity SDG&E supplied was from renewable sources, compared to less than 1% in 2002 (CEC 2019).[4] Table 4.5-2 outlines the SDG&E power mix compared to the power mix for the state in 2017 and 2018 (CEC 2019). In 2018, SDG&E customers used 21,157 gigawatt hours of electricity and 482 million therms of natural gas (CEC 2019). Table 4.5-3 outlines the breakdown of

[1] One BTU is the amount of energy required to heat 1 pound of water by 1°F at sea level. BTU is a standard unit of energy that is used in the United States and is on the English system of units (foot-pound-second system).

[2] Note that 2017 data are the most recent available.

[3] No coal production occurs in California; however, imported coal made up approximately 4% of California's energy mix as of 2017. SDG&E, the energy provider for the San Diego region, does not have any coal in its energy mix as of 2017 (CEC 2019).

[4] 2018 is the most recent year for which California Renewables Portfolio Standard data is available.

electricity and natural gas usage by sector in the SDG&E service area. Residential and commercial uses account for 89% of electricity use and 94% of natural gas use within the SDG&E service area.

**Table 4.5-2. SDG&E and the State of California Power Mix in 2017 and 2018**

| Energy Resources | SDG&E Power Mix (%) | | California-Wide Power Mix (%) | |
|---|---|---|---|---|
| | 2017 | 2018 | 2017 | 2018 |
| Eligible Renewables | 44 | 43 | 29 | 31 |
| *Biomass and Waste* | *2* | *2* | *2* | *2* |
| *Geothermal* | *0* | *0* | *4* | *5* |
| *Small Hydroelectric* | *0* | *0* | *3* | *2* |
| *Solar* | *21* | *20* | *10* | *11* |
| *Wind* | *21* | *21* | *10* | *12* |
| Coal | 0 | 0 | 4 | 3 |
| Large Hydroelectric | 0 | 0 | 15 | 11 |
| Natural Gas | 39 | 29 | 34 | 35 |
| Nuclear | 0 | 0 | 9 | 9 |
| Other | 0 | <1 | <1 | <1 |
| Unspecified Sources of Power[1] | 17 | 27 | 9 | 11 |
| **Total** | **100** | **100** | **100** | **100** |

Source: CEC 2018. CEC 2019.

[1] Electricity from transactions that are not traceable to specific generation sources.

**Table 4.5-3. Electricity and Natural Consumption in the SDG&E Service Area in 2018**

| Energy Resources | Electricity (GWh) | Natural Gas (million therms) |
|---|---|---|
| Agriculture and Water Pump | 334 | 4 |
| Commercial | 1,324 | 191 |
| Industry | 1,239 | 21 |
| Mining and Construction | 427 | 4 |
| Residential | 6,359 | 265 |
| Streetlight | 87 | -- |
| **Total** | **18,767** | **483** |

Source: CEC 2020a, CEC 2020b.

GWh = gigawatt hours

## 4.5.2.3 Local Energy Resources and Use

Current energy use at District facilities includes building electricity and natural gas consumption for space and water heating. While the majority of electricity is supplied by SDG&E, a portion of District electricity needs are satisfied through onsite solar production. District energy consumption for three recent fiscal years (2016/2017–2018/2019) is provided in Table 4.5-4. As shown, approximately 11% of electricity consumption is produced on site through use of solar panels.

**Table 4.5-4. Electricity and Natural Consumption in the District**

| Energy Source | 2018–2019 | 2017–2018 | 2016–2017 |
|---|---|---|---|
| Electricity (MWh) | | | |
| Purchased (SDG&E) | 59,987 | 56,915 | 59,054 |
| Solar-Generated | 7,627 | 6,898 | 7,271 |
| *Total* | *67,614* | *63,814* | *66,325* |
| Natural Gas (therms) | 883,986 | 668,196 | 895,710 |

Source: Garcia-Craivanu pers. comm.
MWh = megawatt hours

# 4.5.3 Applicable Laws and Regulations

## 4.5.3.1 State

### Clean Energy and Pollution Reduction Act of 2015

Senate Bill (SB) 350 (De Leon, also known as the "Clean Energy and Pollution Reduction Act of 2015") was approved by the California legislature in September 2015 and signed by Governor Brown in October 2015. Its key provisions are to require the following by 2030: (1) a Renewables Portfolio Standard (RPS) of 50% and (2) a doubling of efficiency for existing buildings.

### Energy Building Regulations and Energy Conservation Standards

New buildings constructed in California must comply with the standards contained in California Code of Regulations (CCR) Title 20, Energy Building Regulations, and Title 24, Energy Conservation Standards. Title 20 contains standards ranging from power plant procedures and siting to energy efficiency standards for appliances to ensuring reliable energy sources are provided and diversified through energy efficiency and renewable energy resources.

Energy Conservation Standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission in June 1977 and most recently revised in 2008 (24 CCR 6). Title 24 requires the design of building shells and building components that conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code (24 CCR). Part 11 establishes voluntary standards that became mandatory in the 2010 edition of the code, including planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.

### California Energy Code

Title 24, Part 6 of the CCR describes California's energy efficiency standards for residential and nonresidential buildings. These standards were established in 1978 in response to a legislative

mandate to reduce California's energy consumption, and have been updated periodically to include new energy efficiency technologies and methods. The California Energy Code requires compliance with energy efficient standards for all new construction, including new buildings, additions, alterations, and, in nonresidential buildings, repairs.

## California Energy Efficiency Standards for Residential and Nonresidential Buildings—Green Building Code (2011), Title 24 Updates (2013, 2015)

The Green Building Standards Code (CALGreen) applies to the planning, design, operation, construction, use, and occupancy of newly constructed buildings and requires the installation of energy- and water-efficient indoor infrastructure for all new projects permitted after January 1, 2011. CALGreen also requires newly constructed buildings to develop a waste management plan and divert at least 50% of the construction materials generated during project construction.

Administrative regulations to CALGreen Part 11 and the California Building Energy Efficiency Standards were adopted in 2013 and took effect on January 1, 2014. The 2013 Building Energy Efficiency Standards are 30% more efficient than previous standards for commercial construction. Part 11 also established voluntary standards that became mandatory in the 2010 edition of the code, including planning and design for sustainable site development, energy efficiency, water conservation, material conservation, and internal air contaminants.

The 2016 Building Energy Efficiency Standards were adopted in 2015 and took effect on January 1, 2017. The 2019 standards, which took effect January 1, 2020, take the final step toward achieving zero net energy for newly constructed residential buildings throughout California with requirements such as solar voltaic systems for new homes and encouraging demand responsive technologies (e.g., battery storage, heat pump water heaters) to improve energy savings. The CEC estimates that the current 2019 standards will result in approximately 30% less energy from nonresidential buildings than those designed in compliance with the 2016 standards. These energy savings are due primarily to the required lighting upgrades with the current standards. Future standards are expected to require zero net energy for newly constructed commercial buildings.

## California Renewable Resources Act and the Clean Energy and Pollution Reduction Act of 2015

SB X1-2 (also known as the California Renewable Resources Act) was signed by Governor Brown in April 2011 and revised California's RPS to a goal of 33% by 2020. As noted above, SB 350 increased the renewable procurement goal to 50% by 2030 and also requires the state to double energy efficiency savings. SB 100 (discussed below) increased the RPS goal to 60% by 2030 and includes a 100% zero-carbon goal by 2045, as discussed below.

## Climate Change Scoping Plan of 2017

Executive Order (EO) B-30-15 and SB 32 extended the goals of Assembly Bill (AB) 32 and set a 2030 goal of reducing emissions 40% from 2020 levels. The 2017 Scoping Plan established a proposed framework to implement programs to meet the 2030 greenhouse gas (GHG) reduction goal, focusing on zero and near-zero technologies for moving freight, continuing investment in renewables, and overseeing further efforts to create walkable communities with expanded mass transit and other alternatives to traveling by car. These measures are provided in the Scoping Plan with the expressed intention of reducing carbon emissions; however, there would be a co-benefit of reduced energy use.

### The 100 Percent Clean Energy Act of 2018

SB 100 builds on SB 350 by increasing the renewable procurement target set in SB 350 to 60% by 2030 and requires 100% zero-carbon energy production and consumption by 2045.

## 4.5.3.2 Local

### San Diego Association of Governments

San Diego Association of Governments' (SANDAG's) San Diego Forward: The Regional Plan, which incorporates the 2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), was adopted in 2015 and provides a planned vision for the region's transportation system through 2050. The plan also incorporates a sustainable communities strategy as required by SB 375, which includes implementation of a Transportation Demand Management (TDM) strategy to help local governments reduce energy consumption.

SANDAG's Energy and Climate Change program supports local efforts to reduce GHG emissions in alignment with statewide goals to prepare for the impacts of climate change. Projects include climate action planning and energy engineering services for local jurisdictions, electric vehicle charging, and climate adaptation (SANDAG 2020).

Through its Energy Roadmap Program, SANDAG provides energy efficiency and engineering support to qualifying local jurisdictions (i.e., cities), which includes free energy assessments and energy management plans, or "Energy Roadmaps," to SANDAG member agencies that do not have Local Government Partnerships with SDG&E.

In July 2015, SANDAG launched Plug-in San Diego through a 2-year CEC grant. Plug-in San Diego implemented recommendations from SANDAG's Electric Vehicle (EV) Readiness Plan through a combination of resource development, training, technical assistance through an EV Expert, and outreach. SANDAG has provided various reports and documents to assist property owners in acquiring EV charging infrastructure and better understanding the technologies, incentives, and installation options available.

#### SANDAG Regional Energy Strategy

SANDAG's Regional Energy Strategy (RES) will serve as an energy policy blueprint for the region through 2050. The 2014 RES establishes long-term goals in 11 topic areas, including energy efficiency, renewable energy, distributed generation, transportation fuels, land use and transportation planning, border energy issues, and the green economy. Priority early actions of the RES include the following.

1. Pursue a comprehensive building retrofit program to improve efficiency and install renewable energy systems.
2. Create financing programs to pay for projects and improvements that save energy.
3. Use the SANDAG-SDG&E Local Government Partnership to help local governments identify opportunities and implement energy savings, both at government facilities and throughout the communities.
4. Support land use and transportation planning strategies that reduce energy use and GHG emissions.

5. Support planning for electric-charging and alternative-fuel infrastructure.
6. Support the use of existing unused reclaimed water to decrease the amount of energy needed to meet the water needs of the San Diego region.

In the RES, SANDAG acknowledges the state's "preferred loading order" for meeting the goals pertaining to the state's growing electricity demand. The preferred loading order is as follows:

1. Increase energy efficiency.
2. Increase demand response (e.g., through a temporary reduction or shift in energy use during peak hours).
3. Meet generation needs with renewable and distributed generation resources.
4. Meet new generation needs with clean fossil-fueled generation and infrastructure improvements.

The RES contains a suite of goals as well as measures for achieving the goals. For example, the RES includes an energy efficiency and conservation goal for reducing per capita electricity consumption by 20% by 2030 to compensate for population growth. Other regional goals are associated with developing renewable energy, encouraging distributed generation, reducing water consumption and diversifying water sources, reducing peak demand, relying on smart energy, replacing inefficient power plants, supporting alternative fuels for transportation, and ensuring appropriate land use planning, among others. To accomplish the goals, SANDAG recommends various measures, which local jurisdictions can implement to achieve the goals of the RES, including pursuing a comprehensive building retrofit program and identifying, securing, or developing funding mechanisms to pay for energy-related projects and programs. The RES will be updated periodically to reflect progress toward the RES goals, account for changes in energy and climate change policy, and make recommendations for continued progress.

## City of San Diego Climate Action Plan

The City of San Diego's Climate Action Plan (CAP), adopted in 2015, and CAP Checklist are used to demonstrate consistency with the City's Energy Goals and identify steps to achieve the 2035 targets (City of San Diego 2020). The CAP identifies strategies that are anticipated to reduce energy demand including creating a renewable energy program; implementing a zero waste plan; and changing policy to have a majority of the City's fleet be electric vehicles.

## San Diego Unified School District

The District formed the Environmental Sustainability Committee (ESAC) in 2013 to discuss a range of environmental sustainability activities, projects, and policies for consideration. The ESAC has generated various climate change–related "Dream Big" Ideas. These non-binding initiatives include developing a CAP, developing enough solar capabilities to go "off-grid" by 2025, adopting net-zero energy by 2030, incorporating LED lighting, maximizing water conservation, buying locally sourced produce and food, adopting net-zero waste, and supporting school gardens. The District has also expressed its intent to incorporate sustainable design and renewable energy into site design and to address transportation sustainability through the replacement of the aging school bus fleet (District 2014).

The District has prepared several documents to guide its sustainability goals. The District's *Solar PV Design Guide* outlines the District's objective to install solar photovoltaic systems at school campuses throughout the District to generate electricity. The District aims to produce enough solar electrical energy to offset site electrical consumption, thereby reducing electrical energy costs, reducing the District's environmental impact, and providing a hedge against future utility rate inflation and shifts. The District's current goal is to produce enough solar energy onsite to offset 90% of site-wide consumption. The *Solar PV Design Guide* provides direction on future solar projects (District 2017). In addition, the District's *Standards for New Construction, Additions, and Remodels* includes guidelines for site improvements and landscaping. These standards include design features that would assist the school in reducing its energy consumption, waste production, and water consumption. These design features include implementing xeriscaping practices and plantings consistent with local climate conditions to reduce plant waste and energy costs (District 2016). The District's *Educational Specifications* also reinforces the District's goals for sustainability as it relates to renewable energy and recycled materials.

Further, the District has adopted the use of the Collaborative for High Performance Schools (CHPS) criteria to be used in designing, building, renovating and operating schools in the District (District 2003). This includes implementing principles that foster well-designed, operated, and maintained educational facilities; conserving energy, water, and other natural resources; and reducing waste, pollution, and environmental degradation (CHPS 2019). CHPS criteria have been incorporated into the District's *Architect's Professional Services Manual,* which requires designers to be consistent with the District's design guide (District 2019a). Requirements in the *Architect's Professional Services Manual* related to energy include energy efficiency (superior energy performance; commissioning, energy management systems, refrigerant management), water efficiency (landscape, interior, process use, water management systems), and construction waste recycling.

## District Administrative Regulation 3511(a)

District Administrative Regulation (AR) 3511 outlines the operational energy and water management policies for District facilities to reduce water and energy resource use. Specifically, the following district operational policies related to lighting are incorporated into the district's resource management program:

a. All unnecessary lighting in unoccupied areas will be turned off even when lighting motion sensors are in place. Staff should make certain that lights are turned off when leaving the classroom or office when exiting the classroom or office. Use only natural lighting where sufficient.

b. All outside lighting shall be off during daylight hours.

c. Gym lights, stage and multipurpose rooms shall not be left on unless the space is being occupied.

d. All lights shall be turned off when students and staff leave for the day. Custodians will turn on lights only in the areas in which they are working.

e. Refrain from turning lights on unless needed. Remember that lights not only consume electricity, but also give off heat that places an additional load on the air conditioning equipment and, thereby, increases the use of electricity to cool the room.

# 4.5.4 Impact Analysis

## 4.5.4.1 Methodology

Energy impacts would occur if the Proposed Program would result in the wasteful, inefficient, or unnecessary consumption of energy resources during Program construction or operation. Energy impacts would also occur if the Proposed Program would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. This energy analysis evaluates the following sources of energy consumption associated with existing conditions and the Proposed Program.

### Energy Use During Construction

Implementation of the Proposed Program would result in energy use from construction activities such as off-road equipment use, employee and haul truck vehicle travel, and electricity use in temporary buildings. However, the specific size, location, and construction equipment that would be utilized for each individual project occurring under the Proposed Program is not currently known, with the exception of certain details that are available for construction of the joint-use facilities projects. With an anticipated buildout year of 2030, implementation of various projects associated with the Proposed Program would occur over an extended period and would depend on factors such as economic conditions, market and student demands, and other financial and District considerations. Without specific project-level details it is not possible to develop an accurate and comprehensive energy assessment for construction activities associated with the buildout of the Proposed Program.[5] Consequently, the determination of construction energy impacts for each individual development project, or a combination of these projects, would require the District to speculate regarding such potential future project-level environmental impacts. Thus, in the absence of the necessary construction information required to provide an informative and meaningful analysis, the evaluation of potential construction-related energy impacts resulting from implementation of the Proposed Program is conducted qualitatively

While specific joint-use facilities projects have not been defined, a quantitative analysis was able to be conducted based on the known locations of future joint-use facilities and assumptions related to the type of construction equipment, durations, etc., used for recently completed joint-use facilities in the District. Total construction energy use associated with future joint-use facilities was modeled using CalEEMod (version 2016.3.2) and data provided by the District (e.g., total number and acreage of joint-use facilities) to scale other inputs (e.g., off-road equipment, hauling trips) based on assumptions from other recent District joint-use facility analyses (Garcia-Craivanu pers. comm.).

### Energy Use During Operation

Projects related to academic facilities and schools that could be implemented under the Proposed Program would result in energy use from mobile, off-road equipment, natural gas, electricity, water, and waste sources. Mobile sources are vehicle trips associated with student drop-off/pickup, including school buses, as well as employee travel. Off-road sources include landscaping equipment. Natural gas combustion is associated with space and water heating requirements. Building electricity, water, and waste consumption would also result in energy use. Operational energy use

[5] Project-level information includes details such as the size and scale of the project to be constructed, construction schedule, equipment fleet, construction worker crew estimates, and demolition and grading quantities.

was quantified for existing (2019) and buildout (2030) conditions. Energy intensity of the academic facilities was provided by the District and was kept constant for existing and buildout conditions.

Joint-use facilities projects that could be implemented under the Proposed Program would result in energy use from mobile, off-road equipment, waste, and water sources. Mobile sources are vehicle trips associated with visitors to the facilities, and were estimated using the San Diego *Trip Generation Manual,* which is consistent with previous District analyses (City of San Diego 2003). Per the District, it was assumed that off-road equipment use would include a mower once per week, and an aerator and fertilizer quarterly at each joint-use facility. Waste and water energy use was estimated using CalEEMod defaults for park acreage provided by the District.

Fuel consumption during operation was calculated by converting GHG emissions estimated for the GHG analysis using the rate of carbon dioxide ($CO_2$) emissions per gallon of combusted gasoline and diesel. Fuel consumption was then converted to energy using industry standard emission factors for BTUs per gallon of gasoline and diesel. Energy use associated with area sources, such as natural gas consumption (for space and water heating), water consumption, electricity, wastewater, and solid waste removal was estimated based on the methods, assumptions, and data sources within CalEEMod for the proposed land uses. A full list of assumptions and energy calculations for Program operations can be found in Appendix D.

## 4.5.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining the significance of impacts associated with the demand placed on and expansions associated with energy use resulting from the implementation of the Proposed Program. The determination of whether an energy use impact would be significant is based on the thresholds described below and the professional judgment of the District as the Lead Agency and the recommendations of qualified personnel at ICF, all of which is based on the evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following.

1. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

# 4.5.4.3 Impacts and Mitigation Measures

***Threshold 1: Would the Proposed Program result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

Construction associated with new acquisition and new school or administrative facilities projects would occur over multiple years and require use of heavy off-road equipment such as dump trucks, cranes, excavators, tractors, and graders, among others. Energy use during construction would result from gasoline and diesel fuel for transportation of employees and haul trucks to and from the project sites, and diesel fuel for the operation of off-road equipment. Energy consumption would vary substantially depending on the level of activity, length of construction period, specific construction activities, types of equipment, and number of personnel.

Construction associated with new acquisition and new school or administrative facilities projects would occur intermittently within District boundaries throughout the course of the Proposed Program's buildout period. As the timing and intensity of most future projects are not known at this time, the precise energy effects of construction activities associated with this project category cannot be accurately quantified. The details of future projects, including number and scope of projects, is currently unknown because projects would be driven by District needs and other economic and planning considerations. As such, it is anticipated that in any given year, multiple projects could be constructed within District boundaries.

It is anticipated that, for any given project, total energy consumed during the construction period would represent a small demand on local and regional fuel supplies. However, depending on the size and scale of an individual project, along with its construction schedule and other parameters, there may also be instances where the construction-related energy use generated by a single project could be substantial. While many new acquisition and new school or administrative facilities projects may not require a significant amount of energy during construction relative to regional demand, it is possible that such projects could still result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction if measures are not taken to ensure energy is used efficiently. Therefore, the potential impacts regarding wasteful, inefficient, or unnecessary construction of new acquisition and new schools or administrative facilities projects would be significant (**Impact-EN-1**).

Implementation of **MM-GHG-1** would require the incorporation of best management practices to reduce GHG emissions from off-road construction equipment and emissions from the waste and mobile sectors. With the implementation of **MM-GHG-1**, **Impact-EN-1** would be reduced to less than significant. Therefore, with mitigation, new acquisition and new school or administrative facilities projects would not result in the wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

***Operation***

As discussed in Chapter 3, *Project Description*, of this PEIR, operations associated with new acquisition and new school or administrative facilities projects would result in the congregation of students in a new area and bring different activities, such as recess and sports games, to the area. New administrative facilities would also bring District staff to a new area. Because specific new acquisitions, or new school or administrative facilities, have not been identified at this time, quantitative analysis of changes in energy use associated with these projects would be speculative for this programmatic analysis. It is understood, however, that operation of these new facilities would have the potential to increase student capacity at a project site. Energy use during operation related to increased capacity would result from gasoline for transportation of employees and students to and from the project sites, and from utility-related consumption (e.g., electricity and natural gas in buildings, water consumption, wastewater and solid waste generation). Energy consumption would vary substantially depending on the type and size of the new facility that is built, which would affect the number of students and personnel traveling to and from the project site, as well as the amount of utility-related energy consumption. Therefore, it is anticipated that once operational new acquisition and new school or administrative facilities would require more energy than currently required under existing conditions. However, schools are considered growth accommodating, not growth-inducing, uses, and the District plans for new schools in response to growth projections provided in individual general plans. As such, population growth that increases energy consumption in the Program area could happen irrespective of the Proposed Program.

In addition, Table 4.5-5 outlines the applicability and analysis of the potential energy impact considerations from Appendix F, *Energy Conservation*, of the State CEQA Guidelines. Overall, given the state's future energy efficiency regulations, such as SB 100, newly constructed buildings will include more energy efficient design, so while the increase in students at the sites would result in increased energy usage overall, the increase would not necessarily result in inefficient energy use, and the Proposed Program would help meet energy conservation goals because it would promote energy efficiency and sustainability measures to reduce energy consumption. While energy consumption would increase under this project category relative to existing conditions, it would be consistent with the state's energy conservation goals, and operation of new school and administrative facilities would not result in wasteful, inefficient, or unnecessary consumption of energy. This impact would be less than significant, and mitigation would not be required.

**Table 4.5-5. Proposed Program Comparison to State CEQA Guidelines Appendix F**

| Impact Considerations from Appendix F | Program Applicability and Analysis |
|---|---|
| Energy requirements and energy use efficiencies by amount and fuel type for each stage of the project. | **Applies.** See Table 4.5-7, which summarizes energy consumption by source for construction of joint-use facilities. Construction of the other project categories would result in energy use from gasoline and diesel fuel for transportation of employees and haul trucks to and from project sites, and diesel fuel for the operation of off-road equipment. Without specific project details, this energy use is not able to be quantified. Table 4.5-6 breaks down operational energy use generated by the academic facilities (whole site modernization, and upgrades of existing facilities) and joint-use facilities by amount and fuel type. As indicated, the Proposed Program would increase the use of electricity and the need for fossil fuels such as diesel fuel, gasoline, and natural gas compared to existing conditions. Because no specific new acquisitions, or new school or administrative facilities are identified at this |

| Impact Considerations from Appendix F | Program Applicability and Analysis |
|---|---|
| | time, there was no quantitative analysis for operational energy use. However, an increase in energy use for operation of this project category is anticipated related to transportation of employees and students, and utility consumption. |
| Effects on local and regional energy supplies and the need for additional capacity | **Applies.** Operation of the Proposed Program, including all project categories, would not require upgrades to existing energy infrastructure to accommodate the increased energy demand of the Proposed Program. Furthermore, the District would implement various sustainability and energy-saving features to reduce the overall energy demand of the Proposed Program, such as indoor water reduction measures and high-efficiency lighting systems. As such, there would be no adverse effects on local or regional energy supplies as a result of the Proposed Program. |
| Effects of the project on peak and base period demands for electricity and other forms of energy | **Applies.** Energy load would vary over time, but current energy supply and infrastructure would be able to accommodate the additional demand without interruption or issues to existing customers and without the need for new infrastructure. As noted above, the District would implement various sustainability and energy-saving features to reduce the overall energy demand of the Proposed Program, including all project categories. With implementation of the District's *Architects Professional Services Manual* checklists, the Proposed Program would not affect peak and base-period demand. |
| Degree to which the project complies with existing energy standards | **Applies.** The Proposed Program, including all project categories, would be fully compliant with all existing energy standards, including the Clean Energy and Pollution Reduction Act of 2015, Energy Building Regulations and Energy Conservation Standards, and California Energy Code. The Proposed Program would include energy-efficient lighting and building materials within a project site and would reduce GHG emissions by implementing sustainability measures. Any new or upgraded lighting would be operated consistent with District AR 3511(a), which requires that lighting be turned off once all students and staff have left a school facility. |
| Effects of the project on energy resources | **Applies.** The Proposed Program, including all project categories, would not result in an adverse impact on energy resources. There are sufficient energy resources to accommodate the additional energy demand for all project categories, and the District would implement of various sustainability and energy-saving features to reduce impacts on energy resources. Any new or upgraded lighting would be operated consistent with District AR 3511(a), which requires that lighting be turned off once all students and staff have left a school facility. |
| Projected transportation energy use requirements and overall use of efficient transportation alternatives | **Applies.** The Proposed Program, including all project categories, would increase the need for fossil fuels compared to baseline conditions due to increased vehicle miles traveled (VMT) during operation. Operation of the proposed project could result in increased VMT due to the increased student enrollment up to current planned capacity at existing academic facilities, as well as new trips associated with joint-use facilities. However, as discussed in Section 4.13, *Transportation,* while the Proposed Program would result in increased VMT, the per student VMT would decrease because students would be returning to or enrolling in their assigned District schools and therefore traveling reduced distances compared to current conditions. Additionally, the Proposed Program would not conflict with the District's ongoing efforts involving bus retrofit and fleet turnover programs, which would result in increased transportation-related energy efficiency. |

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-EN-1: Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of New School or Administrative Facilities.** Construction activities associated with new acquisition and new school or administrative facilities projects would have the potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. This is a potentially significant impact.

#### *Operation*

Operations associated with new school and administrative facilities would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

### Mitigation Measures

For **Impact-EN-1**:

> Implement **MM-GHG-1: Implement Best Management Practices During Construction,** as described in Section 4.7, *Greenhouse Gas Emissions*.

### Level of Significance After Mitigation

#### *Construction*

Construction of new acquisition and new school or administrative facilities projects would not result in the wasteful, inefficient, or unnecessary use of energy. Impacts would be less than significant.

#### *Operation*

Operations associated with new acquisition and new school or administrative facilities projects would not result in the wasteful, inefficient, or unnecessary use of energy. Impacts would be less than significant.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

Construction associated with whole site modernization projects would be similar to construction of new acquisition and new school or administrative facilities projects, discussed above. Construction would occur over multiple years and require use of heavy off-road equipment. Energy use during construction would result from gasoline and diesel fuel for transportation of employees and haul trucks to and from the project sites, and diesel fuel for the operation of off-road equipment. As noted above, energy use could vary substantially from project to project.

Individual whole site modernization projects may not require a significant amount of energy during construction relative to regional demand; however, it is possible that future projects within this project category could still result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction if measures are not taken to ensure energy is used efficiently.

Therefore, potential impacts for wasteful, inefficient, or unnecessary construction of whole site modernization projects would be significant (**Impact-EN-2**).

Implementation of **MM-GHG-1** would require the incorporation of best management practices to reduce GHG emissions from off-road construction equipment and emissions from the waste and mobile sectors. With the implementation of **MM-GHG-1**, **Impact-EN-2** would be reduced to less than significant. Therefore, with mitigation, whole site modernization projects would not result in the wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

***Operation***

As discussed in Chapter 3, operation of whole site modernization projects would be similar to operations at existing facilities with the possibility of new or reconfigured pick-up and drop-off locations. These operational improvements would not increase the student enrollment capacity at the individual project sites or the number of staff at District administrative facilities. As described in Section 4.5.4.1, *Methodology*, analysis of changes in operational energy use with implementation of the Proposed Program assumes that student enrollment at existing academic facilities would increase to current permitted capacity. This quantitative approach would include implementation of whole site modernization projects.

Future operations at the District facilities that would involve the use of energy resources include employee and student transportation vehicle trips, and utility-related consumption (e.g., electricity and natural gas in buildings, water consumption, wastewater and solid waste generation). Table 4.5-5 outlines the applicability and analysis of the potential energy impact considerations from Appendix F of the State CEQA Guidelines, as they relate to the Proposed Program, including whole site modernization projects. Overall, the proposed project would assist with energy conservation goals because it would promote energy efficiency and sustainability measures to reduce energy consumption.

Table 4.5-6 summarizes operational energy use estimates generated by academic facilities under existing (2019) and 2030 conditions with and without the Proposed Program. Once operational, the Proposed Program would require more energy than currently required at individual Program sites under existing conditions. As shown in Table 4.5-6, operation of the academic facilities is estimated to require 1,385,178 million BTUs per year, and 1,698,603 million BTUs of energy per year would be required for the Proposed Program (academic facilities plus joint-use facilities) during future operations. This energy use represents a 303,972 million BTU increase for annual operation of academic facilities, and a 352,839 million BTU increase for annual operation of the Proposed Program as a whole. This increase in energy use is related to the increase in school enrollment to permitted capacity with site improvements. Because energy intensity (on a per student or per building size basis) was assumed to be the same for existing and future conditions, actual energy use is expected to be lower than presented here, given the state's future energy efficiency regulations, such as SB 100. Modernized buildings will include more energy efficient design compared to existing conditions, so while the increase in students at the sites would result in increased energy usage overall, the increase would not necessarily result in inefficient energy use.

**Table 4.5-6. Estimated Energy Consumption (million BTUs/year)**

| | Existing Operations | 2030 (Buildout) Operations | Change in Energy Consumption |
|---|---|---|---|
| **Academic Facilities[1]** | | | |
| Natural Gas | 129,958 | 194,140 | 64,182 |
| Electricity | 358,333 | 556,161 | 197,828 |
| Gasoline | 418,023 | 410,212 | (7,811) |
| Diesel | 174,891 | 224,664 | 49,773 |
| *Total Energy Use from Academic Facilities* | *1,081,206* | *1,385,178* | *303,972* |
| **Joint-Use Facilities** | | | |
| Natural Gas | -- | -- | -- |
| Electricity | 23,699 | 28,075 | 3,657 |
| Gasoline | 230,998 | 273,652 | 42,654 |
| Diesel | 9,860 | 11,697 | 1,838 |
| *Total Energy Use from Joint-Use Facilities* | *264,557* | *308,813* | *48,148* |
| **Total** | **1,345,763** | **1,698,603** | **352,839** |

Source: Appendix D.

[1] Academic facility energy estimates assume student enrollment at existing academic facilities would increase to current permitted capacity with future improvements. Energy estimates do not include energy use resulting from non-school uses (e.g., administrative buildings) or capacity increasing projects (e.g., new schools).

Notes: Energy is provided in million BTUs for comparison purposes. Totals may not add due to rounding.

BTUs can be converted to gallons of gasoline and diesel using the following constants: 113,927 BTU/1 gallon of gasoline; 129,488 BTU/1 gallon of diesel. BTUs can be converted to kilowatt-hours (kWh)/year using the 3,416 BTUs per kWh constant. Natural gas is reported in BTUs.

As discussed in further detail in Section 4.7, the District has expressed interest in using a wide variety of existing and emerging renewable energy sources on school campuses, and has pledged a goal of 90% energy offset. Further, per the *Dream Big Initiative* and design guide, the District will continue to pursue their goals of increasing solar energy usage, achieving net zero energy by 2030, and increasing LED lighting (District 2014, 2017). Lastly, any new or upgraded lighting would be operated consistent with District AR 3511(a), which requires that lighting be turned off once all students and staff have left a school facility. As a result of these plans, while implementation of whole site modernization projects would result in an increase in overall energy use, the District's goals and commitments related to energy conservation would ensure that energy use from this project category would not be wasteful, inefficient, or unnecessary. The impact for whole site modernization projects would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-EN-2: Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects would have the potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. This is a potentially significant impact.

***Operation***

Operations associated with whole site modernization projects would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

### Mitigation Measures

For **Impact-EN-2**:

Implement **MM-GHG-1,** as described in Section 4.7.

### Level of Significance After Mitigation

***Construction***

Construction activities associated with whole site modernization projects would not result in the wasteful, inefficient, or unnecessary use of energy. Impacts would be less than significant.

***Operation***

Whole site modernization projects would not result in the wasteful, inefficient, or unnecessary use of energy. Impacts would be less than significant.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

***Construction***

Construction associated with upgrades of existing school and administrative facilities would be similar to construction of new acquisition and new school or administrative facilities and whole site modernization projects, both discussed above. However, construction of projects within this project category would differ slightly in that they would be short-term and only require use of medium-sized equipment such as air compressors, cement mixers, industrial saws, welders, etc. Energy use during construction would result from the same sources discussed above, including gasoline and diesel fuel for transportation of employees and haul trucks to and from the project sites, and diesel fuel for the operation of off-road equipment. As noted above, energy use could vary substantially from project to project.

Individual upgrade projects may not require a significant amount of energy during construction relative to regional demand; however, it is possible that future projects within this project category could still result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction if measures are not taken to ensure energy is used efficiently. Therefore, potential impacts for wasteful, inefficient, or unnecessary construction of upgrades of existing school and administrative sites projects would be significant (**Impact-EN-3**).

Implementation of **MM-GHG-1** would require the incorporation of best management practices to reduce GHG emissions from off-road construction equipment and emissions from the waste and mobile sectors. With the implementation of **MM-GHG-1**, **Impact-EN-3** would be reduced to less than significant. Therefore, with mitigation, upgrades of existing school and administrative sites projects would not result in the wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

***Operation***

As discussed in Chapter 3, upgrades of existing school and administrative sites would not result in any operational changes as there would be no increase in student capacity or number of staff at District school or administrative facilities. There would also be no change in, or addition of, activities at the sites.

Analysis of changes in operational energy use with implementation of this project category assumes that student enrollment at existing academic facilities would increase to current permitted capacity. This quantitative approach would include energy use resulting from implementation of upgrades of existing school and administrative sites projects.

Table 4.5-5 outlines the applicability and analysis of the potential energy impact considerations from Appendix F of the State CEQA Guidelines, as they relate to the Proposed Program, including upgrades of existing school and administrative sites. Overall, the Proposed Program would assist with energy conservation goals because it would promote energy efficiency and sustainability measures to reduce energy consumption. However, as discussed above and summarized in Table 4.5-6, operational changes would result in an increase in annual energy use of 303,972 million BTUs per year for academic facilities, and 352,839 million BTUs per year for the Proposed Program as a whole. This increase in energy use is related to the increase in school enrollment to permitted capacity with site improvements. Because energy intensity (on a per student or per building size basis) was assumed to be the same for existing and future conditions, actual energy use is expected to be lower than presented here, given the state's future energy efficiency regulations, such as SB 100. Modernized buildings will include more energy efficient design compared to existing conditions, so while the increase in students at the sites would result in increased energy usage overall, the increase would not necessarily result in inefficient energy use.

In addition, as discussed above under whole site modernization projects, the District has expressed interest in using a wide variety of existing and emerging renewable energy sources on school campuses, and has pledged a goal of 90% energy offset. Further, per the *Dream Big Initiative* and design guide, the District will continue to pursue their goals of increasing solar energy usage, achieving net zero energy by 2030, and increasing LED lighting (District 2014, 2017). Lastly, any new or upgraded lighting would be operated consistent with District AR 3511(a), which requires that lighting be turned off once all students and staff have left a school facility. As a result of these plans, while implementation of upgrades of existing school and administrative sites would result in an increase in overall energy use, the District's goals and commitments related to energy conservation would ensure that energy use from this project category would not be wasteful, inefficient, or unnecessary. The impact for upgrades of existing school and administrative sites would be less than significant.

**Level of Significance Prior to Mitigation**

***Construction***

**Impact-EN-3: Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Upgrades of Existing School and Administrative Sites.** Construction activities associated with upgrades of existing school and administrative sites projects would have the potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. This is a potentially significant impact.

***Operation***

Operations associated with upgrades of existing school and administrative sites would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

### Mitigation Measures

For **Impact-EN-3**:

Implement **MM-GHG-1,** as described in Section 4.7.

### Level of Significance After Mitigation

***Construction***

Construction activities associated with upgrades of existing school and administrative sites projects would not result in the wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

***Operation***

Operation activities associated with upgrades of existing school and administrative sites would not result in the wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

***Construction***

Construction associated with j-use facilities development including fields, pools, and lay All Day Program projects would be similar to construction of the three project categories discussed above. Construction would be short-term and would require use of heavy off-road equipment such as those discussed above for new acquisition and new school or administrative facilities projects. Energy use during construction would result from the same sources discussed above, including gasoline and diesel fuel for transportation of employees and haul trucks to and from the project sites, and diesel fuel for the operation of off-road equipment. As noted above, energy use could vary substantially from project to project.

Certain construction-specific details were provided by the District for recent joint-use facilities that have been constructed and were utilized to estimate energy consumptions from project construction. As the specific construction schedule is not known, annual energy use cannot be determined at this time. Therefore, Table 4.5-7 conservatively presents the total energy consumption necessary for the construction of all future joint-use fields (20 joint-use facilities, totaling 69.06 acres).

**Table 4.5-7. Estimated Construction Energy Consumption by Source for Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program Projects**

| Source | Total MBTUs |
|---|---|
| **Diesel** | |
| Trucks | 19,500 |
| Equipment | 73,357 |
| *Total Diesel* | *92,857* |
| **Gasoline** | |
| Workers | 1,890 |
| *Total Gasoline* | *1,890* |
| **Total** | **94,746** |

Source: Appendix D.
Per data provided by the District, a total of 20 joint-use facilities totaling 69.09 acres would be constructed under the Proposed Program.

As shown in Table 4.5-7, the majority of energy use during construction would be attributed to use of diesel-powered construction equipment, followed by the use of diesel-powered trucks for material hauling and vendor trips. As with the project categories discussed above, energy consumed during construction of joint-use facilities development projects represents a small demand on local and regional fuel supplies; however, it is possible that future projects within this project category could still result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction if measures are not taken to ensure energy is used efficiently. Therefore, potential impacts for wasteful, inefficient, or unnecessary construction of the joint-use facilities development including fields, pools, and Play All Day Program project category would be significant (**Impact-EN-4**).

Implementation of **MM-GHG-1** would require the incorporation of best management practices to reduce GHG emissions from off-road construction equipment and emissions from the waste and mobile sectors. With the implementation of **MM-GHG-1**, **Impact-EN-4** would be reduced to less than significant. Therefore, with mitigation, joint-use facilities projects would not result in the wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

### Operation

During operation, joint-use facilities would not result in an increase in student capacity but would increase the frequency of use of the facilities by the community consistent with the stipulations of the joint-use agreements described in Section 3.4.1.4 of the *Project Description* for this PEIR.

Analysis of changes in operational energy use related to the joint-use facilities assumes an increase in VMT and off-road equipment use such as mowers, aerators, and fertilizers. Table 4.5-5 outlines the applicability and analysis of the potential energy impact considerations from Appendix F of the State CEQA Guidelines, as they relate to the Proposed Program, including joint-use facilities projects. Overall, the Proposed Program would assist with energy conservation goals because it would promote energy efficiency and sustainability measures to reduce energy consumption.

Table 4.5-6 summarizes operational energy use estimates generated specifically by joint-use facilities under existing (2019) and buildout (2030) conditions with and without the Proposed

Program. Once operational, joint-use facilities would require more energy than is required under existing conditions due to gasoline and diesel consumption for motor vehicle trips, diesel for operation of off-road equipment, and electricity related to water use. As shown in Table 4.5-6, operation of the joint-use facilities is estimated to require 308,813 million BTUs per year by 2030, which is an approximate 48,148 million BTU increase per year over existing conditions. This is not considered a substantial increase in energy consumption, and the operation of joint-use facilities would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

#### Level of Significance Prior to Mitigation

***Construction***

**Impact-EN-4: Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Joint-Use Facilities.** Construction associated with joint-use facilities projects would have the potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. This is a potentially significant impact.

***Operation***

Operations associated with joint-use facilities would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

#### Mitigation Measures

For **Impact-EN-4**:

Implement **MM-GHG-1,** as described in Section 4.7.

#### Level of Significance After Mitigation

***Construction***

Construction activities associated with joint-use facilities projects would not result in the wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

***Operation***

Operations associated with joint-use facilities projects would not result in the wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

## Site-Specific Analysis

### Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.5-8. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the Whole Site Modernization project category.

**Table 4.5-8. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K–8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K–8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019b.

### Construction

Construction associated with the near-term, site-specific whole site modernization projects would result in energy use from gasoline and diesel fuel for transportation of employees and haul trucks to and from a project site, and diesel fuel for the operation of off-road equipment. As noted under the program-level analysis for Whole Site Modernization projects, energy consumption would vary substantially depending on the level of activity, length of construction period, specific construction activities, types of equipment, and number of personnel.

These near-term, site-specific whole site modernization projects would occur intermittently within District boundaries throughout the course of the buildout period. As the timing and intensity of these projects are not known at this time, the precise effects of construction activities associated with these projects cannot be accurately quantified. Project details, including the scope of projects, are currently unknown because projects would be driven by District needs and other economic and planning considerations. As such, it is anticipated that in any given year, multiple near-term, site-specific whole site modernization projects could be constructed within the Program area.

As mentioned above, whole site modernization projects may not require a significant amount of energy during construction relative to regional demand; however, it is possible that these near-term, site-specific whole site modernization projects could still result in the wasteful, inefficient, or

unnecessary consumption of energy resources during project construction if measures are not taken to ensure energy is used efficiently (**Impact-EN-2**).

### Operation

Operation of the near-term, site-specific whole site modernization projects would be similar to operations at existing facilities, and improvements would not increase the student capacity at the individual project sites or the number of staff at District administrative facilities. However, it is assumed that implementation of the Proposed Program would result in an increase in student enrollment at existing academic facilities to current permitted capacity. Future operations would require energy use for employee and student vehicle trips, and utility-related consumptions (e.g., electricity and natural gas in buildings, water consumption, wastewater and solid waste generation). As a result, once operational, the near-term, site-specific whole site modernization projects would require more energy than required at specific project sites under existing conditions. This increase in energy use is related to the increase in school enrollment to permitted capacity with site improvements. Because energy intensity (on a per student or per building size basis) was assumed to be the same for existing and future conditions, actual energy use is expected to be lower than presented here, given the state's future energy efficiency regulations, such as SB 100. Modernized buildings will include more energy efficient design compared to existing conditions, so while the increase in students at the sites would result in increased energy usage overall, the increase would not necessarily result in inefficient energy use.

As discussed above, the District has expressed interest in using a wide variety of existing and emerging renewable energy sources on school campuses, and has pledged a goal of 90% energy offset. Further, per the *Dream Big Initiative* and design guide, the District will continue to pursue their goals of increasing solar energy usage, achieving net zero energy by 2030, and increasing LED lighting (District 2014, 2017). Lastly, any new or upgraded lighting would be operated consistent with District AR 3511(a), which requires that lighting be turned off once all students and staff have left a school facility. As a result of these plans, while implementation of the near-term, site-specific whole site modernization projects would result in an increase in overall energy use, the District's goals and commitments related to energy conservation would ensure that energy use from this project category would not be wasteful, inefficient, or unnecessary. The impact for whole site modernization projects would be less than significant.

## Level of Significance Prior to Mitigation

### Construction

**Impact-EN-2: Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects would have the potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. This is a potentially significant impact.

### Operation

Operations associated with the near-term, site-specific whole site modernization projects would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

### Mitigation Measures

For **Impact-EN-2**:

Implement **MM-GHG-1**, as described in Section 4.7.

### Level of Significance After Mitigation

#### Construction

Construction activities associated with near-term, site-specific whole site modernization projects would not result in the wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

#### Operation

Operation of near-term, site-specific whole site modernization projects would not result in the wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

## *Threshold 2: Would the Proposed Program conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

## Program-Level Analysis

### All Project Categories

#### Impact Discussion

##### *Construction and Operation*

State and local renewable energy and energy efficiency plans that are applicable to the Proposed Program are discussed above in Section 4.5.3, *Applicable Laws and Regulations.* State plans, including California Title 24 energy efficiency standards, SB 350, and SB 100 contain required standards related to energy efficiency and renewable energy development. Regional and local plans related to energy efficiency include SANDAG's Regional Plan and Regional Energy Strategy, and the District's *Dream Big* initiative. The Proposed Program is required to comply with the state and local plans and regulations, all of which are aimed at increasing energy efficiency and renewable energy development. Table 4.5-9 provides a consistency analysis with state and local energy plans and regulations.

**Table 4.5-9. Proposed Program Consistency with State and Local Energy Plans and Regulations**

| Regulation, Plan, or Policy | Program Applicability and Consistency |
|---|---|
| **Clean Energy and Pollution Reduction Act of 2015** (SB 350) | **Consistent.** The Clean Energy and Pollution Reduction Act of 2015 requires the following by 2030: (1) an RPS of 50% and (2) a doubling of efficiency for existing buildings. The New Acquisition and New School or Administrative Facilities project category includes improvements such as sustainable landscaping, recycled water systems for irrigation, and energy efficient facilities; and the Upgrades of Existing School and Administrative Sites project category includes the construction of solar panels, and utility upgrades, such as electrical, water, sewer, and storm drains with more efficient systems, consistent with SB 350. |
| **Energy Building Regulations and Energy Conservation Standards** (Title 20, Energy Building Regulations; Title 24, Energy Conservation Standards) | **Consistent.** The Proposed Program would result in the construction of newer, energy efficient buildings that would comply with existing building codes. At a minimum, new acquisition and new school or administrative facilities projects occurring under the Proposed Program would be required to comply with the current California Building Standards Code, Title 24, California Code of Regulations, which includes a broad set of requirements for energy conservation and green design. The design of building shells and building components will include features that conserve energy. These may include high-efficiency urinals, low-flow faucets, LED lighting, efficient HVAC systems, and energy-efficient appliances. |
| **California's 2017 Climate Change Scoping Plan** | **Consistent.** The 2017 Climate Change Scoping Plan established a framework for implementing programs to meet the 2030 goal of reducing emissions 40% from 2020 levels. The Upgrades of Existing School and Administrative Sites project category includes the construction of solar panels, and utility upgrades, such as electrical, water, sewer, and storm drains with more efficient systems, consistent with the Scoping Plan. |
| **The 100 Percent Clean Energy Act of 2018** | **Consistent.** SB 100 increases the RPS target set in SB 350 to 60% by 2030. It also requires all retail sales of electricity to California end-users and electricity procured to serve state agencies to be provided by zero-carbon resources by 2045. Building energy efficiency is expected to increase as a result of compliance with Title 24 building codes, which are expected to move toward zero net energy for newly constructed buildings. |
| **SANDAG's San Diego Forward: The Regional Plan** | **Consistent.** SANDAG's Regional Plan established a long-range blueprint for the San Diego region's growth and development through the year 2050. Because the proposed project would not include any components that would result in population growth, unplanned or otherwise, it would be consistent with the 2050 RTP. |
| **SANDAG Regional Energy Strategy** | **Consistent.** SANDAG's RES established long-term goals related to energy efficiency, renewable energy, distributed generation, and transportation fuel, among others. The strategies and goals found in the RES were used as guidance for development of the energy components of the 2050 RTP/SCS. |
| **District Environmental Sustainability Goals** | **Consistent After Mitigation.** The Proposed Program would be encouraged to implement District-wide sustainability actions per its *Dream Big* initiative and CHPS criteria related to energy. Implementation of **MM-GHG-2** would ensure that energy-reducing design features would be incorporated into future projects associated with the Proposed Program. |

As shown in Table 4.5-9, the Proposed Program is consistent with all applicable plans, regulations, and policies related to energy and energy efficiency, except for those proposed by the District's

*Dream Big* initiatives, design guides, and CHPS criteria. Therefore, all project categories under the Proposed Program could conflict with state and local renewable energy and energy efficiency plans, and impacts would be potentially significant (**Impact-EN-5**).

Implementation of **MM-GHG-2** would require implementation of sustainable design features, including the use of LED lighting, installation of photovoltaic (PV) solar systems, energy management systems, and provision of trash, recycle, and food waste receptacles. This measures would ensure that the Proposed Program is consistent with the goals set forth in the District's *Dream Big* initiative, and with the energy-reducing design features proposed by the District per its design guidelines and CHPS criteria. Therefore, the Proposed Program would not conflict or obstruct a state or local plan for renewable energy or energy efficiency. With implementation of mitigation, impacts would be less than significant.

#### Level of Significance Prior to Mitigation

##### *Construction and Operation*

**Impact-EN-5: Inconsistency with District Environmental Sustainability Goals.** The Proposed Program could result in energy use due to construction and long-term operations. While future projects would aim to implement District-wide energy-reducing actions per its *Dream Big* initiative, design guide, and Collaborative for High Performance Schools criteria, there is no guarantee that all actions and design criteria would be incorporated into the design of all future projects. Therefore, it is conservatively assumed that all project categories under the Proposed Program would be inconsistent with the energy efficiency goals set forth by the District. This is a potentially significant impact.

#### Mitigation Measures

For **Impact-EN-5**:

Implement **MM-GHG-2: Incorporate Sustainable Design Features**, as described in Section 4.7.

#### Level of Significance after Mitigation

##### *Construction and Operation*

The Proposed Program would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

## Site-Specific Analysis

### Impact Discussion

#### Construction and Operation

Near-term site-specific whole site modernization projects (see Chapter 3), would be consistent with all applicable plans, regulations, and policies related to energy and energy efficiency except for those proposed by the District's *Dream Big* initiatives, design guides, and CHPS criteria. Therefore, those projects listed in Table 4.5-8 could conflict with state and local renewable energy and energy efficiency plans, and impacts would be potentially significant.

## Level of Significance Prior to Mitigation

### Construction and Operation

**Impact-EN-5: Inconsistency with District Environmental Sustainability Goals.** The Proposed Program could result in energy use due to construction and long-term operations. While future projects would aim to implement District-wide energy-reducing actions per its *Dream Big* initiative, design guide, and Collaborative for High Performance Schools criteria, there is no guarantee that all actions and design criteria would be incorporated into the design of all future projects. Therefore, it is conservatively assumed that all project categories under the Proposed Program would be inconsistent with the energy efficiency goals set forth by the District. This is a potentially significant impact.

## Mitigation Measures

For **Impact-EN-5**:

Implement **MM-GHG-2,** as described in Section 4.7.

## Level of Significance After Mitigation

### Construction and Operation

The near-term site-specific whole site modernization projects would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

# 4.6.1 Overview

This section describes the existing conditions and applicable laws and regulations for geology and soils, followed by an analysis of the Proposed Program's potential to: (1) directly or indirectly cause potential adverse effects as a result of geologic hazards, (2) result in substantial soil erosion or loss of topsoil, (3) be located on unstable ground, and (4) be located on expansive soils. The analyses presented in this section rely on the *Programmatic Level Geologic Conditions/Hazards Report* prepared by Ninyo & Moore (Appendix G).

Table 4.6-1 summarizes the significant impacts and mitigation measures (MMs) discussed in Section 4.6.4.3, *Impacts and Mitigation Measures*.

**Table 4.6-1. Summary of Significant Geology and Soils Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact GEO-1:** Potential to Result in Substantial Soil Erosion or the Loss of Topsoil During Construction of New School or Administrative Facilities. | **MM-HWQ-1**: Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would ensure implementation of appropriate construction BMPs to minimize the potential for soil erosion, including, but not limited to, minimization of the exposure time of disturbed areas through the use of sand bags, gravel, hale bales, etc.; surrounding the site with perimeter controls such as gravel bags; storage of building and construction materials on site; or covering temporary piles of soil/dirt with tarps. |
| **Whole Site Modernization** | | | |
| **Impact GEO-2:** Potential to Result in Substantial Soil Erosion or the Loss of Topsoil during Construction of Whole Site Modernizations or Joint-Use Facilities. | **MM-HWQ-1**: Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would ensure implementation of appropriate construction BMPs to minimize the potential for soil erosion, including, but not limited |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | to, minimization of the exposure time of disturbed areas through the use of sand bags, gravel, hale bales, etc.; surrounding the site with perimeter controls such as gravel bags; storage of building and construction materials on site; or covering temporary piles of soil/dirt with tarps. |
| **Upgrades of Existing School and Administrative Sites** | | | |
| All impacts identified for Upgrades of Existing School and Administrative Sites were less than significant. | No mitigation is required. | Less than Significant | N/A |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| **Impact GEO-2:** Potential to Result in Substantial Soil Erosion or the Loss of Topsoil during Construction of Whole Site Modernizations or Joint-Use Facilities. | **MM-HWQ-1**: Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would ensure implementation of appropriate construction BMPs to minimize the potential for soil erosion, including, but not limited to, minimization of the exposure time of disturbed areas through the use of sand bags, gravel, hale bales, etc.; surrounding the site with perimeter controls such as gravel bags; storage of building and construction materials on site; or covering temporary piles of soil/dirt with tarps. |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| All impacts identified for Near-Term, Site-Specific Whole Site Modernization Projects were less than significant. | No mitigation is required. | Less than Significant | N/A |

# 4.6.2 Existing Conditions

## 4.6.2.1 Geologic Setting

### Regional Geology

The Program area is situated in the coastal foothill section of the Peninsular Ranges Geomorphic Province. The province encompasses an area that extends approximately 900 miles from the Transverse Ranges and the Los Angeles Basin south to the southern tip of Baja California. The province varies in width from approximately 30 to 100 miles. In general, the province consists of rugged mountains underlain by Jurassic metavolcanic and metasedimentary rocks, and Cretaceous igneous rocks of the southern California batholith.

The Peninsular Ranges Province is traversed by a group of sub-parallel faults and fault zones trending roughly northwest. Several of these faults are considered active. The Elsinore, San Jacinto, and San Andreas faults are active fault systems located northeast of the Program area; and the Coronado Bank, San Diego Trough, and San Clemente faults are active faults located west of the Program area. The Rose Canyon fault zone is an active fault system that passes through the Program area. Figure 4.6-1 illustrates the location of the faults in the region.

#### Geologic Setting

The Program area is primarily divided into 16 clusters, which are organized geographically, with each centered on a high school and the elementary and middle schools that feed into that high school. There is also one unassigned cluster that does not contain any schools, but is within the District's boundaries. As identified in Figures 4.6-2 through 4.6-17, geologic mapping indicates that geology within the Program area significantly varies.

#### Clairemont Cluster

The Clairemont cluster includes artificial fill (Qaf), young alluvial flood plain deposits (Qya), very old paralic deposits (Qvop), and materials of the Scripps Formation (Tsc), Friars Formation (Tf), and Ardath Shale (Ta) (d). The geologic map of the Clairemont cluster is presented on Figure 4.6-2.

#### Crawford Cluster

The geology at the Crawford cluster includes old alluvial flood plain deposits (Qoa) and very old paralic deposits (Qvop), and materials of the San Diego Formation (Tsd), Mission Valley Formation (Tmv), Stadium Conglomerate (Tst), and Pomerado Conglomerate (Tp) (Kennedy and Tan 2008). The geologic map depicting the Crawford cluster is presented on Figure 4.6-3.

#### Henry Cluster

The geology at the Henry cluster includes young (Qya) and old flood plain deposits (Qoa), young colluvial deposits (Qyc), very old paralic deposits (Qvop), and materials of the Mission Valley Formation (Tmv), Stadium Conglomerate (Tst), Friars Formation (Tf), Granodiorite and tonalite undivided (Kgu), and Metasedimentary and metavolcanic rocks undivided (Mzu) (Kennedy and Tan 2008). The geologic map depicting the Henry cluster is presented on Figure 4.6-4.

## Hoover Cluster

The geology at the Hoover cluster includes artificial fill (Qaf), young alluvial (Qya) and colluvial deposits (Qyc), very old paralic deposits (Qvop), and materials of the San Diego Formation (Tsd), Mission Valley Formation (Tmv), and Stadium Conglomerate (Tst) (Kennedy and Tan 2008). The geologic map depicting the Hoover cluster is presented on Figure 4.6-5.

## Kearny Cluster

The geology at the Kearny cluster includes artificial fill (Qaf), young (Qya) and old alluvial deposits (Qoa), young colluvial deposits (Qyc), very old paralic deposits (Qvop), and materials of the San Diego Formation (Tsd), Mission Valley Formation (Tmv), Stadium Conglomerate (Tst), Friars Formation (Tf), and Scripps Formation (Tsc) (Kennedy and Tan 2008). The geologic map depicting the Kearny cluster is presented on Figure 4.6-6.

## La Jolla Cluster

The geology at the La Jolla cluster includes young alluvial (Qya) and colluvial deposits (Qyc), old alluvial deposits (Qoa), old (Qop) and very old paralic deposits (Qvop); materials of the San Diego Formation (Tsd), Scripps Formation (Tsc), Mount Soledad Formation (Tmss/Tmsc), Cabrillo Formation (Kcs/Kccg), Point Loma Formation (Kp); and undivided rocks of the Rosario Group in the offshore area (Kuo) (Kennedy and Tan 2008). The geologic map depicting the La Jolla cluster is presented on Figure 4.6-7.

## Lincoln Cluster

The geology at the Lincoln cluster includes artificial fill (Qaf), young (Qya) and old alluvial deposits (Qoa), undivided marine deposits in offshore region (Qmo), old (Qop) and very old paralic deposits (Qvop), and materials of the San Diego Formation (Tsd), Otay Formation (To), Mission Valley Formation (Tmv), and Stadium Conglomerate (Tst) (Kennedy and Tan 2008). The geologic map depicting the Lincoln cluster is presented on Figure 4.6-8.

## Madison Cluster

The geology at the Madison cluster includes young (Qya) and old alluvial deposits (Qoa), very old paralic deposits (Qvop), and materials of the Stadium Conglomerate (Tst), Friars Formation (Tf), and Scripps Formation (Tsc) (Kennedy and Tan 2008). The geologic map depicting the Madison cluster is presented on Figure 4.6-9.

## Mira Mesa Cluster

The geology at the Mira Mesa cluster includes artificial fill (Qaf), young alluvial deposits (Qya), very old paralic deposits (Qvop), and materials of the San Diego Formation (Tsd), Stadium Conglomerate (Tst), Friars Formation (Tf), Scripps Formation (Tsc), Ardath Shale (Ta), and Metasedimentary and metavolcanic rocks undivided (Mzu) (Kennedy and Tan 2008). The geologic map depicting the Mira Mesa cluster is presented on Figure 4.6-10.

## Mission Bay Cluster

The geology at the Mission Bay cluster includes artificial fill (Qaf), marine beach deposits (Qmb), young alluvial (Qya) and colluvial deposits (Qyc), old (Qop) and very old paralic deposits (Qvop),

and materials of the San Diego Formation (Tsd), Ardath Shale (Ta), and Mount Soledad Formation (Tmss/Tmsc) (Kennedy and Tan 2008). The geologic map depicting the Mission Bay cluster is presented on Figure 4.6-11.

## Morse Cluster

The geology at the Morse cluster includes young alluvial deposits (Qya), very old paralic deposits (Qvop), and materials of the San Diego Formation (Tsd), Otay Formation (To), Mission Valley Formation (Tmv), and Metasedimentary and metavolcanic rocks undivided (Mzu) (Kennedy and Tan 2008). The geologic map depicting the Morse cluster is presented on Figure 4.6-12.

## Point Loma Cluster

The geology at the Point Loma cluster includes artificial fill (Qaf), marine beach deposits (Qmb), young alluvial deposits (Qya), old (Qop) and very old paralic deposits (Qvop), and materials of the Mount Soledad Formation (Tmss/Tmsc), Cabrillo Formation (Kcs/Kccg), Point Loma Formation (Kp), and undivided rocks of the Rosario Group in offshore region (Kuo) (Kennedy and Tan 2008). The geologic map depicting the Point Loma cluster is presented on Figure 4.6-13.

## San Diego Cluster

The geology at the San Diego cluster includes artificial fill (Qaf), young alluvial (Qya) and colluvial deposits (Qyc), old (Qop) and very old paralic deposits (Qvop), and materials of the San Diego Formation (Tsd), Pomerado Conglomerate (Tp), Mission Valley Formation (Tmv), and Stadium Conglomerate (Tst) (Kennedy and Tan 2008). The geologic map depicting the San Diego cluster is presented on Figure 4.6-14.

## Scripps Ranch Cluster

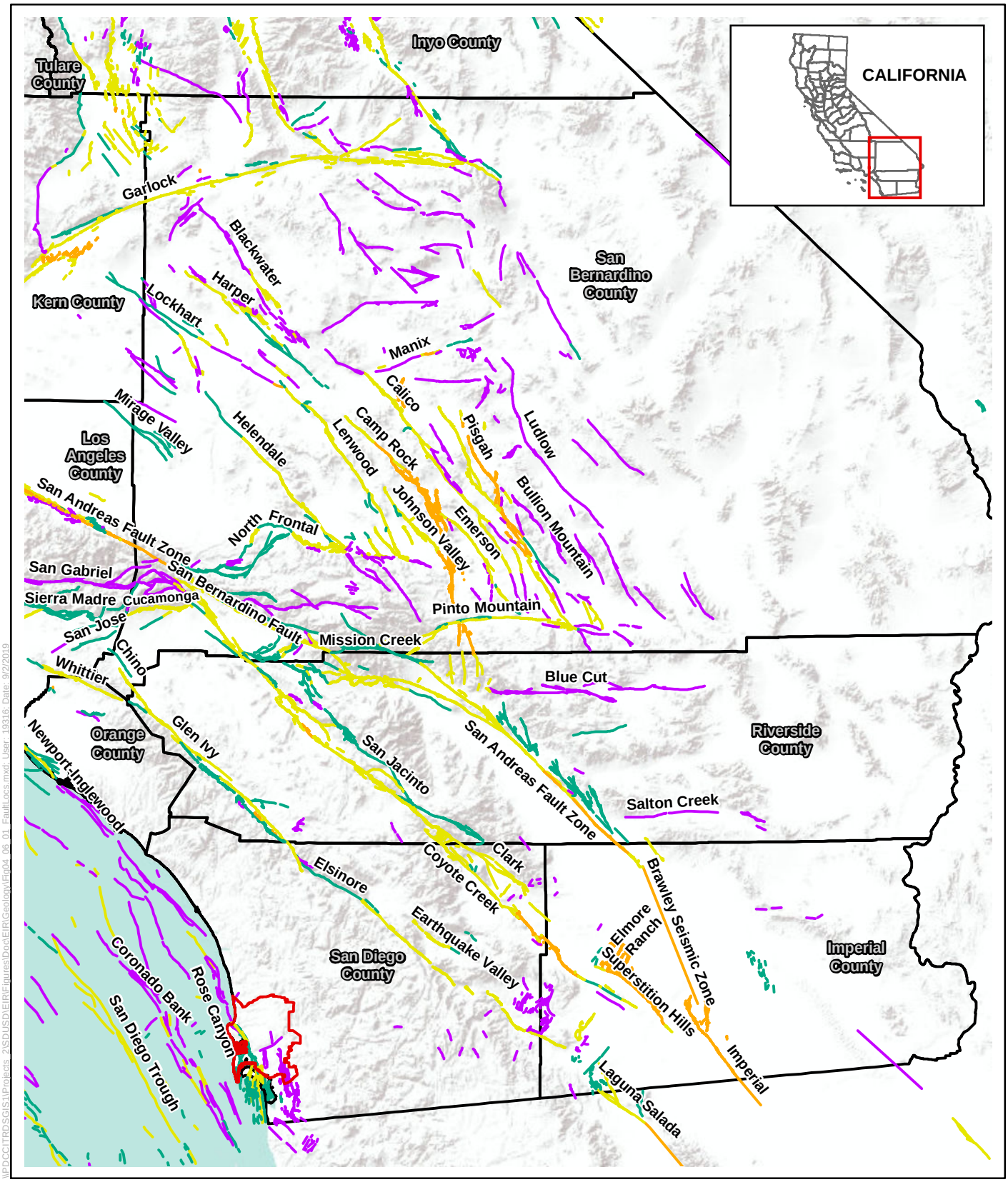
The geology at the Scripps Ranch cluster includes young alluvial deposits (Qya), very old paralic deposits (Qvop), and materials of the Pomerado Conglomerate (Tp), Mission Valley Formation (Tmv), Stadium Conglomerate (Tst), Friars Formation (Tf), Torrey Sandstone (Tt), and Metasedimentary and metavolcanic rocks undivided (Mzu) (Kennedy and Tan 2008). The geologic map depicting the Scripps Ranch cluster is presented on Figure 4.6-15.

## Serra Cluster

The geology at the Serra cluster includes young alluvial (Qya) and colluvial deposits (Qyc), very old paralic deposits (Qvop), and materials of the Pomerado Conglomerate (Tp), Mission Valley Formation (Tmv), Stadium Conglomerate (Tst), Friars Formation (Tf), and Metasedimentary and metavolcanics rocks undivided (Mzu) (Kennedy and Tan 2008). The geologic map depicting the Serra cluster is presented on Figure 4.6-16.

## University City Cluster

The geology at the University City cluster includes artificial fill (Qaf), paralic estuarine deposits (Qpe), marine beach deposits (Qmb), young alluvial flood plain deposits (Qya), old (Qop) and very old paralic deposits (Qvop), and materials of the Stadium Conglomerate (Tst), Torrey Sandstone (Tt), Scripps Formation (Tsc), and Ardath Shale (Ta) (Kennedy and Tan 2008). The geologic map depicting the University City cluster is presented on Figure 4.6-17.




**Legend**

- State/County Boundary
- San Diego Unified School District Program EIR Project Area

**California Fault Activity**

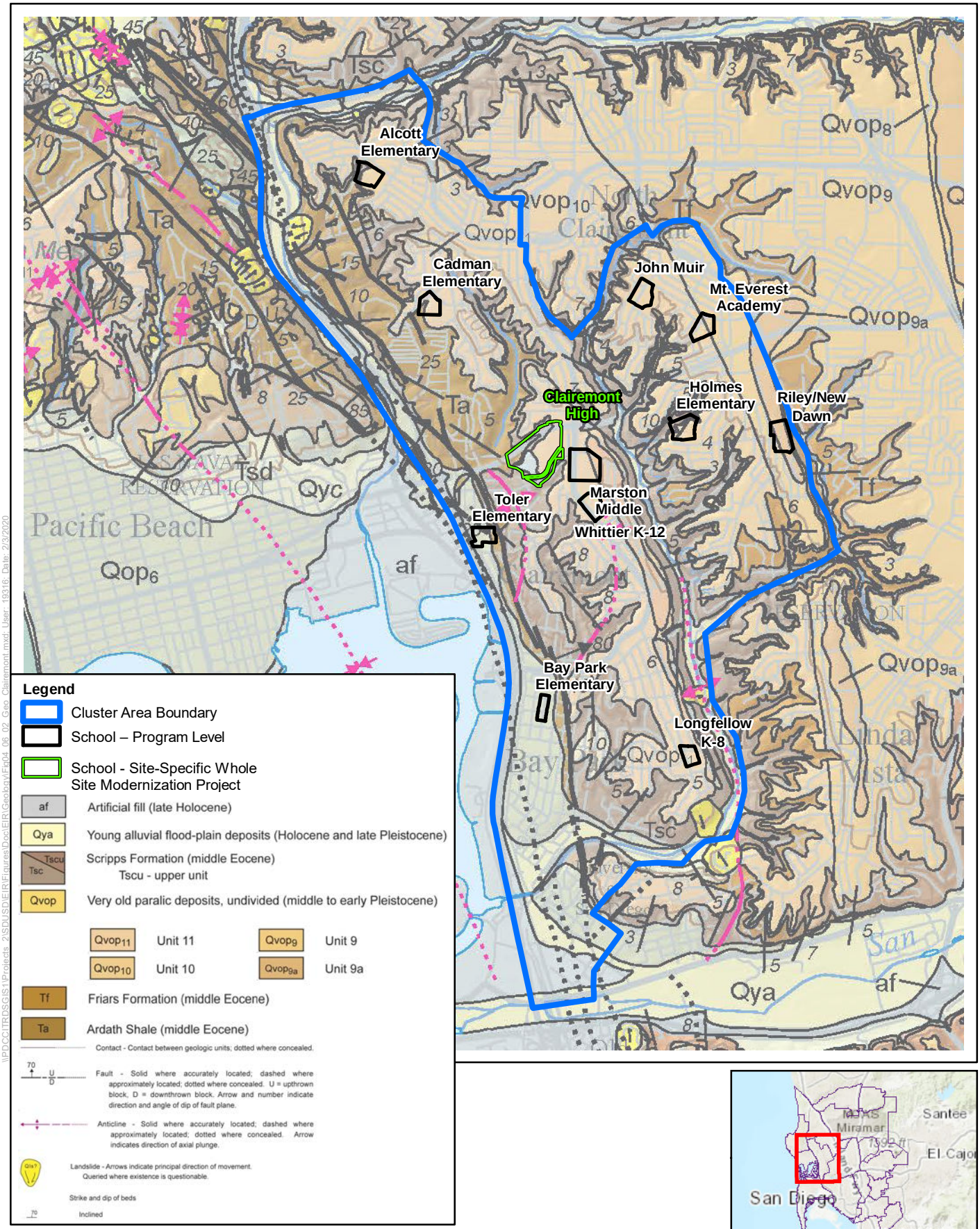
- Historically Active
- Holocene Active
- Late Quaternary (Potentially Active)
- Quaternary (Potentially Active)

Source: USGS 2006; ESRI

0 15 30 Miles

1 in =30 miles

**Figure 4.6-1**
**Fault Locations**

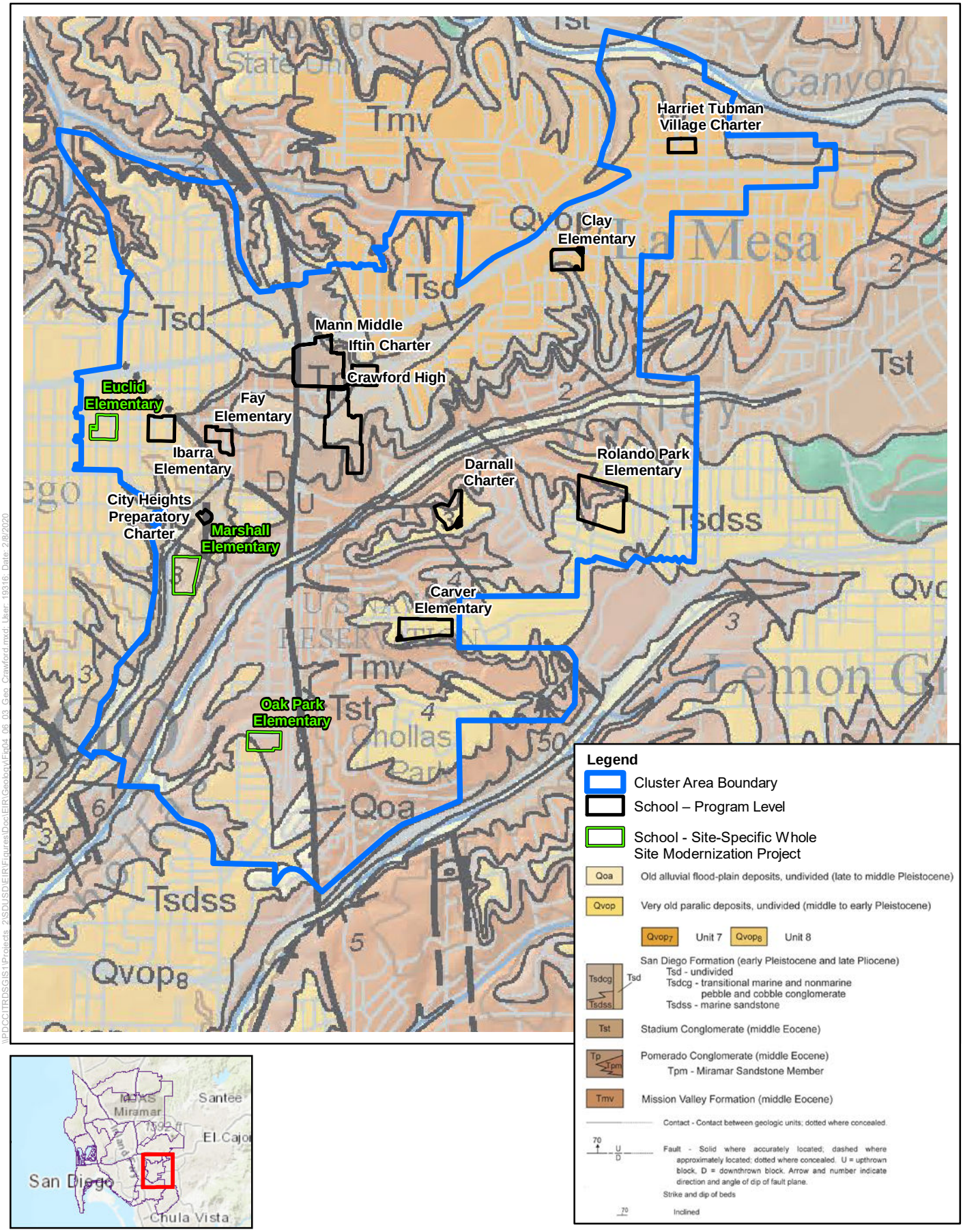



Source: Ninyo & Moore (2019)

0 0.5 1 Miles

N

**Figure 4.6-2**
**Geology - Clairemont Cluster Area**



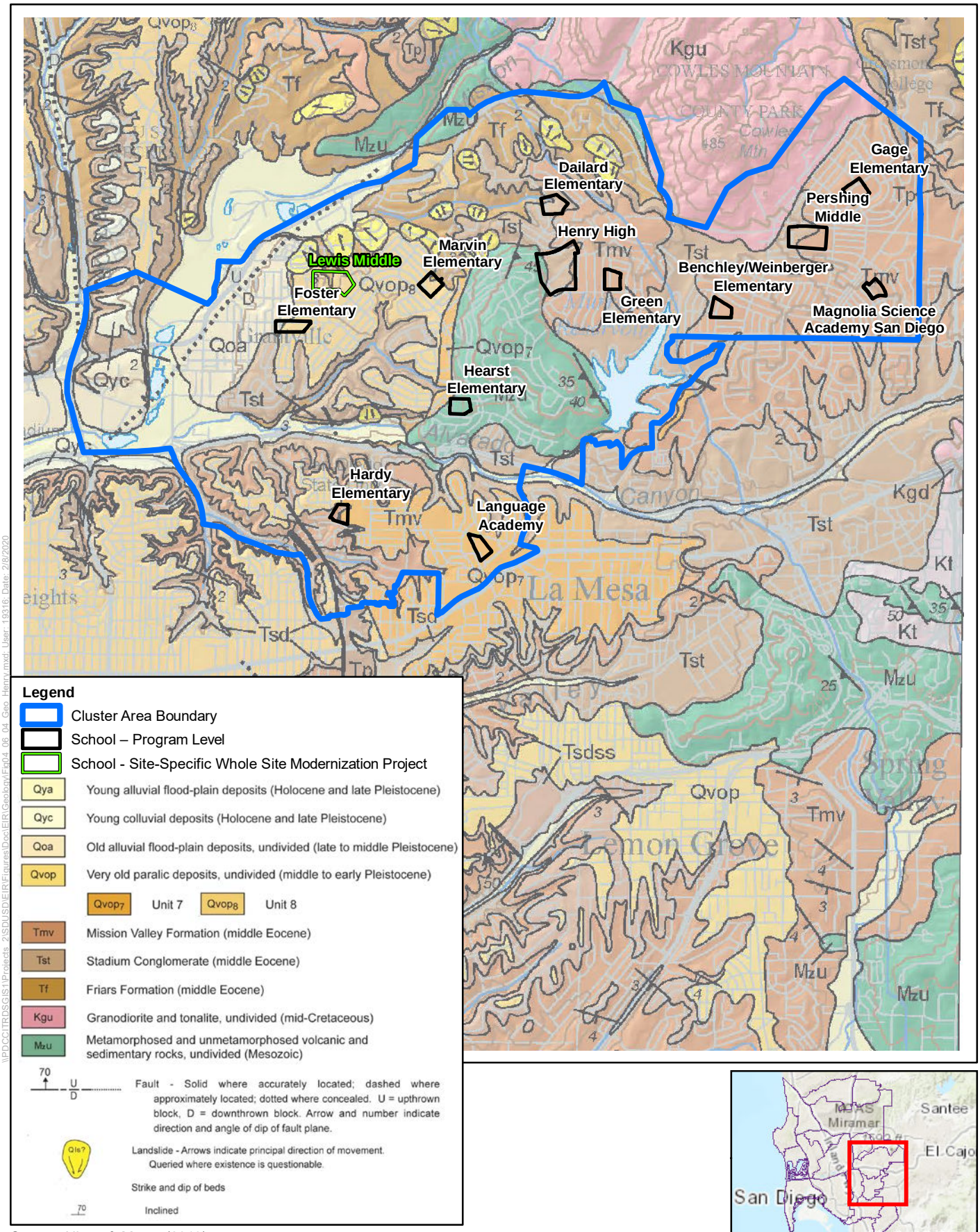




Source: Ninyo & Moore (2019)

0 0.25 0.5 Miles

**Figure 4.6-3**
**Geology - Crawford Cluster Area**



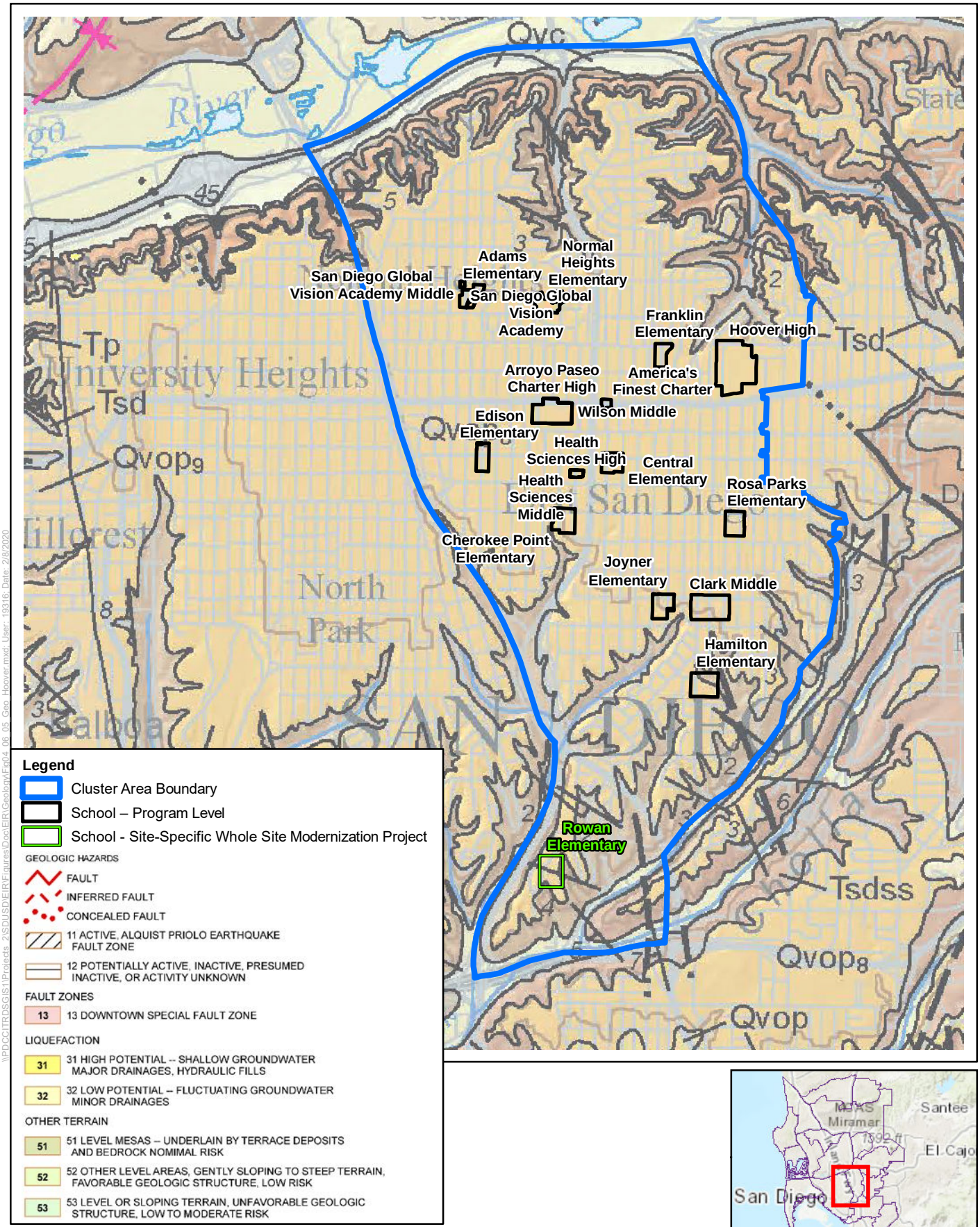

**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project
- Qya — Young alluvial flood-plain deposits (Holocene and late Pleistocene)
- Qyc — Young colluvial deposits (Holocene and late Pleistocene)
- Qoa — Old alluvial flood-plain deposits, undivided (late to middle Pleistocene)
- Qvop — Very old paralic deposits, undivided (middle to early Pleistocene)
  - $Qvop_7$ Unit 7
  - $Qvop_8$ Unit 8
- Tmv — Mission Valley Formation (middle Eocene)
- Tst — Stadium Conglomerate (middle Eocene)
- Tf — Friars Formation (middle Eocene)
- Kgu — Granodiorite and tonalite, undivided (mid-Cretaceous)
- Mzu — Metamorphosed and unmetamorphosed volcanic and sedimentary rocks, undivided (Mesozoic)
- Fault - Solid where accurately located; dashed where approximately located; dotted where concealed. U = upthrown block, D = downthrown block. Arrow and number indicate direction and angle of dip of fault plane.
- Qls? — Landslide - Arrows indicate principal direction of movement. Queried where existence is questionable.
- Strike and dip of beds
- Inclined

Source: Ninyo & Moore (2019)

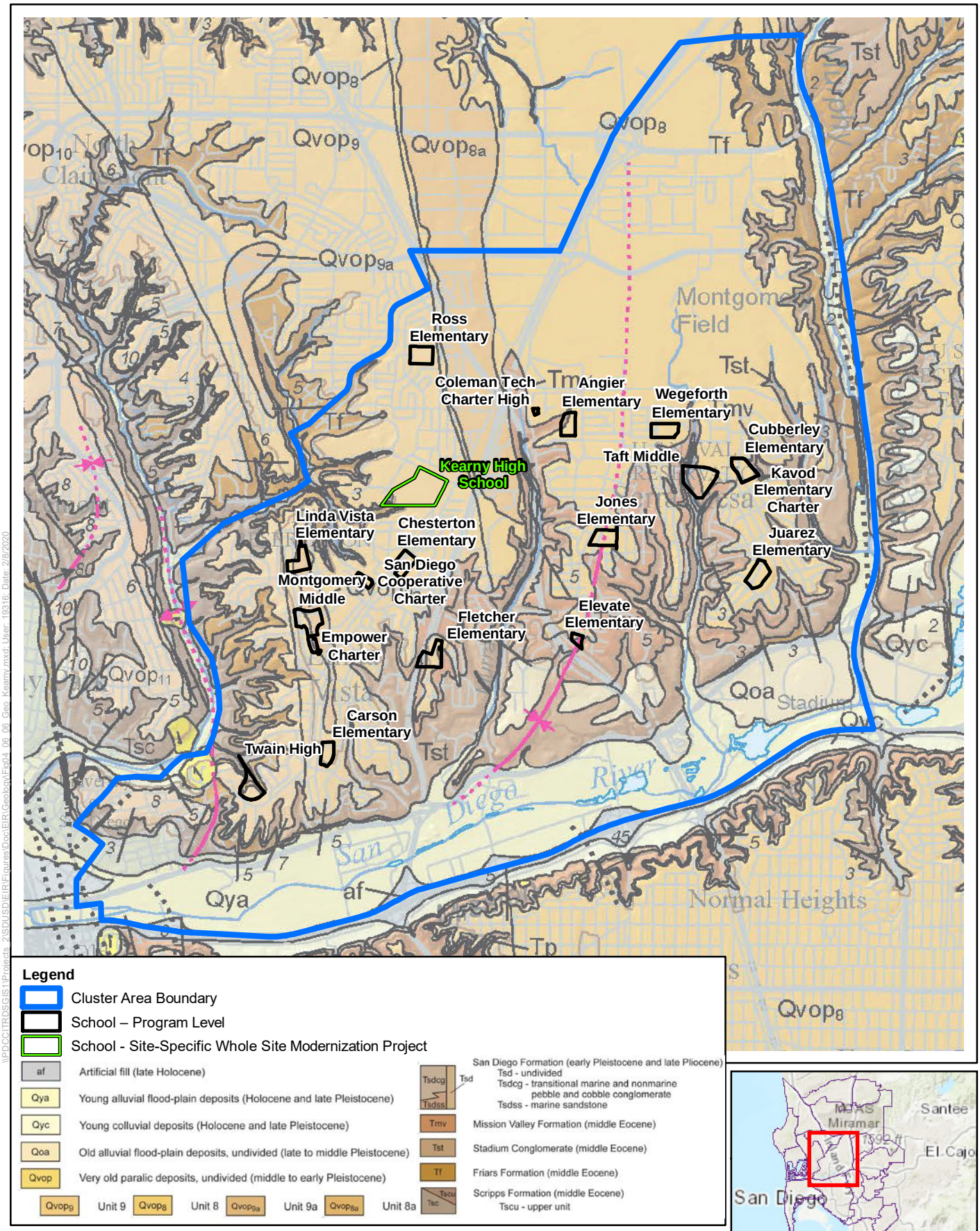
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**Figure 4.6-4**
**Geology - Henry Cluster Area**



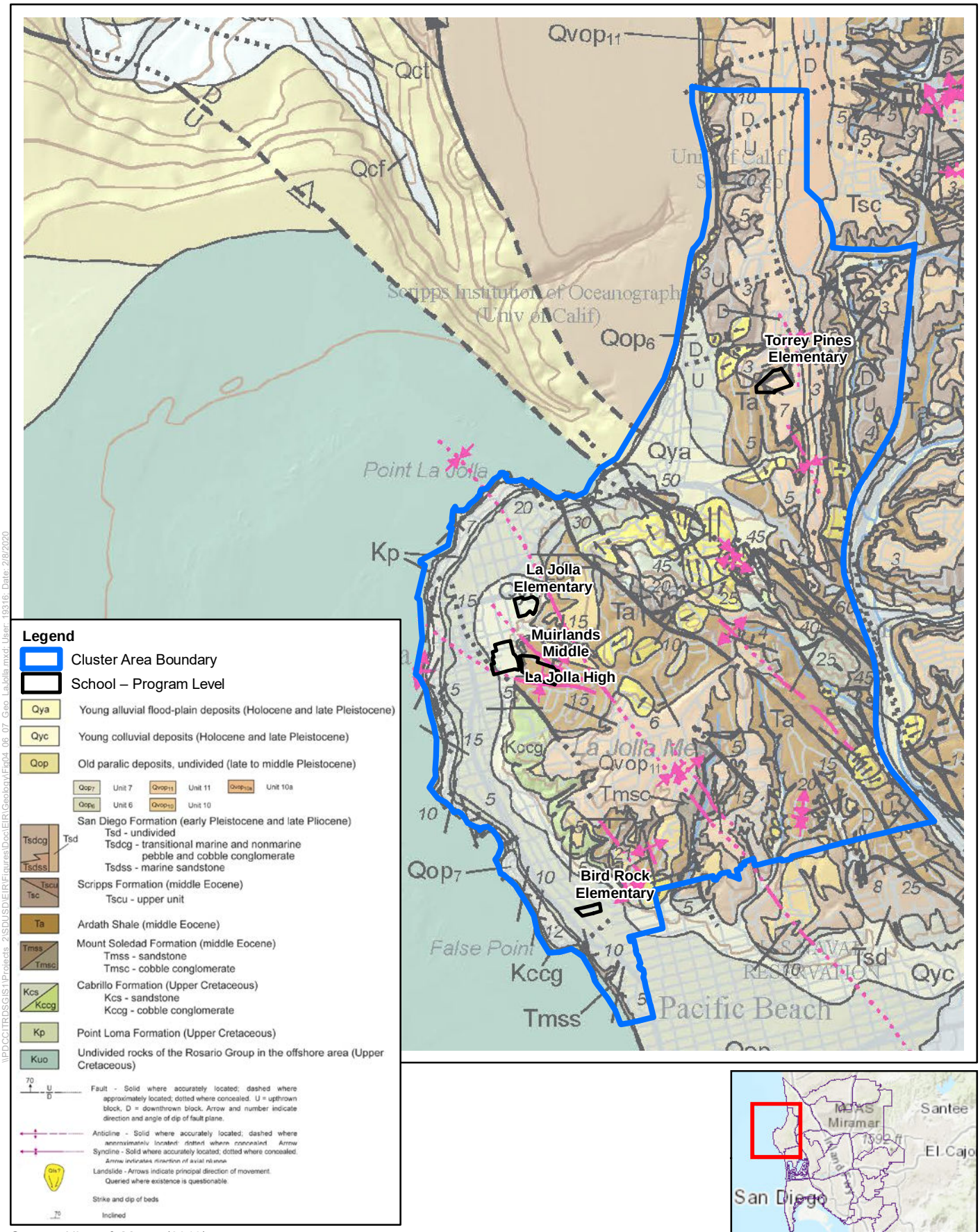

Source: Ninyo & Moore (2019)

**Figure 4.6-5**
**Geology - Hoover Cluster Area**




Source: Ninyo & Moore (2019)

**Figure 4.6-6**
**Geology - Kearny Cluster Area**

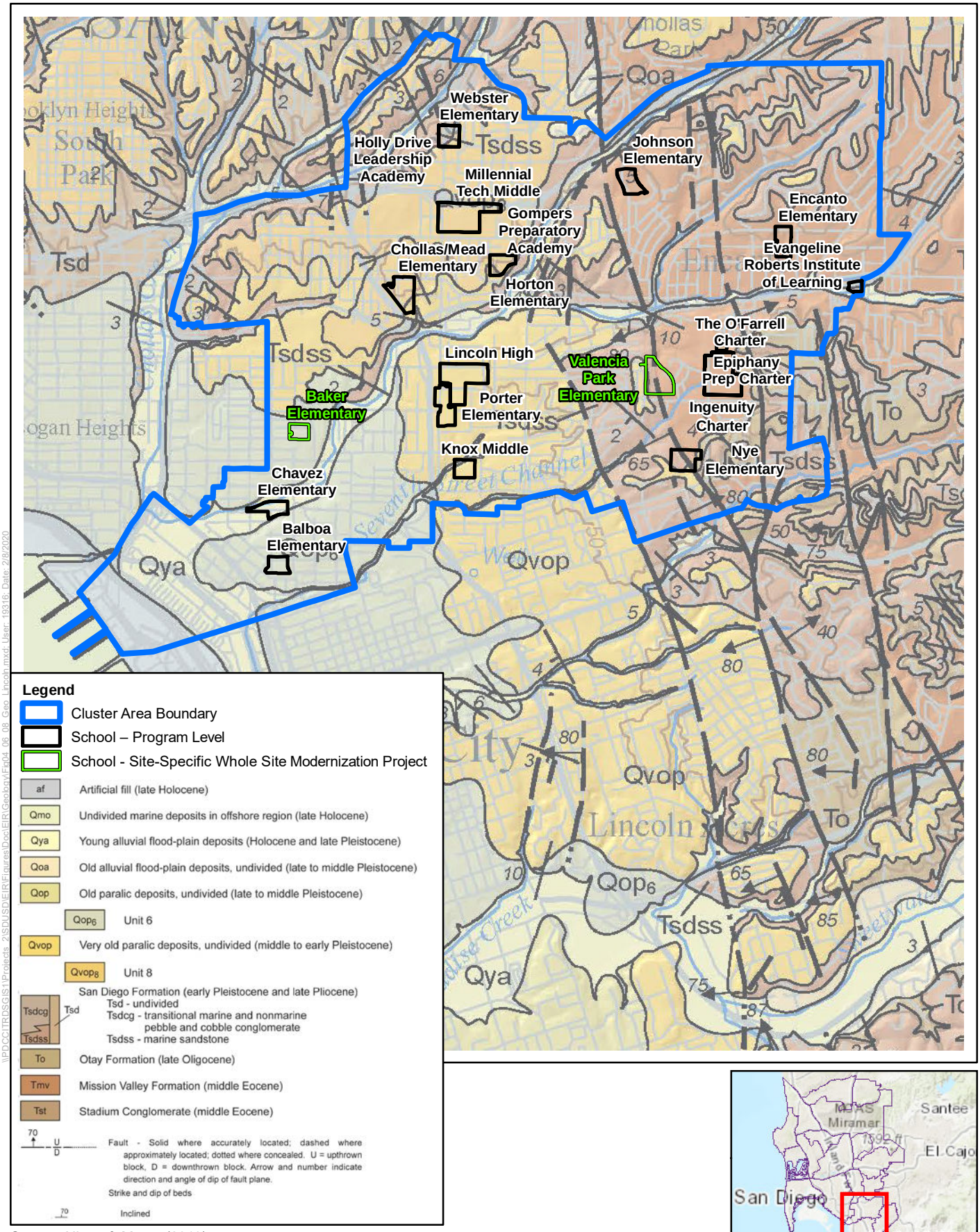



Source: Ninyo & Moore (2019)

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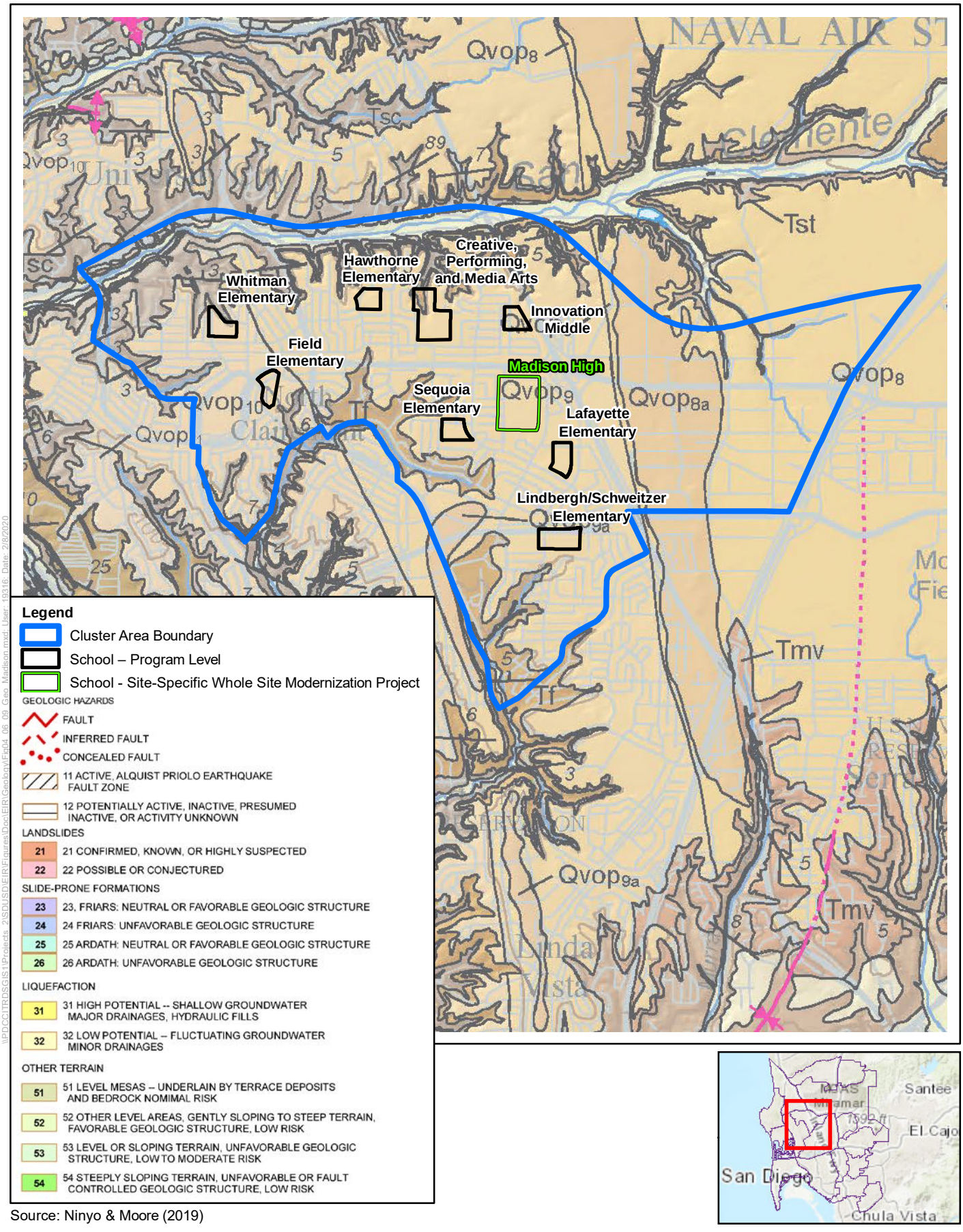
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**Figure 4.6-7**
**Geology - La Jolla Cluster Area**




Source: Ninyo & Moore (2019)

**Figure 4.6-8**
**Geology - Lincoln Cluster Area**





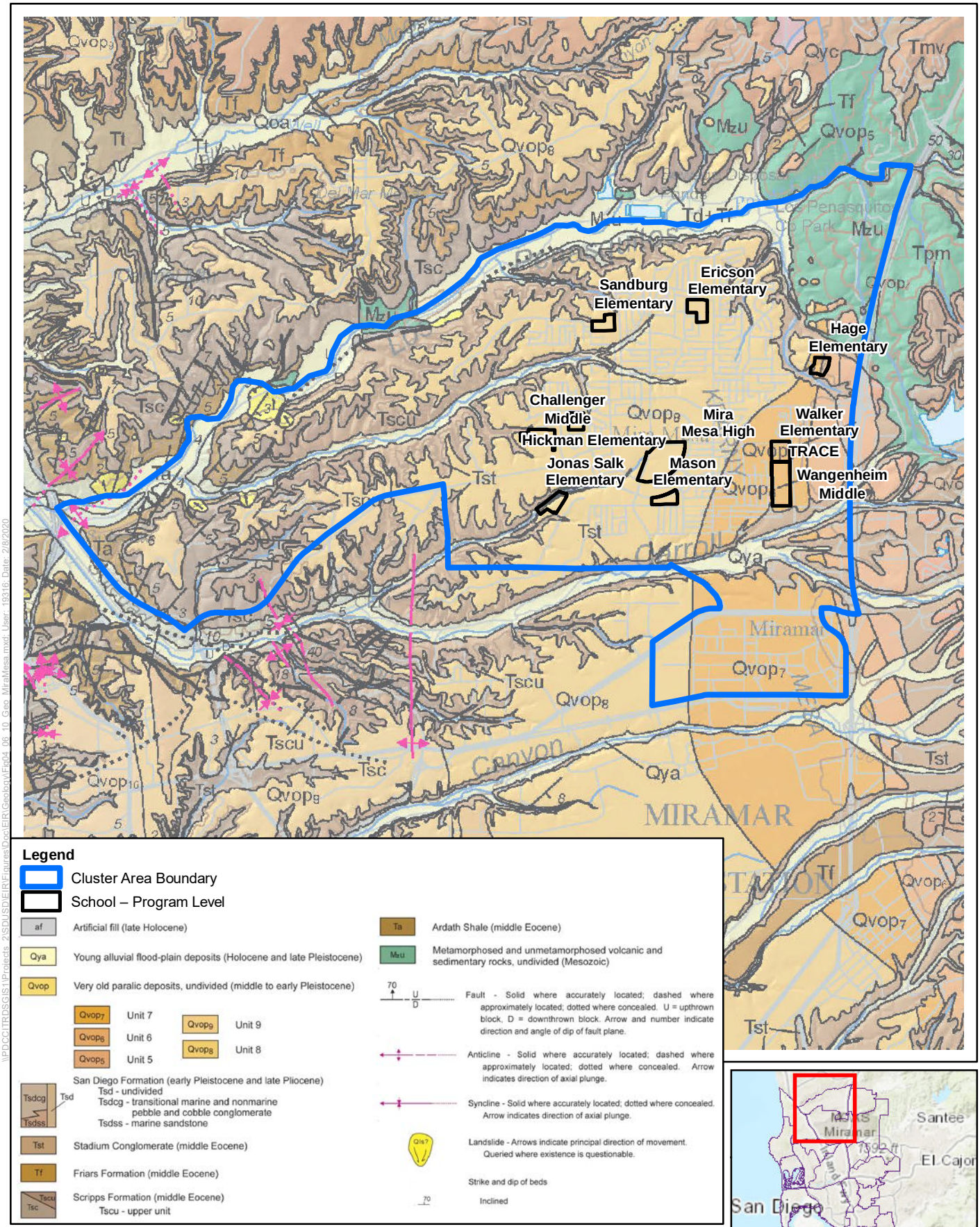


Source: Ninyo & Moore (2019)

0 0.5 1 Miles

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**Figure 4.6-9**
**Geology - Madison Cluster Area**

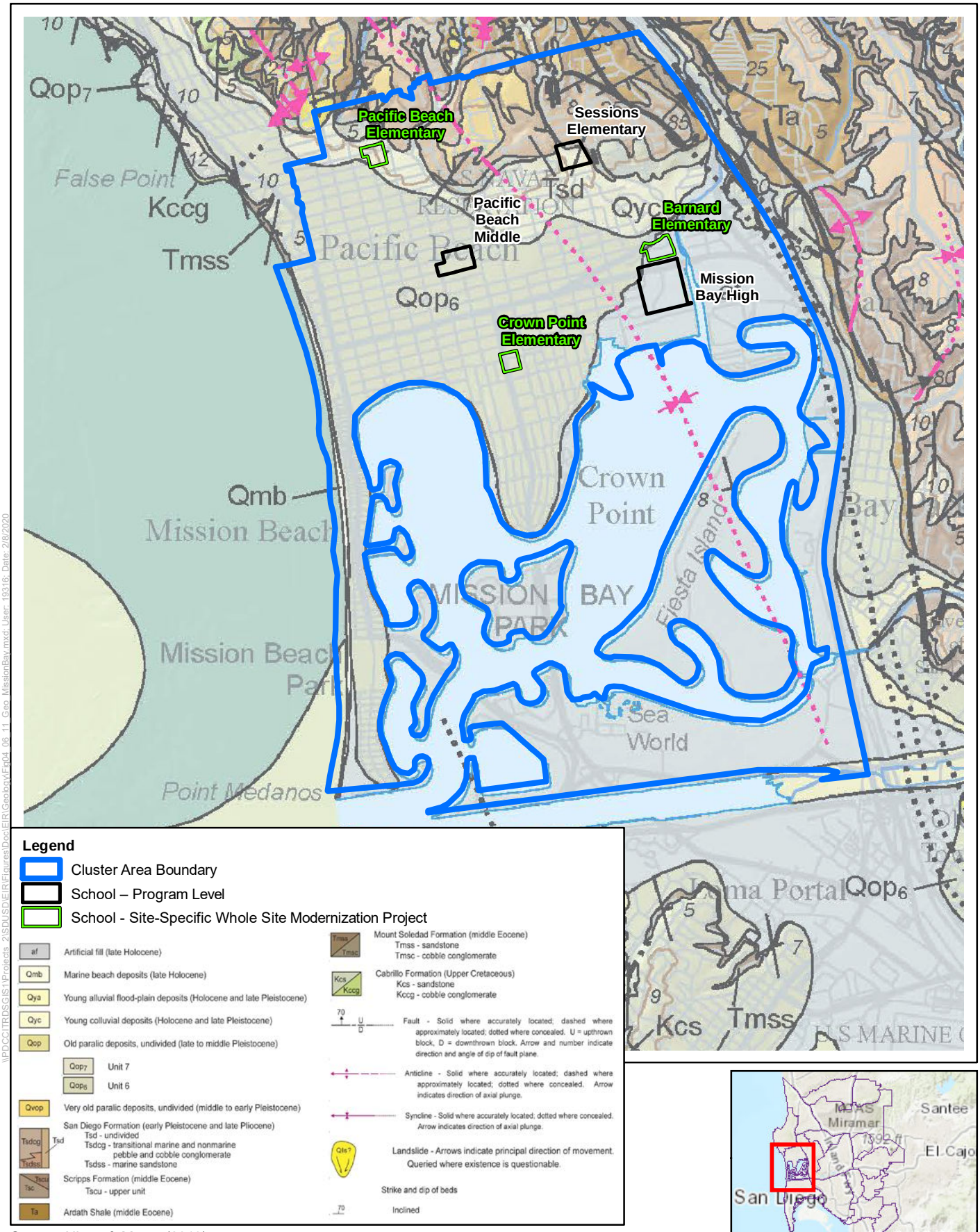



Source: Ninyo & Moore (2019)

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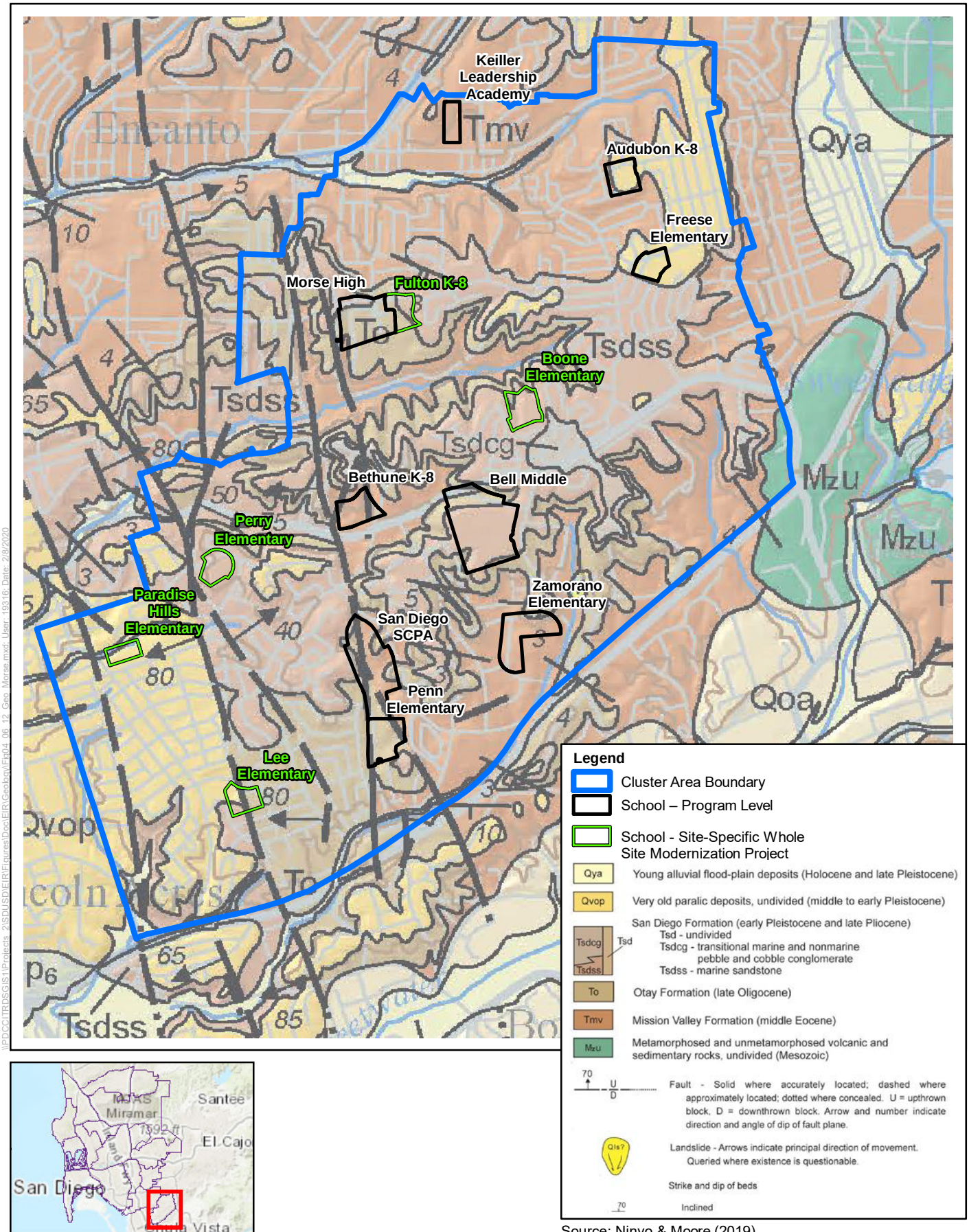
**Figure 4.6-10**
**Geology - MiraMesa Cluster Area**




Source: Ninyo & Moore (2019)

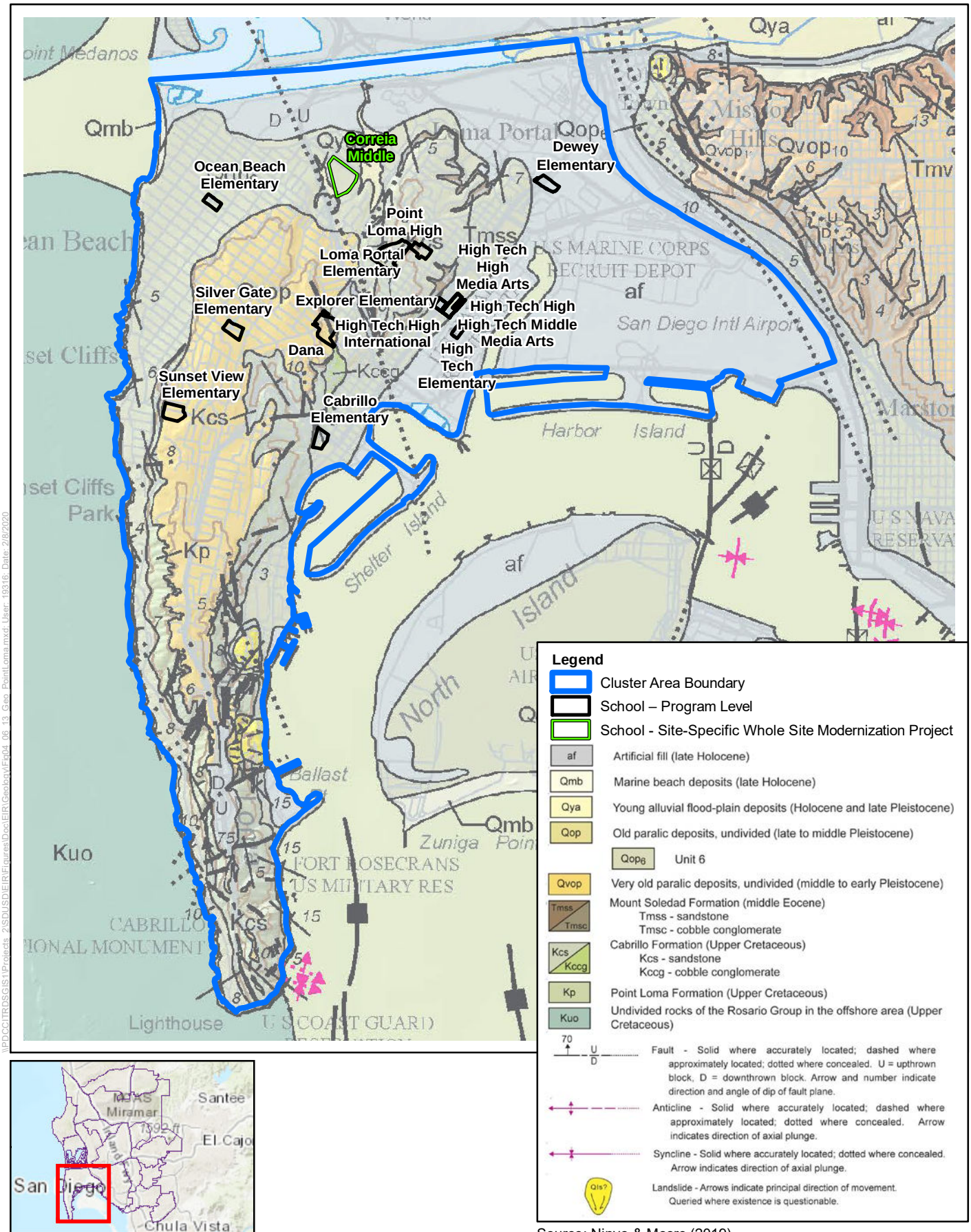
**Figure 4.6-11**
**Geology - Mission Bay Cluster Area**

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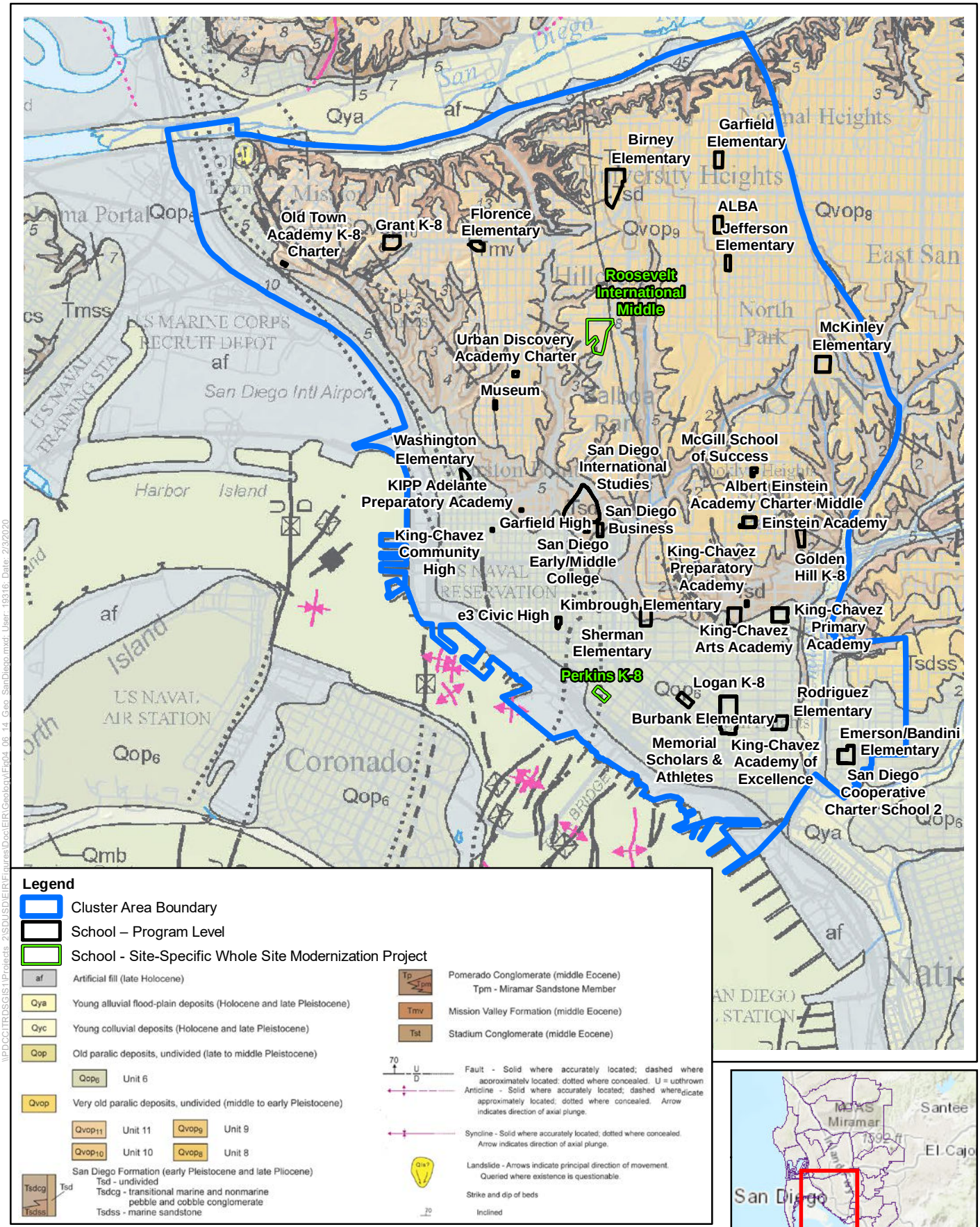

Source: Ninyo & Moore (2019)

**Figure 4.6-12**
**Geology - Morse Cluster Area**




Source: Ninyo & Moore (2019)

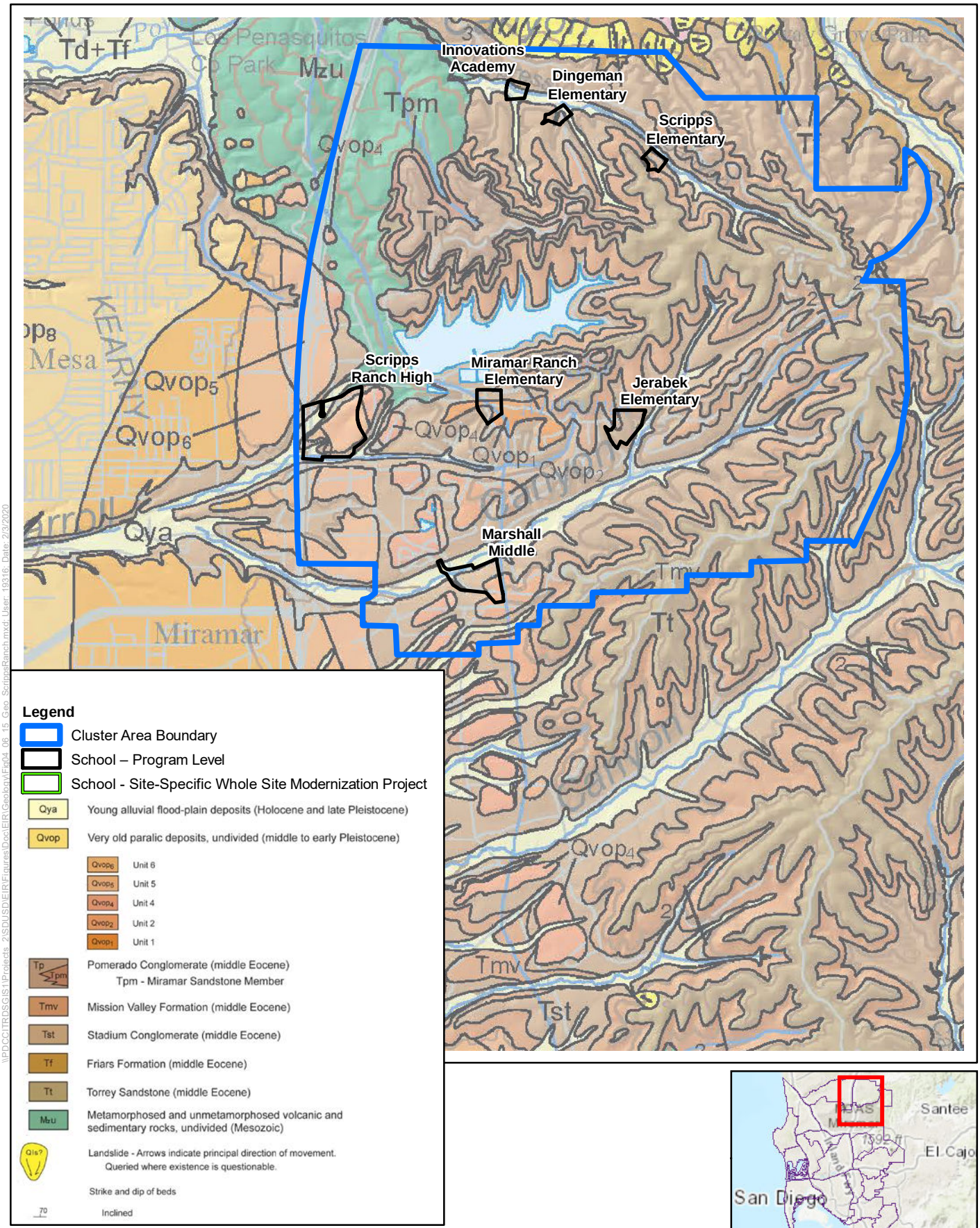
**Figure 4.6-13**
**Geology - Point Loma Cluster Area**

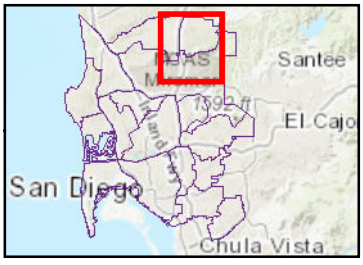



Source: Ninyo & Moore (2019)

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**Figure 4.6-14**
**Geology - San Diego Cluster Area**



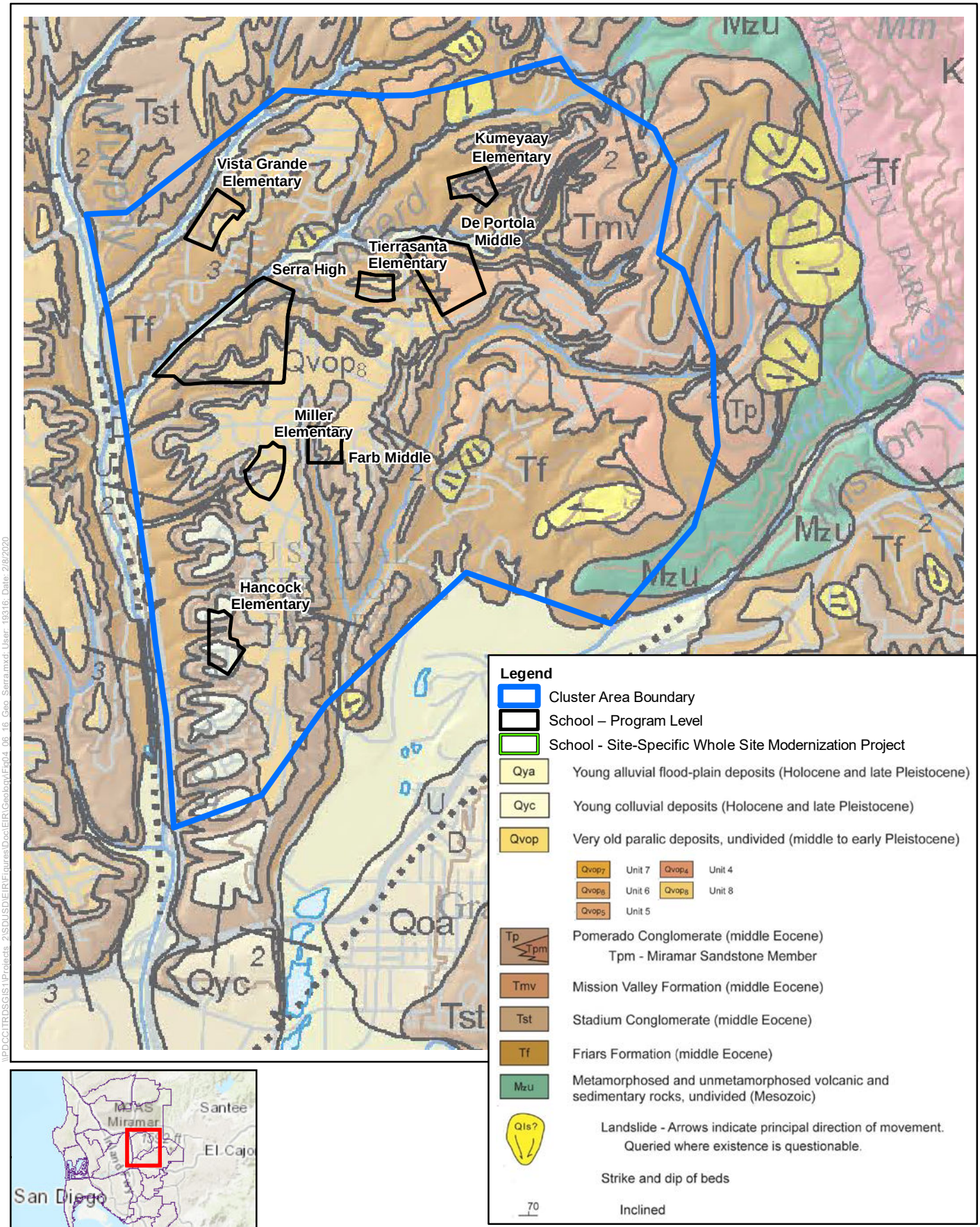



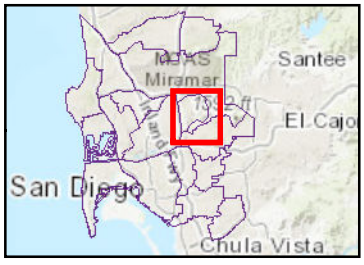

Source: Ninyo & Moore (2019)

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**Figure 4.6-15**
**Geology - Scripps Ranch Cluster Area**



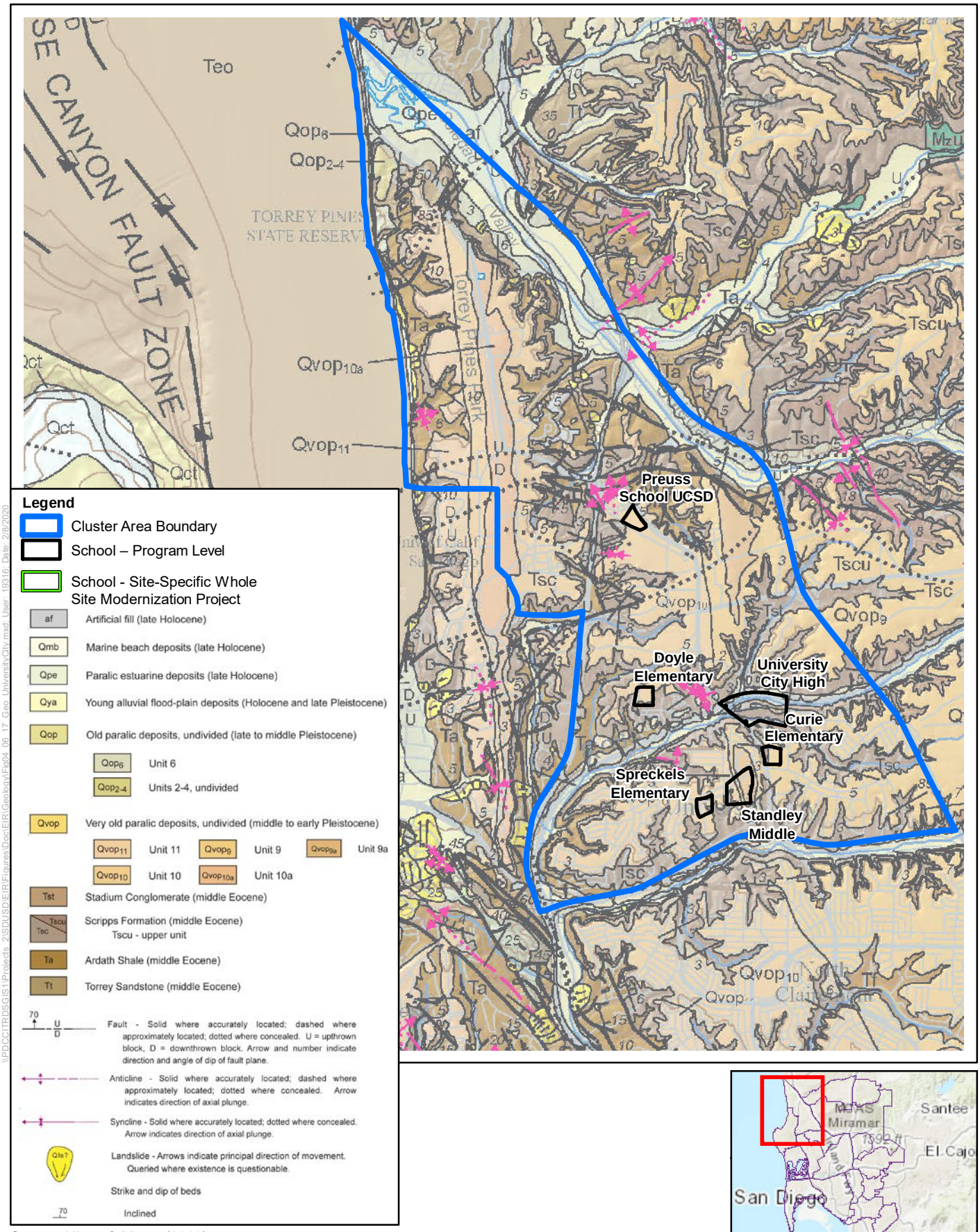




Source: Ninyo & Moore (2019)

0 0.5 1 Miles

N

**Figure 4.6-16**
**Geology - Serra Cluster Area**




Source: Ninyo & Moore (2019)

**Figure 4.6-17**
**Geology - University City Cluster Area**

# 4.6.2.2 Geologic Hazards

## Faulting and Seismicity

Of all the geological hazards, those that pose the highest potential for causing widespread damage are seismic hazards. All of San Diego County is located within Seismic Zone 4 (Section 1629.4.1 of the California Building Code [CBC]), which is the highest rating and, like most of Southern California, is subject to ground shaking. Active faults in the region include segments of the San Jacinto, Elsinore, and Rose Canyon fault zones. Figure 4.6-1 illustrates the location of various faults in the region.

The Rose Canyon fault zone is the closest major fault system to the Program area, and active fault segments are mapped within the Clairemont cluster, the La Jolla cluster, the Mission Bay cluster, the Point Loma cluster, and the San Diego cluster. Strands of this fault zone have been mapped within San Diego Bay, downtown San Diego, Harbor Island, and through the San Diego International Airport. Portions have been designated by the State of California as being Earthquake Fault (Alquist-Priolo) Zones. The Rose Canyon fault zone is the onshore portion of a more extensive fault zone that includes the Offshore Zone of Deformation and the Newport-Inglewood fault to the north, and several possible extensions southward, both onshore and offshore. The Rose Canyon fault zone consists of predominantly right-lateral strike-slip faults that extend south-southeast through the San Diego metropolitan area. Various fault strands display strike-slip, normal, oblique, or reverse components of displacement. The fault zone extends offshore at La Jolla and continues north-northwest subparallel to the coastline.

Several faults considered "potentially active, inactive, presumed inactive, or activity unknown" are also mapped within the Program area. These faults are not considered active by the State of California. These faults are mapped within the Clairemont cluster, the Crawford cluster, the Henry cluster, the Hoover cluster, the Kearny cluster, the La Jolla cluster, the Lincoln cluster, the Madison cluster, the Mira Mesa cluster, the Mission Bay cluster, the Morse cluster, the Point Loma cluster, the San Diego cluster, the Serra cluster, and the University City cluster.

In general, hazards associated with seismic activity include ground surface rupture, strong ground motion, and liquefaction, as discussed below.

## Surface Ground Rupture

The active Rose Canyon Fault Zone crosses the western portion of the Program area, and, thus, the probability of damage from surface ground rupture is considered to be high. Additionally, lurching or cracking of the ground surface as a result of nearby seismic events is possible. Portions of the Program area are located within the Alquist-Priolo Fault Zone and the Downtown Special Fault Zone. Accordingly, the potential for ground rupture due to faulting within certain clusters is considered possible. These clusters include Clairemont, La Jolla, Mission Bay, Point Loma, and San Diego.

## Liquefaction and Seismically Induced Settlement

Liquefaction is the phenomenon in which loosely deposited, saturated granular soils (located below the water table) with clay contents (particles less than 0.005 millimeters) of less than 15%, liquid limit of less than 35%, and natural moisture content greater than 90% of the liquid limit undergo rapid loss of shear strength due to development of excess pore pressure during strong earthquake-induced ground shaking. Ground shaking of sufficient duration results in the loss of grain-to-grain

contact due to rapid rise in pore water pressure, and it eventually causes the soil to behave as a fluid for a short period of time. Liquefaction is known generally to occur in saturated or near-saturated cohesionless soils at depths shallower than 50 feet below grade. Factors known to influence liquefaction potential include composition and thickness of soil layers, grain size, relative density, groundwater level, degree of saturation, and both intensity and duration of ground shaking.

Lateral spreading occurs as the generation of pore-water pressure in the soil resulting from earthquake shaking reduces the stiffness and strength of the soil. Mitigation of lateral spreading hazards usually involves densification, reinforcement, or cementation of the liquefaction-susceptible soil.

The 2016 CBC specifies that the potential for liquefaction and soil strength loss be evaluated, where applicable, for the Maximum Considered Earthquake Geometric Mean (MCEG) peak ground acceleration with adjustment for site class effects in accordance with the American Society of Civil Engineers (ASCE) 7-10 Standard. The MCEG peak ground acceleration is based on the geometric mean peak ground acceleration with a 2% probability of exceedance in 50 years. The MCEG peak ground acceleration with adjustment for site class effects can be calculated using the Structural Engineers Association of California and Office of Statewide Health Planning and Development seismic design tool (web-based). Mapped MCEG peak ground acceleration, the site coefficient, and the Site Class is anticipated to vary within each cluster. Geotechnical/Geohazards Investigation Requirements identified in Part D of the District's *Architect's Professional Services Manual* (see Section 4.6.3.3, *Local*), dictate requirements for the geological investigation/reconnaissance and preliminary soils investigation, including identification of soil strength and the potential for liquefaction for the District's school sites, and provides conclusions and recommendations regarding the potential for liquefaction and soil strength to the District for their sites.

As noted above and identified on Figures 4.6-18 through 4.6-33, based on a review of background materials, including the *City of San Diego Seismic Safety Study, Geologic Hazards and Faults* maps (City of San Diego 2008), the following clusters contain mapped areas with a high potential for liquefaction: Clairemont, Henry, Hoover, Kearny, Lincoln, Mira Mesa, Mission Bay, Point Loma, San Diego, Serra, and University City. These clusters contain mapped areas with a low potential for liquefaction: Clairemont, Crawford, Henry, Hoover, Kearny, La Jolla, Lincoln, Madison, Mira Mesa, Mission Bay, Point Loma, San Diego, Scripps Ranch, Serra, and University City.

## Landslides/Slope Erosion

Many clusters contain mapped landslides and/or are mapped as being susceptible to landsliding. The following clusters contain mapped landslides or are susceptible to landslides: Clairemont, Henry, Kearny, La Jolla, Lincoln, Madison, Mira Mesa, Mission Bay, Morse, Point Loma, San Diego, Scripps Ranch, Serra, and University City, as shown on Figures 4.6-18 through 4.6-33 (City of San Diego 2008, Tan 1995). While the Lincoln cluster does not contain any mapped landslides, it is identified as susceptible to landslides (Tan 1995). Many clusters also contain mapped areas of slope and coastal bluff erosion, although all 16 clusters contain soils with varying degrees of soil erosion potential. Table 1 in Appendix G provides details concerning each of the soil types and level of susceptibility to soil erosion.

## Subsidence

Ground subsidence results from fluid (water or petroleum) extraction from underlying formations, which causes the collapse of pore spaces previously occupied by the removed fluid (County of San Diego 2010). The collapse of these pore spaces compacts these underlying formations, leading to a gradual drop in ground surface elevation. Ground subsidence is most often found where large volumes of fluids from underground reservoirs have been or are being withdrawn. Ground shaking from tectonic activity can exacerbate the vertical sinking of land in an area over the withdrawal site. Underlying geologic formations within San Diego County have a low potential of subsidence, and there are no historical records of subsidence events in San Diego County (County of San Diego 2010, USGS 2019).

## Soil Hazards

Structures built on unstable soils—such as expansive, corrosive, or compressible/collapsible soils—without proper controls can be damaged or otherwise distressed. It is anticipated these soil hazards may be present throughout the Program area. The *City of San Diego Seismic Safety Study Geologic Hazards and Faults* (2008) provides a map and a matrix composed of 54 grids that identify all soil hazards within the City. Subsurface investigation and laboratory testing can confirm the presence of these soils hazards at a particular site, and a brief description of each is provided below.

### Expansive Soils

Expansive soils generally result from specific clay minerals that have the capacity to shrink or swell in response to changes in moisture content. Shrinking or swelling of foundation soils can lead to damage to foundations and engineered structures, including tilting and cracking. Clayey fill soils, alluvium, marine deposits, or old paralic deposits may also be moderately expansive. Expansive soils can undergo a significant increase in volume with an increase in water content or, conversely, a significant decrease in volume with a decrease in water content. Changes in the water content of an expansive soil can result in severe distress to structures built upon it. Although both expansive and liquefiable soil conditions are influenced by the presence of groundwater, soil expansion differs from soil liquefaction in that soil expansion is not seismically induced. Table 18-1-B of the Uniform Building Code provides a classification for expansive soils utilizing an expansion index and the associated potential for expansion. For example, an expansion index of 0–20 has a very low potential for expansion, while an expansion index of 91–130 has a high potential for expansion.

### Corrosive Soils

Caltrans corrosion criteria define corrosive soils as those with more than 500 parts per million (ppm) chlorides, more than 0.2% sulfates, or a pH less than 5.5. Based on the coastal location of numerous clusters and this Caltrans corrosion criteria, soils in the Program area may be classified as corrosive. Corrosive soils contain chemical constituents that can react with construction materials, such as concrete and ferrous metals, that may damage foundations and buried pipelines. Electrical resistivity, chloride content, and pH level are indicators of the soil's tendency to corrode ferrous metals.

### Compressible/Collapsible Soils

Compressible soils are generally composed of soils that undergo consolidation when exposed to new loading, such as fill or foundation loads. Soil collapse is a phenomenon where the soils undergo

a significant decrease in volume upon increase in moisture content, with or without an increase in external loads. Buildings, structures and other improvements may be subject to excessive settlement-related distress when compressible soils or collapsible soils are present.

### 4.6.2.3 Geologic Hazards Mapping

Per the *City of San Diego Safety Study, Geologic Hazards and Faults* (2008) and the Landslide Hazards in the Southern Part of the San Diego Metropolitan Area, San Diego County, California, Landslide Hazard Identification Map No. 33 (1995), the Program area's 16 clusters are mapped within a variety of Geologic Hazard Categories. Table 4.6-2 identifies geologic hazards within the clusters and describes the City of San Diego's Geologic Hazard Categories underlying each of the clusters. Figures 4.6-18 through 4.6-33 illustrate the various geologic hazards, including identified or inferred faults, within each cluster.

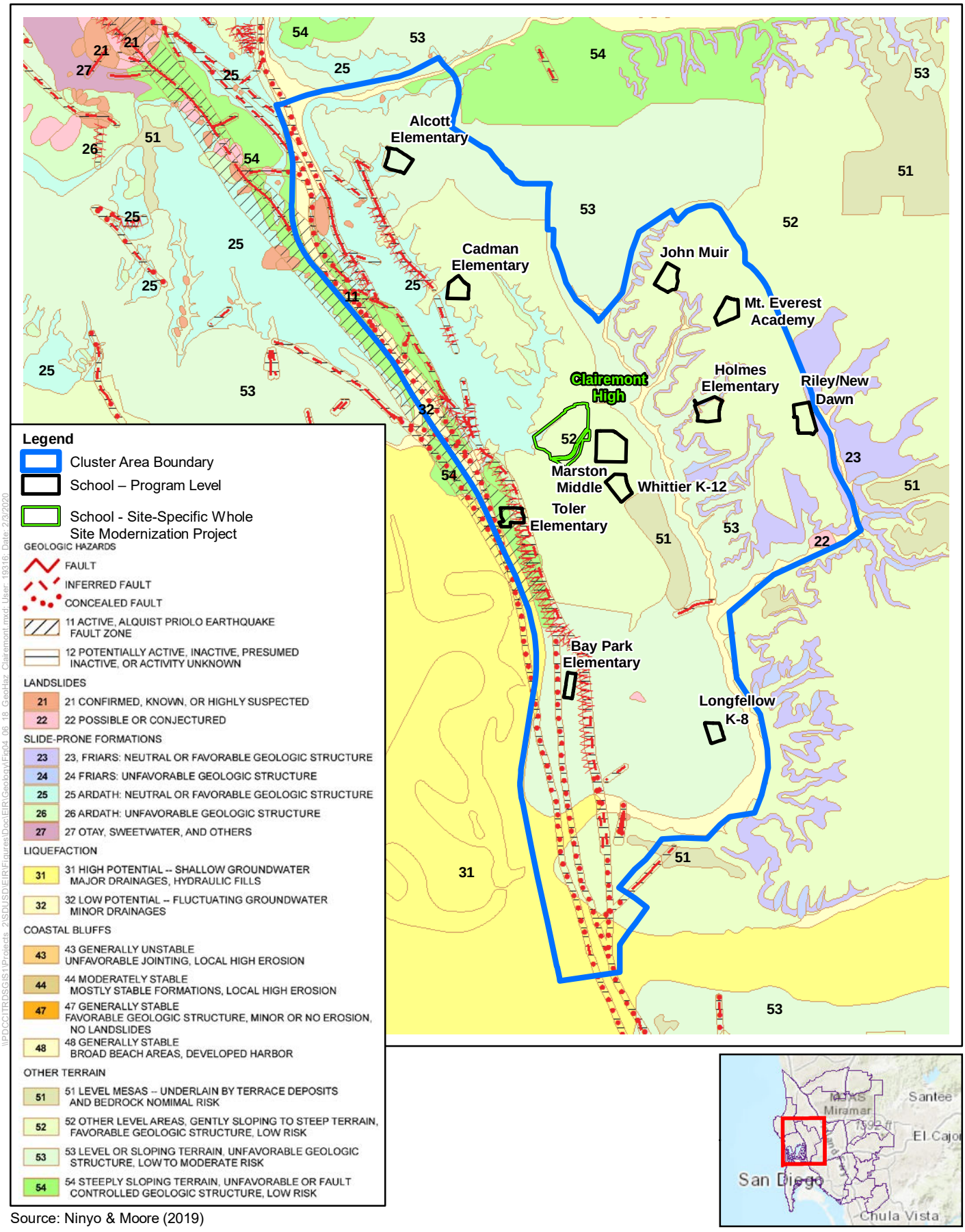
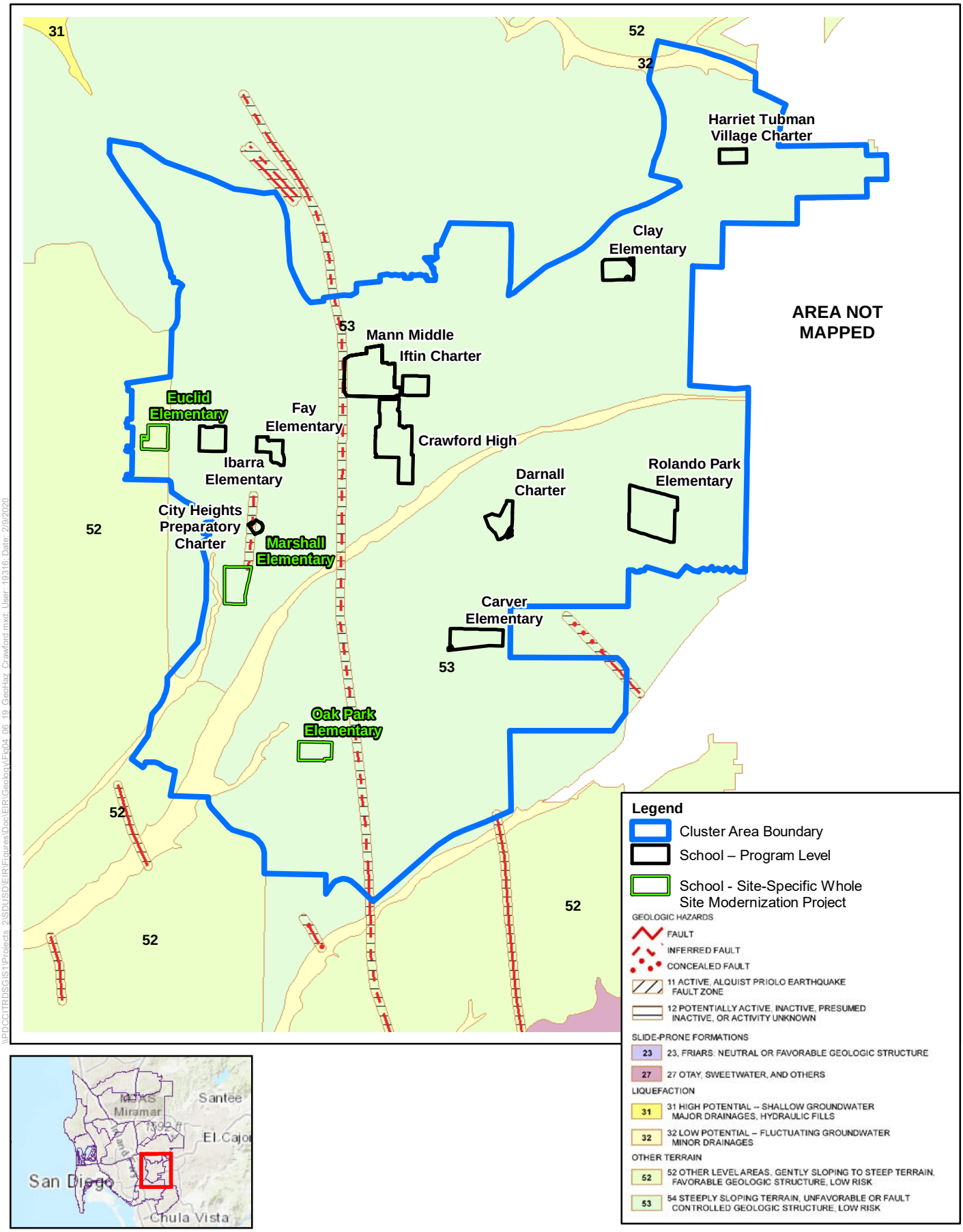
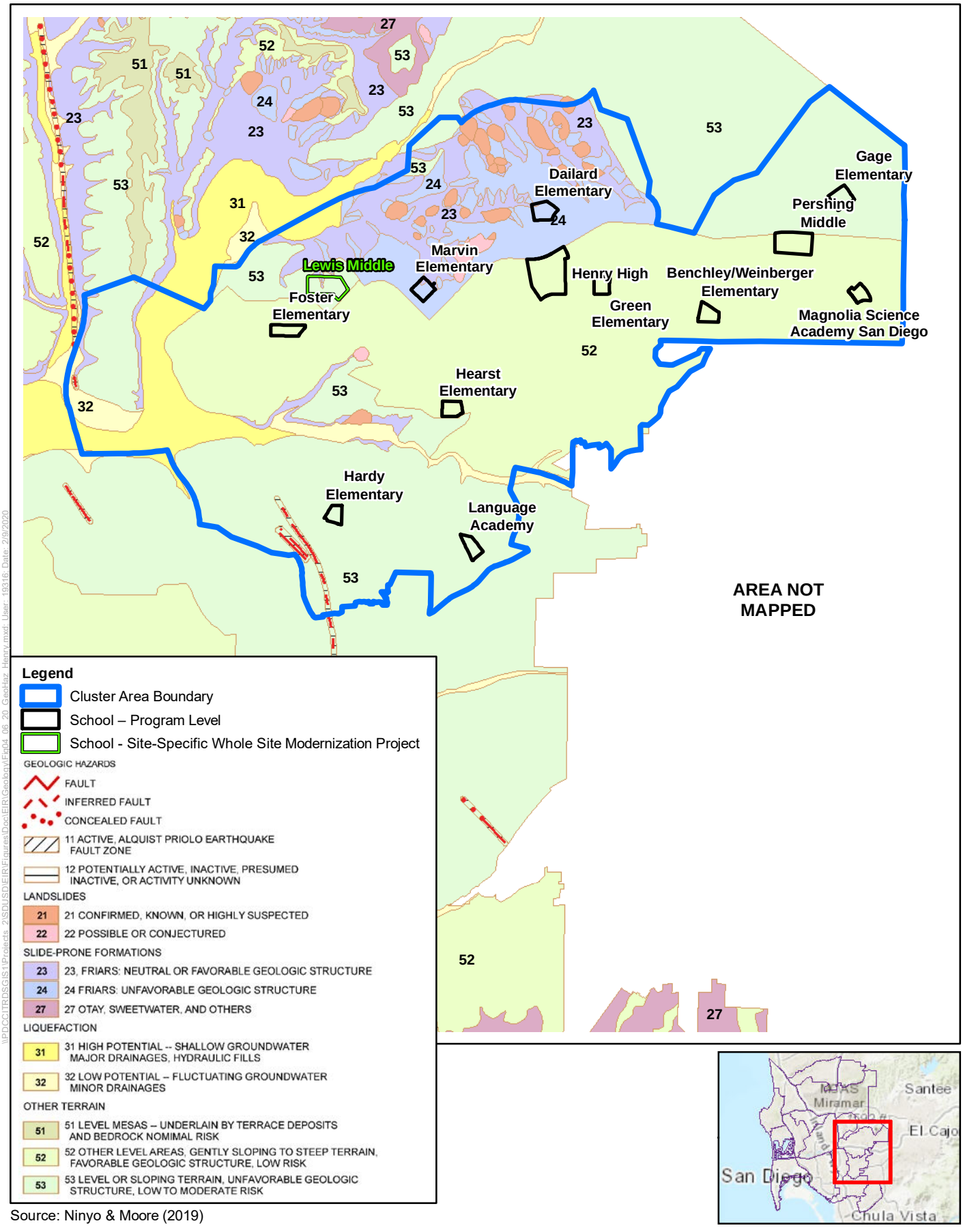



**Figure 4.6-18**
**Geologic Hazards - Clairemont Cluster Area**



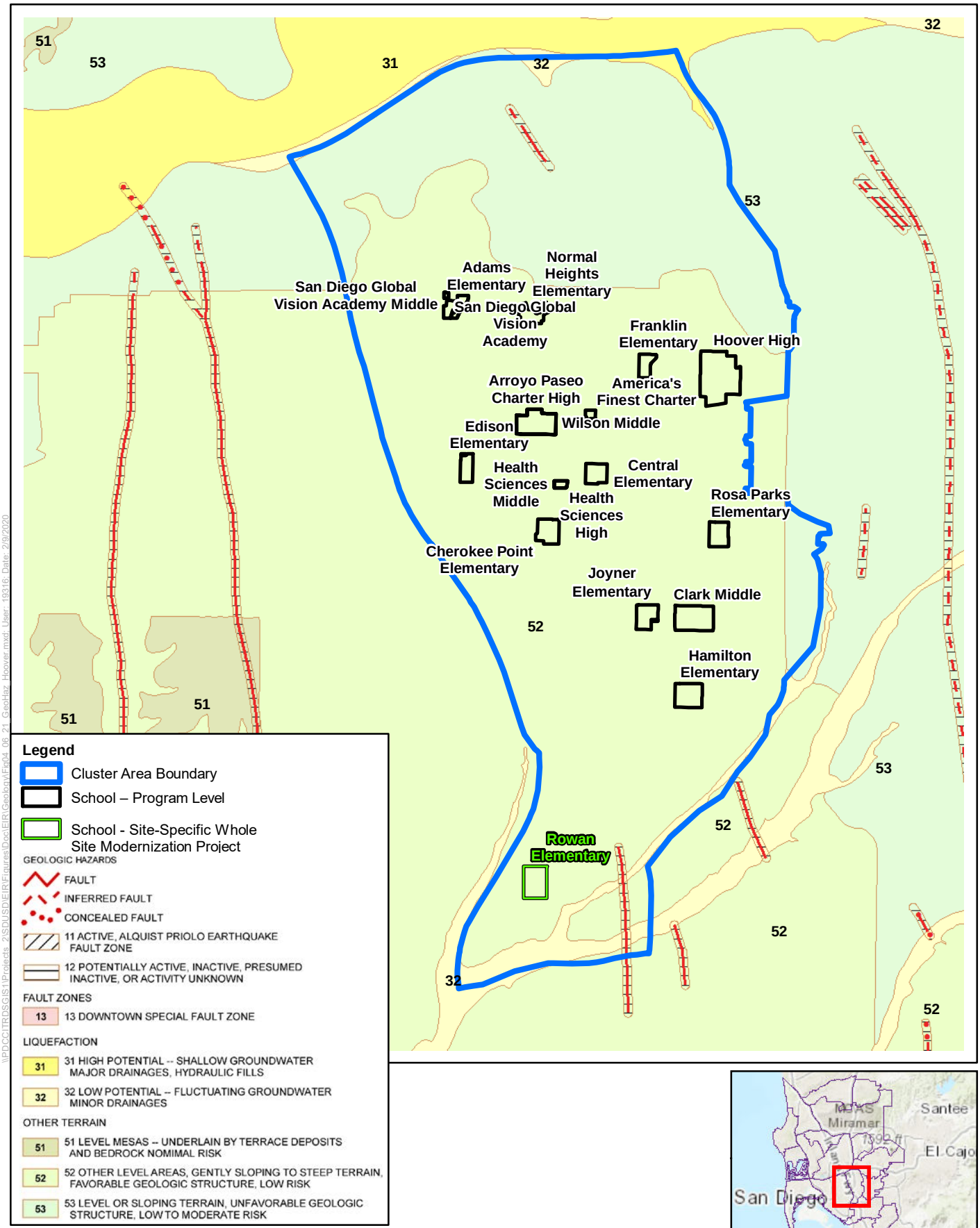

Source: Ninyo & Moore (2019)

**Figure 4.6-19**
**Geologic Hazards - Crawford Cluster Area**



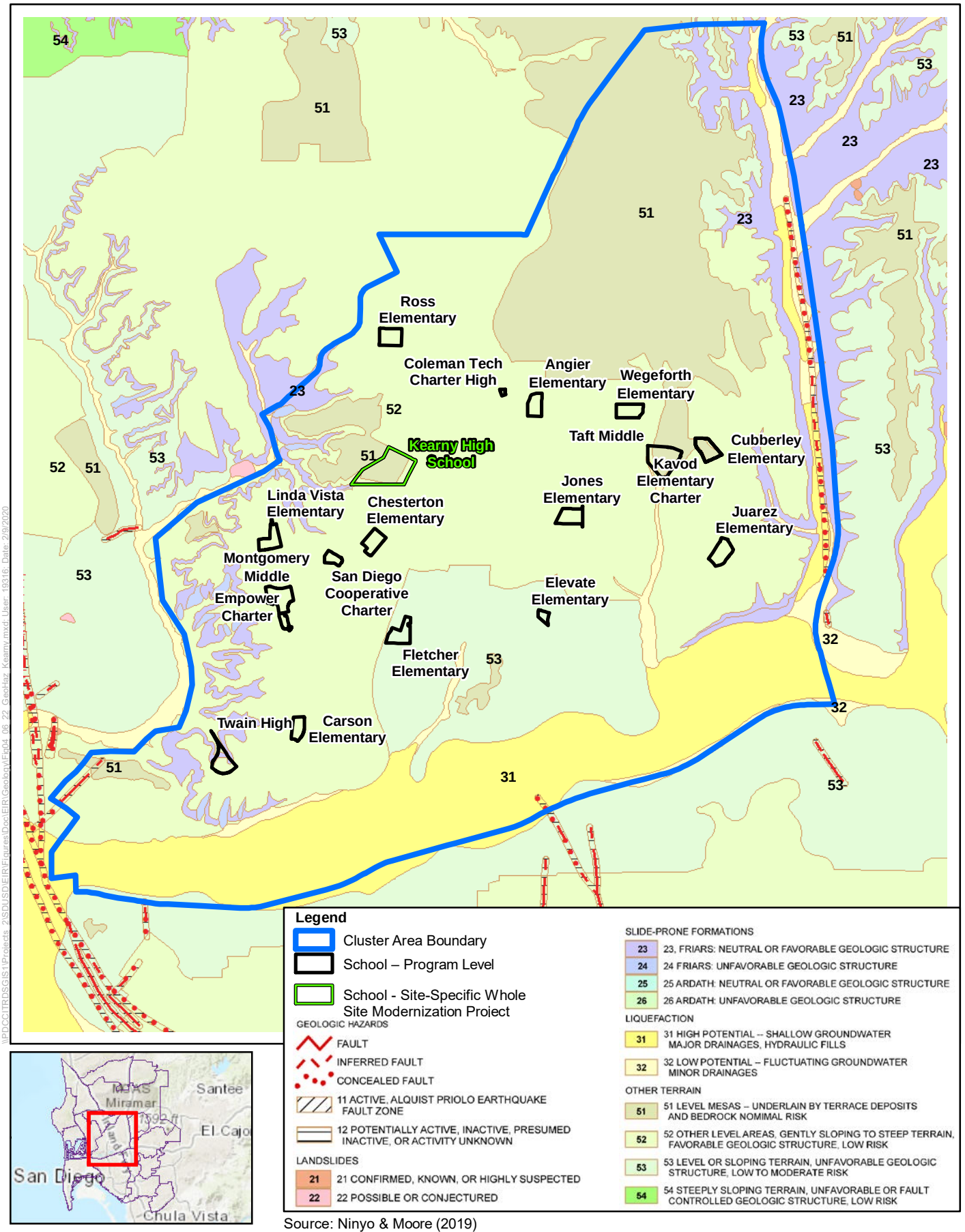

Source: Ninyo & Moore (2019)

**Figure 4.6-20**
**Geologic Hazards - Henry Cluster Area**



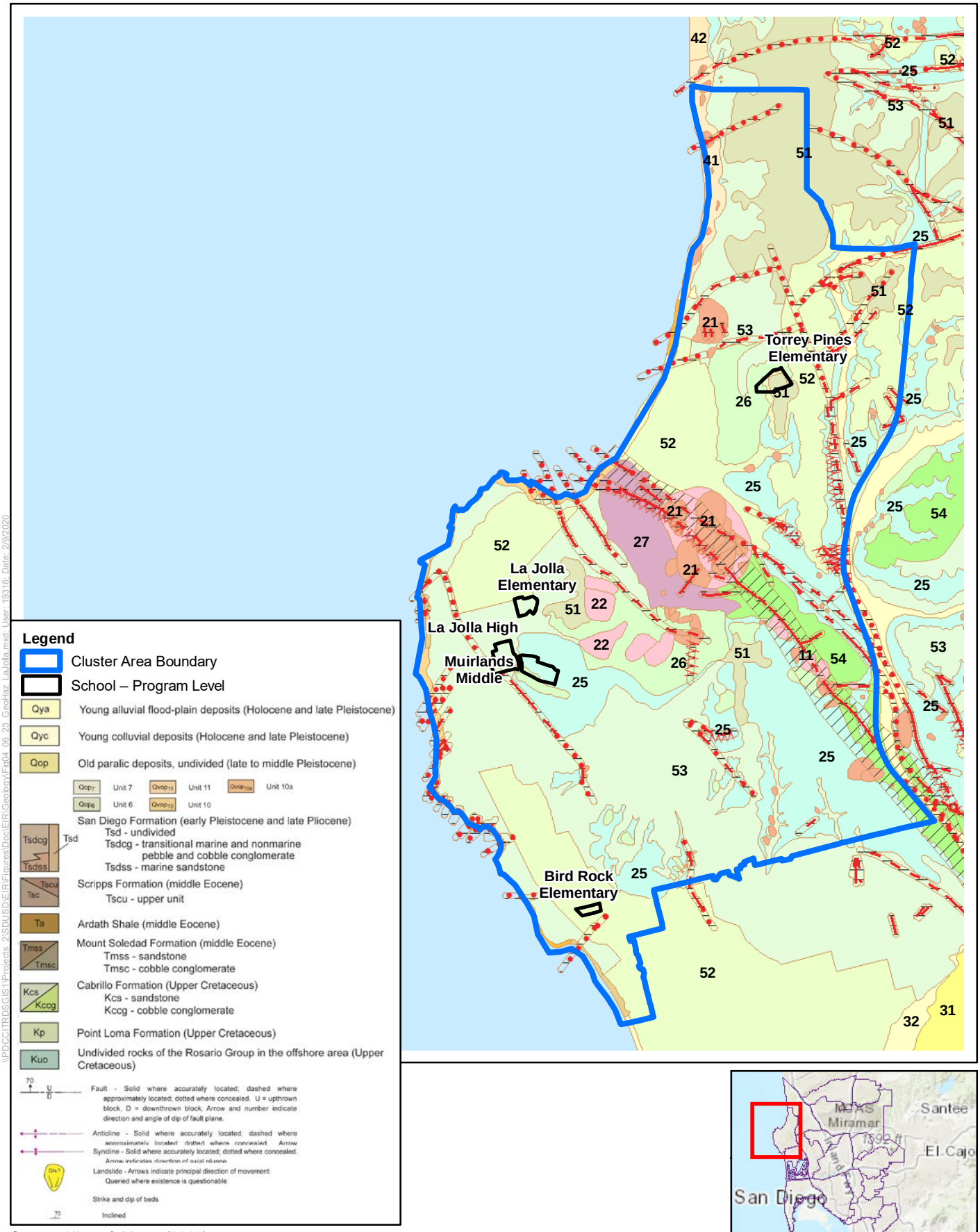

Source: Ninyo & Moore (2019)

**Figure 4.6-21**
**Geologic Hazards - Hoover Cluster Area**



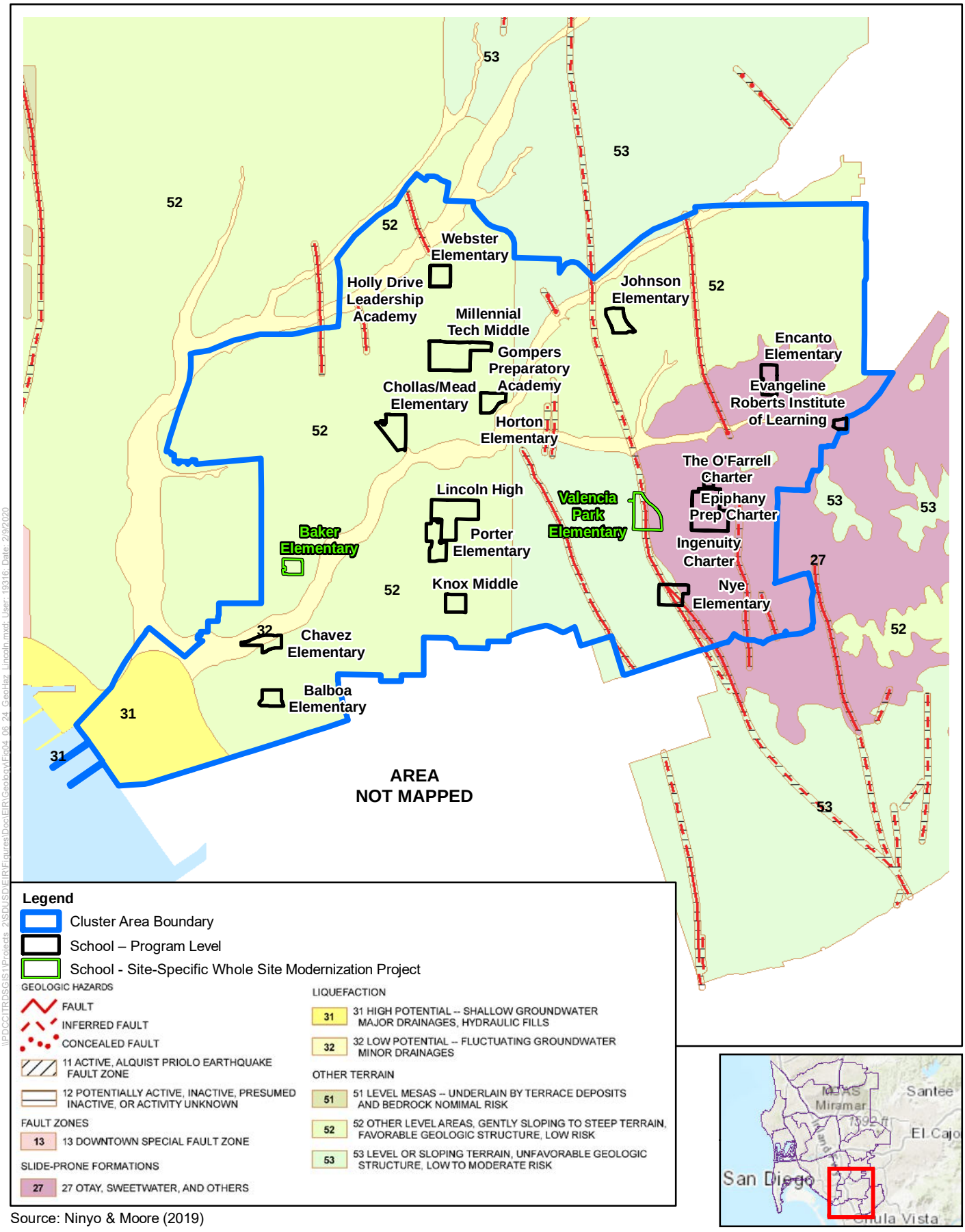

Source: Ninyo & Moore (2019)

**Figure 4.6-22**
**Geologic Hazards - Kearny Cluster Area**



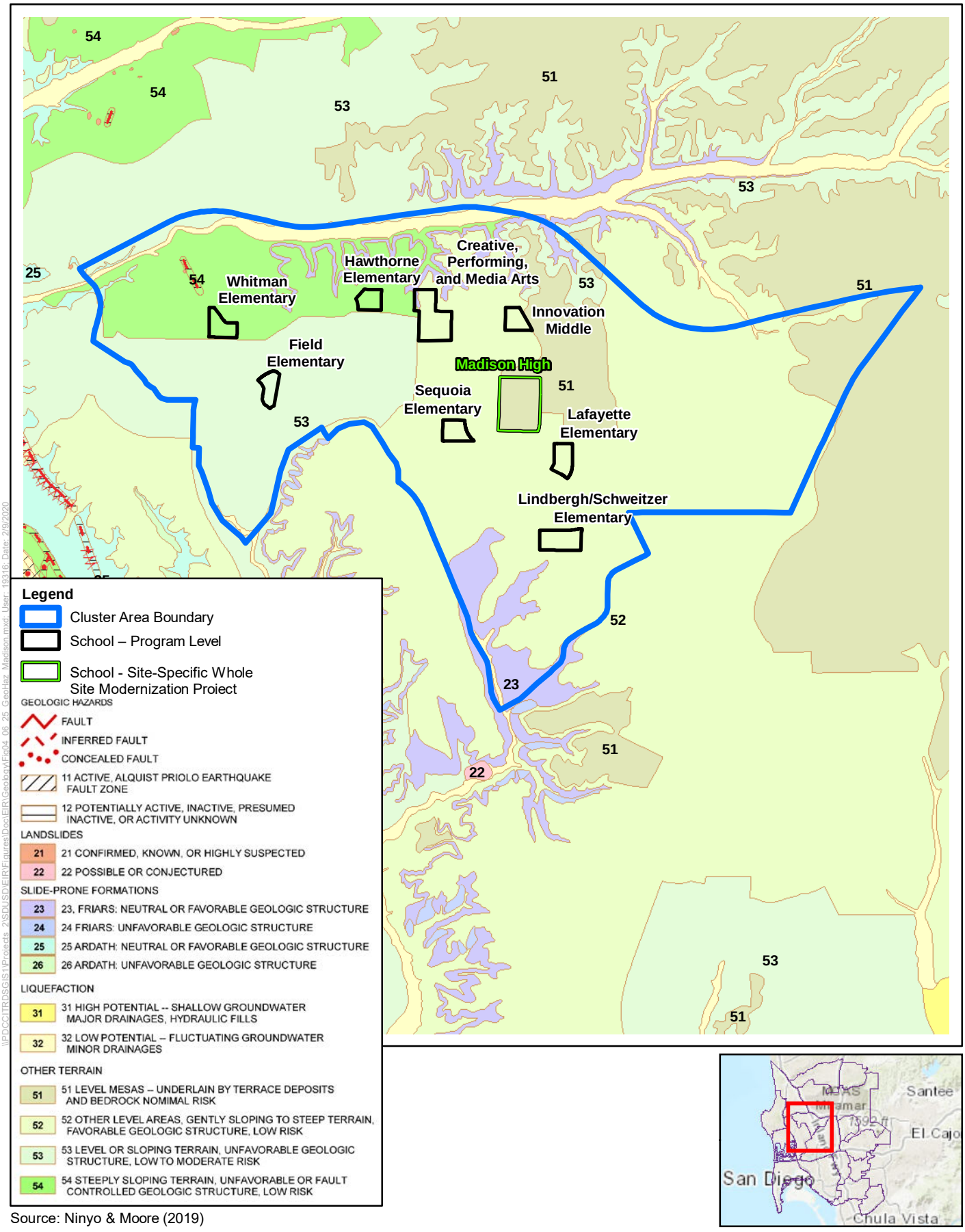

Source: Ninyo & Moore (2019)

**Figure 4.6-23**
**Geologic Hazards - La Jolla Cluster Area**




Source: Ninyo & Moore (2019)

**Figure 4.6-24**
**Geologic Hazards - Lincoln Cluster Area**





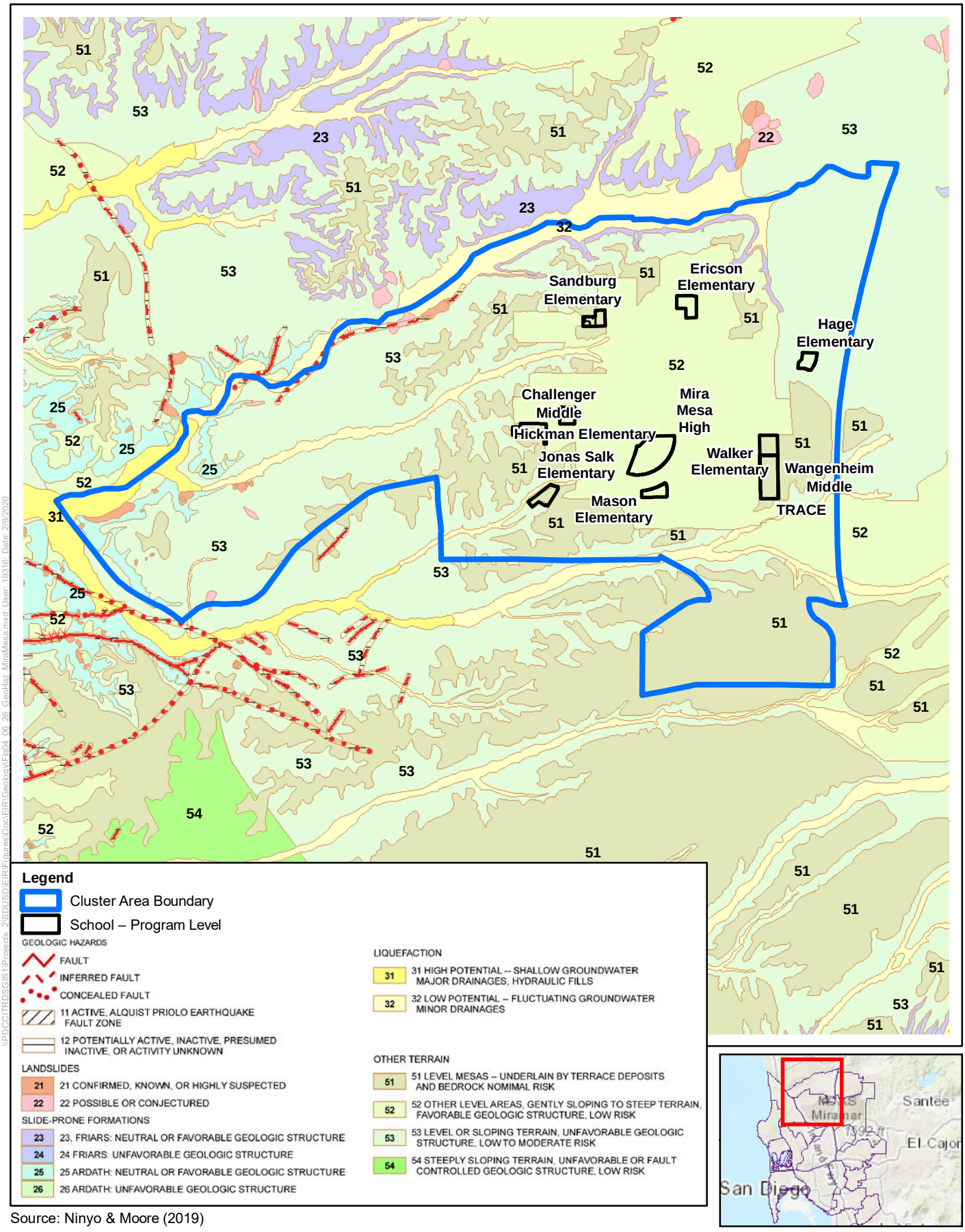


Source: Ninyo & Moore (2019)

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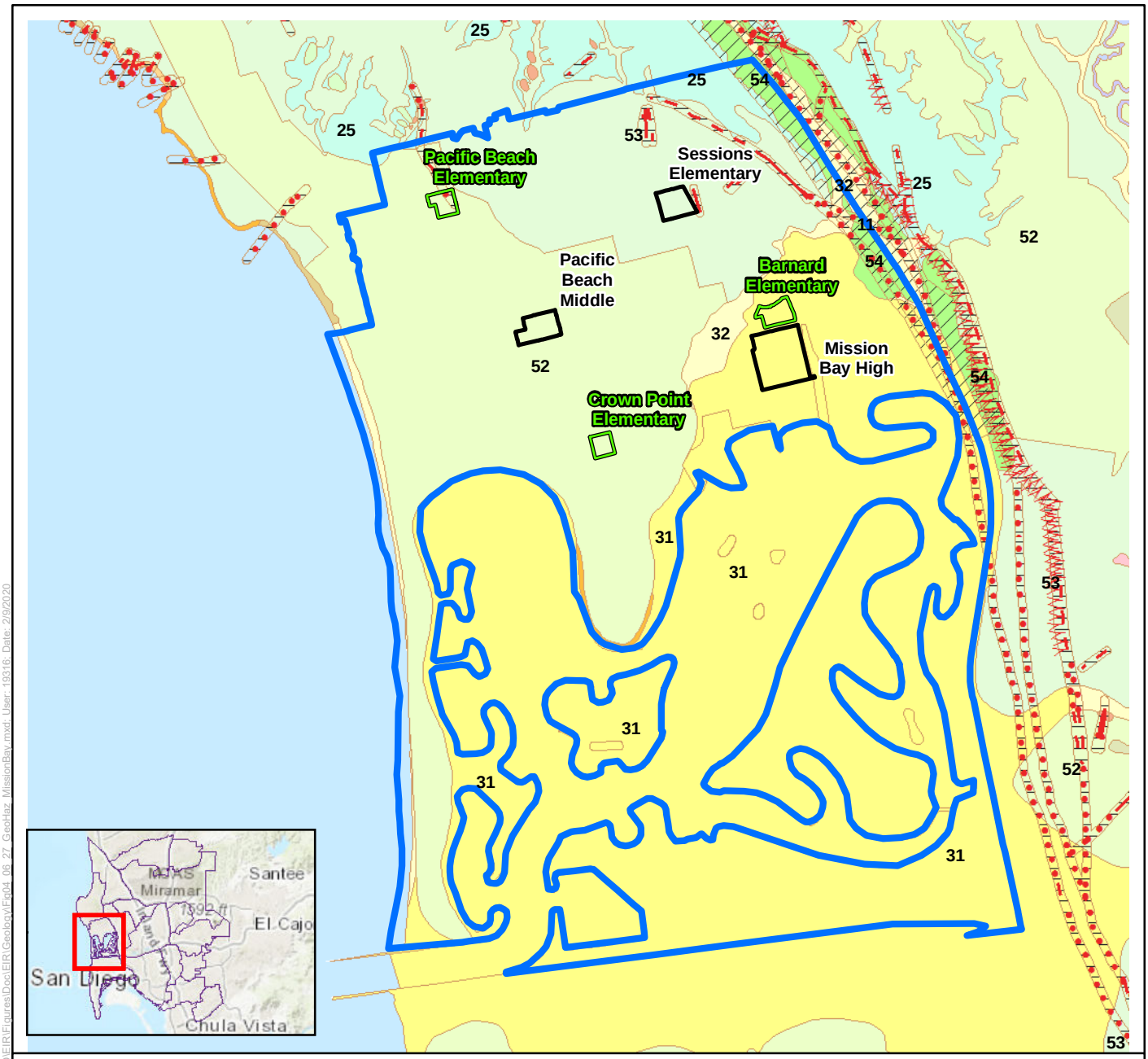
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**Figure 4.6-25**
**Geologic Hazards - Madison Cluster Area**




Source: Ninyo & Moore (2019)

**Figure 4.6-26**
**Geologic Hazards - Mira Mesa Cluster Area**




**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

GEOLOGIC HAZARDS

- FAULT
- INFERRED FAULT
- CONCEALED FAULT
- 11 ACTIVE, ALQUIST PRIOLO EARTHQUAKE FAULT ZONE
- 12 POTENTIALLY ACTIVE, INACTIVE, PRESUMED INACTIVE, OR ACTIVITY UNKNOWN

LANDSLIDES

- 21 CONFIRMED, KNOWN, OR HIGHLY SUSPECTED

SLIDE-PRONE FORMATIONS

- 23 — 23, FRIARS: NEUTRAL OR FAVORABLE GEOLOGIC STRUCTURE
- 24 — 24 FRIARS: UNFAVORABLE GEOLOGIC STRUCTURE
- 25 — 25 ARDATH: NEUTRAL OR FAVORABLE GEOLOGIC STRUCTURE
- 26 — 26 ARDATH: UNFAVORABLE GEOLOGIC STRUCTURE

LIQUEFACTION

- 31 — 31 HIGH POTENTIAL -- SHALLOW GROUNDWATER MAJOR DRAINAGES, HYDRAULIC FILLS
- 32 — 32 LOW POTENTIAL – FLUCTUATING GROUNDWATER MINOR DRAINAGES

COASTAL BLUFFS

- 43 — 43 GENERALLY UNSTABLE UNFAVORABLE JOINTING, LOCAL HIGH EROSION
- 44 — 44 MODERATELY STABLE MOSTLY STABLE FORMATIONS, LOCAL HIGH EROSION
- 47 — 47 GENERALLY STABLE FAVORABLE GEOLOGIC STRUCTURE, MINOR OR NO EROSION, NO LANDSLIDES
- 48 — 48 GENERALLY STABLE BROAD BEACH AREAS, DEVELOPED HARBOR

OTHER TERRAIN

- 51 — 51 LEVEL MESAS -- UNDERLAIN BY TERRACE DEPOSITS AND BEDROCK NOMIMAL RISK
- 52 — 52 OTHER LEVEL AREAS, GENTLY SLOPING TO STEEP TERRAIN, FAVORABLE GEOLOGIC STRUCTURE, LOW RISK
- 53 — 53 LEVEL OR SLOPING TERRAIN, UNFAVORABLE GEOLOGIC STRUCTURE, LOW TO MODERATE RISK
- 54 — 54 STEEPLY SLOPING TERRAIN, UNFAVORABLE OR FAULT CONTROLLED GEOLOGIC STRUCTURE, LOW RISK

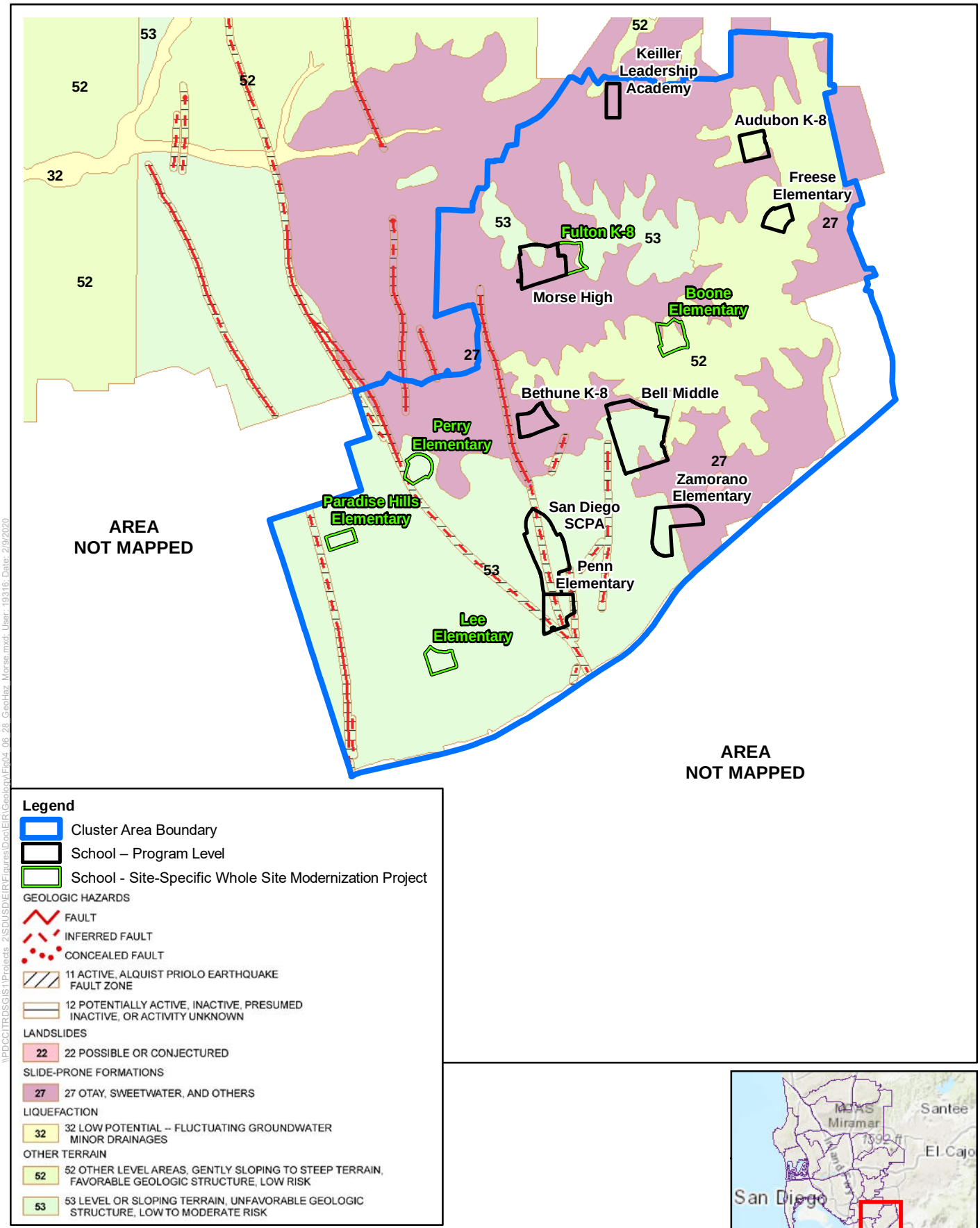
Source: Ninyo & Moore (2019)

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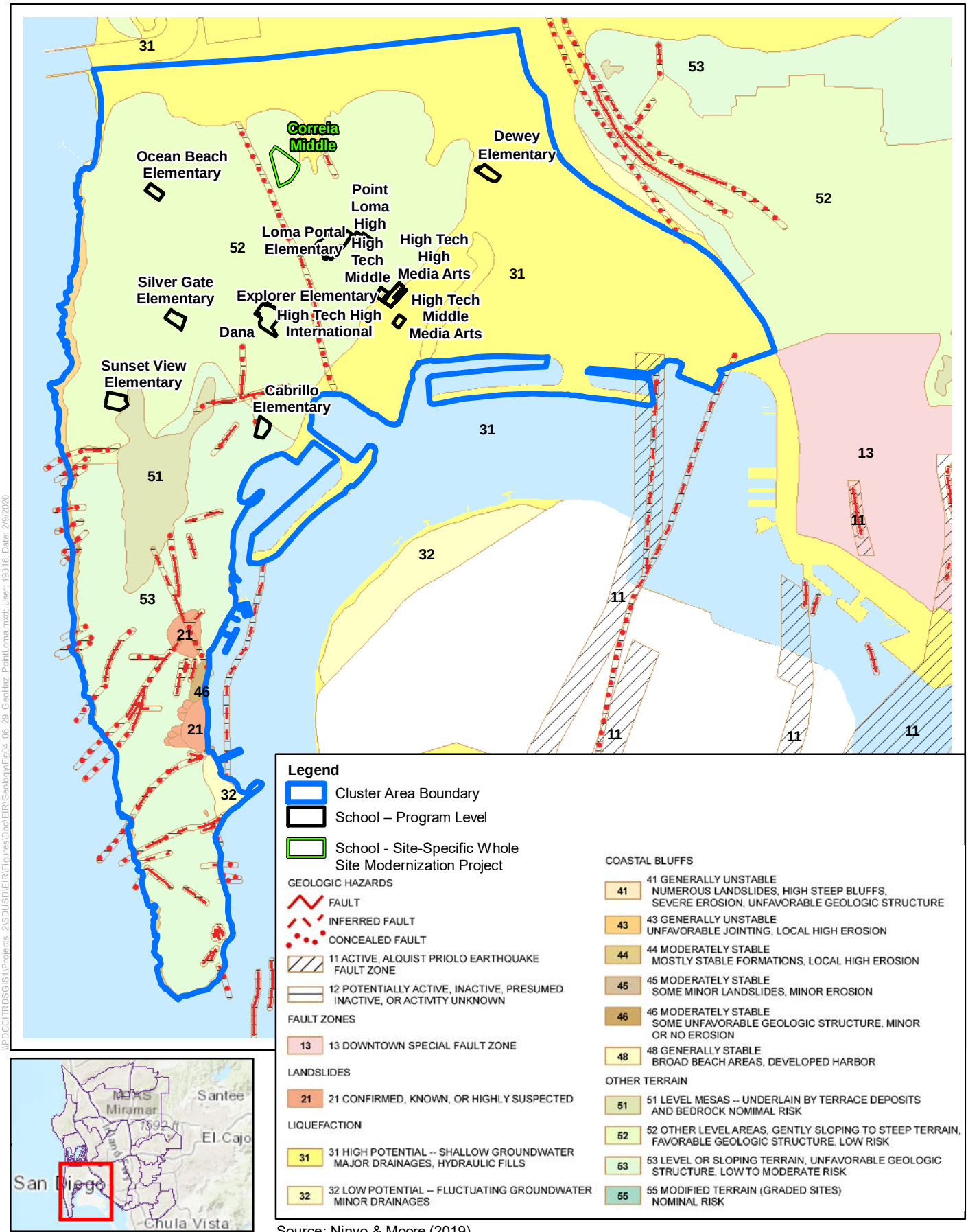
**Figure 4.6-27**
**Geologic Hazards - Mission Bay Cluster Area**

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Source: Ninyo & Moore (2019)

**Figure 4.6-28**
**Geologic Hazards - Morse Cluster Area**



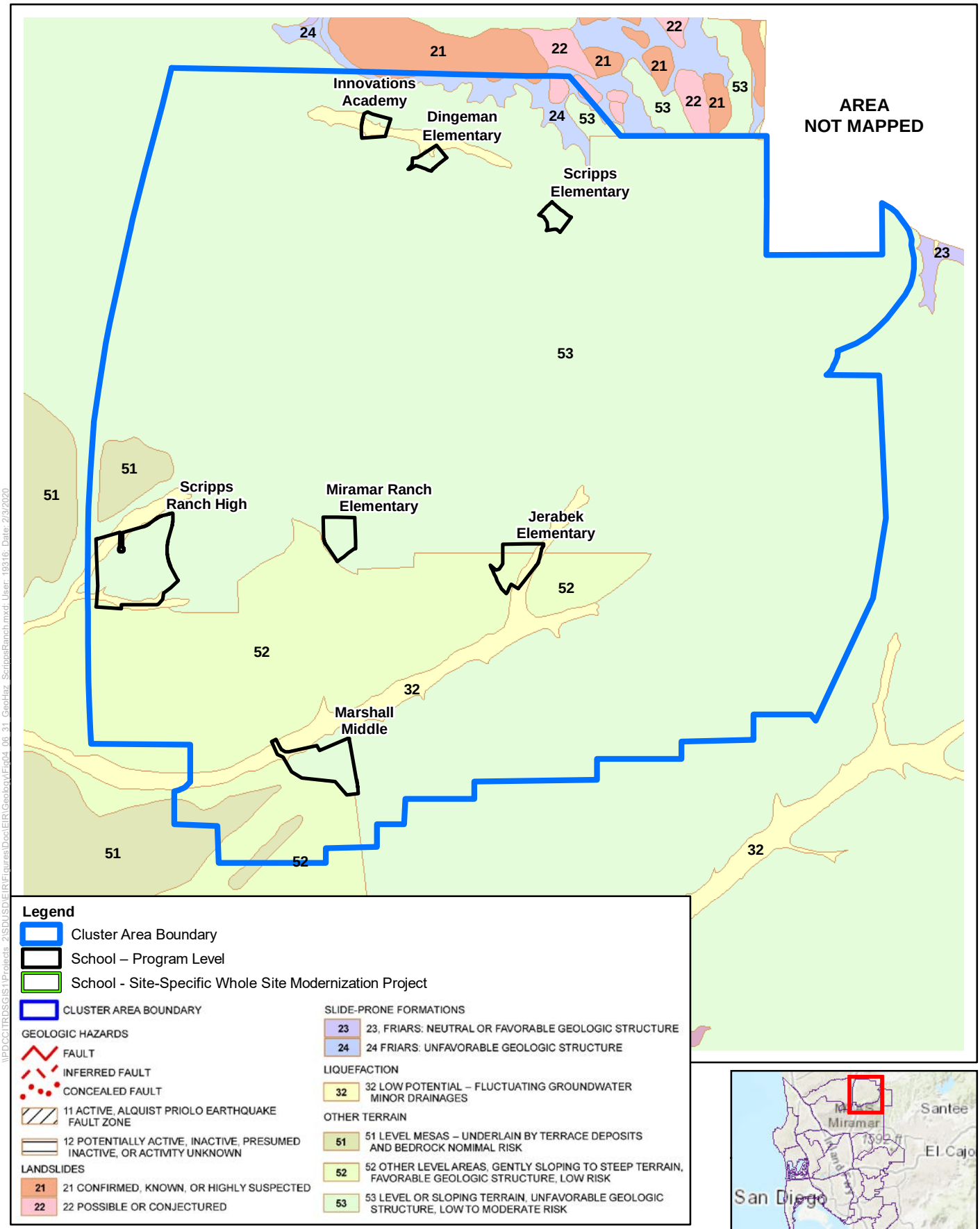

Source: Ninyo & Moore (2019)

**Figure 4.6-29**
**Geologic Hazards - Point Loma Cluster Area**



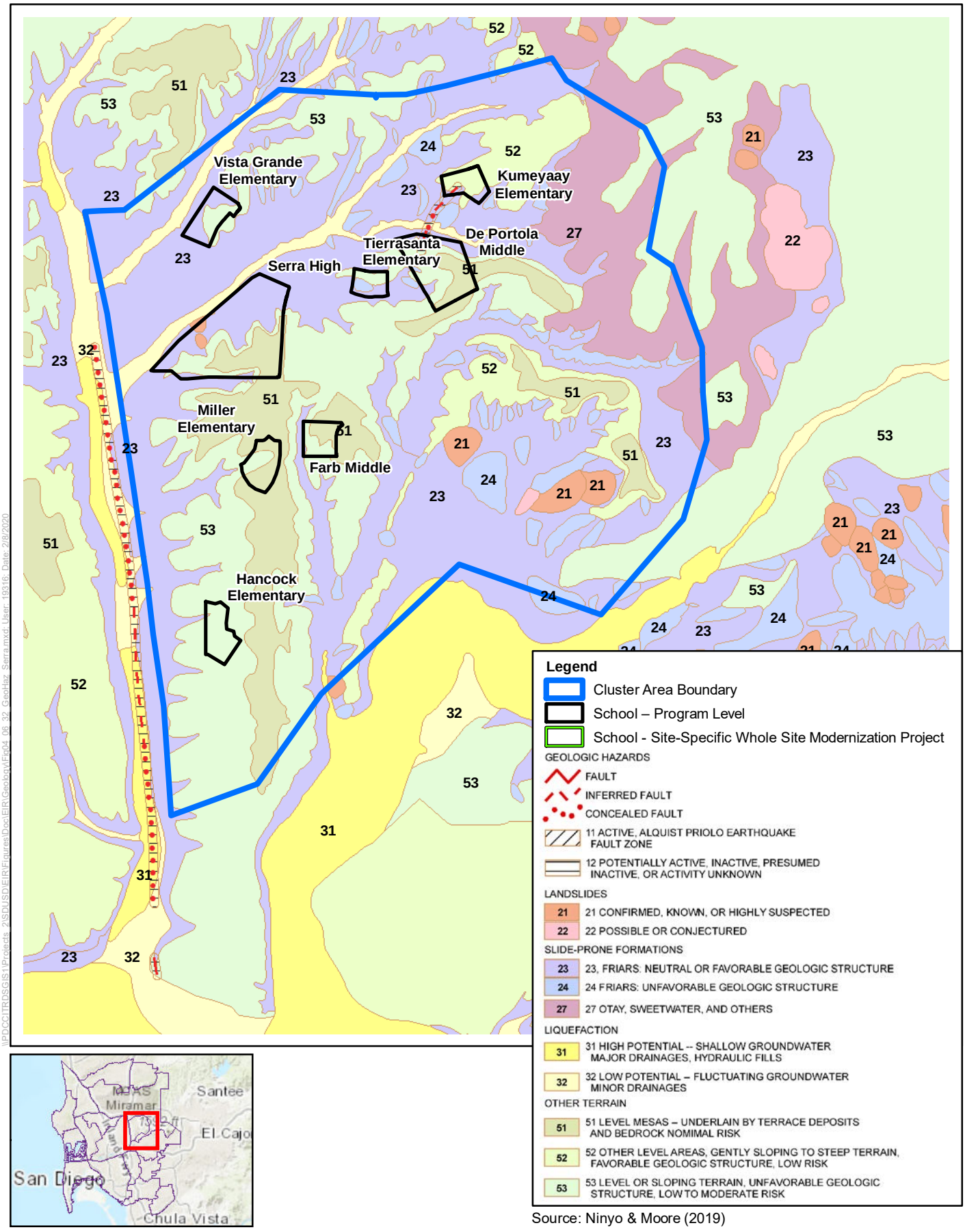

Source: Ninyo & Moore (2019)

**Figure 4.6-30**
**Geologic Hazards - San Diego Cluster Area**




Source: Ninyo & Moore (2019)

**Figure 4.6-31**
**Geologic Hazards - Scripps Ranch Cluster Area**





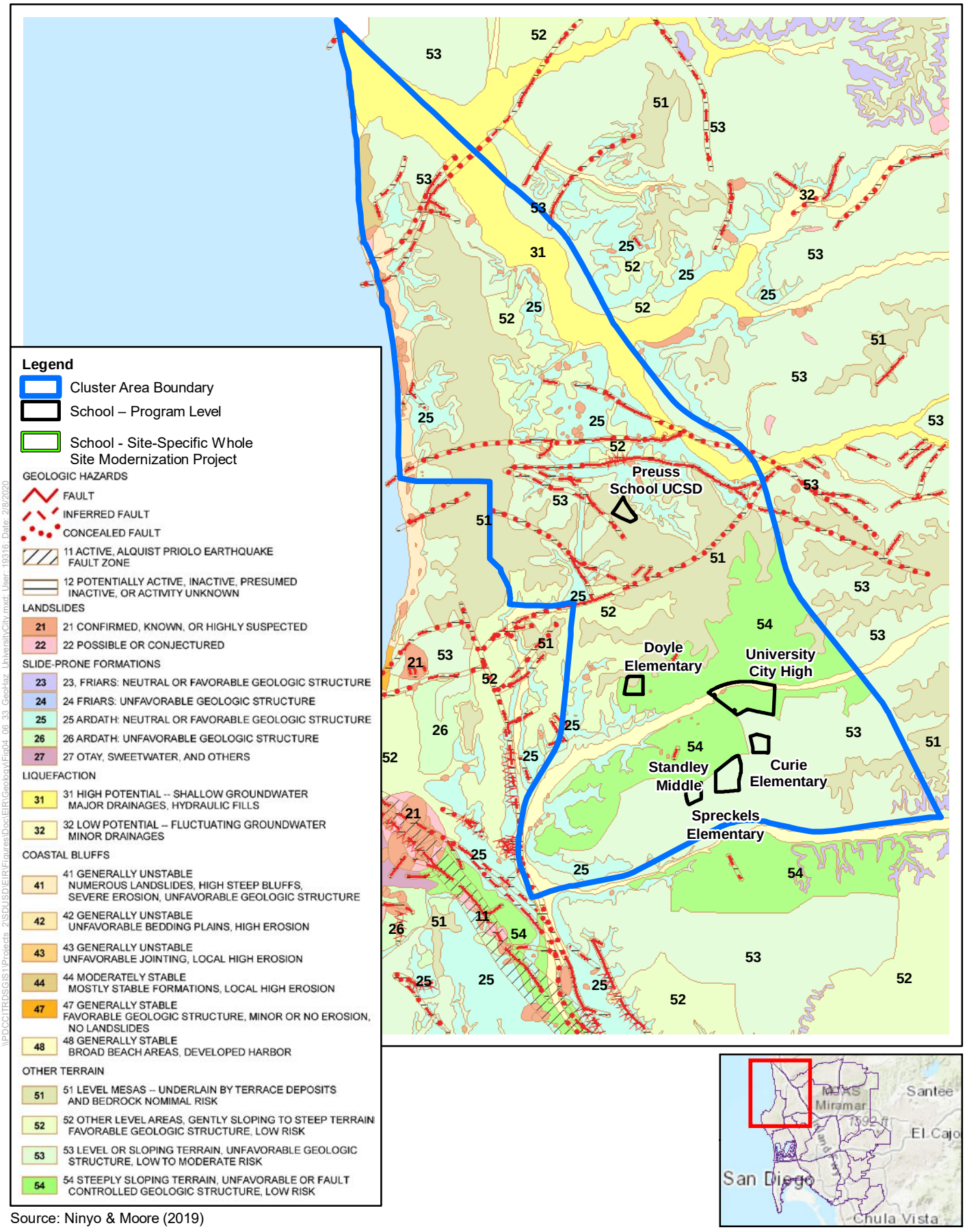


Source: Ninyo & Moore (2019)

0 0.5 1 Miles

N

**Figure 4.6-32**
**Geologic Hazards - Serra Cluster Area**




Source: Ninyo & Moore (2019)

**Figure 4.6-33**
**Geologic Hazards - University City Cluster Area**

**Table 4.6-2. Geologic Hazard Identification for District Clusters**

| Geologic Hazard | Geologic Hazard ID[1] | Clairemont | Crawford | Henry | Hoover | Kearny | La Jolla | Lincoln | Madison | Mira Mesa | Mission Bay | Morse | Point Loma | San Diego | Scripps Ranch | Serra | University City |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Fault Zones: Active, Alquist-Priolo Fault Zone | 11 | X | | | | | X | | | | X | | X | X | | | |
| Fault Zones: Potentially active, inactive, presumed inactive, or activity unknown | 12 | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X |
| Fault Zones: Downtown special fault zone | 13 | | | | | | | | | | | | | X | | | |
| Landslides: Confirmed, known, or highly suspected | 21 | X | | X | | | X | | X | X | | | X | | X | X | X |
| Landslides: Possible or conjectured | 22 | X | | X | | | X | | | X | | X | | | X | X | X |
| Slide-Prone Formations: Friars Formation, neutral or favorable geologic structure | 23 | X | | X | | X | | | X | X | | | | | | X | |

| Geologic Hazard | Geologic Hazard ID[1] | Clairemont | Crawford | Henry | Hoover | Kearny | La Jolla | Lincoln | Madison | Mira Mesa | Mission Bay | Morse | Point Loma | San Diego | Scripps Ranch | Serra | University City |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Slide-Prone Formations: Friars Formation, unfavorable geologic structure | 24 | X | | X | | X | | | | X | | | | | X | X | |
| Slide-Prone Formations: Ardath Shale, neutral or favorable geologic structure | 25 | X | | | | | X | | X | X | X | | | | | | X |
| Slide-Prone Formations: Ardath Shale, unfavorable geologic structure | 26 | X | | | | | X | | | X | | | | | | | X |
| Slide-Prone Formations: Otay, Sweetwater, and others, unfavorable geologic structure | 27 | | | | | | X | X | | | | X | | | | X | |
| Liquefaction: High potential, shallow groundwater, major drainages, hydraulic fills | 31 | X | | X | X | X | | X | | X | X | | X | X | | X | X |
| Liquefaction: Low potential, fluctuating groundwater, minor drainages | 32 | X | X | X | X | X | X | X | X | X | X | | X | X | X | X | X |
| Coastal Bluffs: Generally unstable, numerous landslides, high steep bluffs, severe erosion, unfavorable geologic structure | 41 | | | | | | X | | | | | | X | | | | X |

| Geologic Hazard | Geologic Hazard ID[1] | Clairemont | Crawford | Henry | Hoover | Kearny | La Jolla | Lincoln | Madison | Mira Mesa | Mission Bay | Morse | Point Loma | San Diego | Scripps Ranch | Serra | University City |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Coastal Bluffs: Generally unstable, unfavorable bedding planes, high erosion | 42 | | | | | | | | | | | | | | | | X |
| Coastal Bluffs: Generally unstable, unfavorable jointing, local high erosion | 43 | | | | | | X | | | | | | X | | | | |
| Coastal Bluffs: Moderately stable, mostly stable formations, local high erosion | 44 | | | | | | X | | | | | | X | | | | X |
| Coastal Bluffs: Moderately stable, some minor landslides, minor erosion | 45 | | | | | | | | | | | | X | | | | |
| Coastal Bluffs: Moderately stable, some unfavorable geologic structure, minor or no erosion | 46 | | | | | | | | | | | | X | | | | |
| Coastal Bluffs: Generally stable, favorable geologic structure, minor or no erosion, no landslides | 47 | | | | | | X | | | | X | | | | | | |
| Coastal Bluffs: Generally stable, broad beach areas, developed harbor | 48 | | | | | | X | | | | X | | X | | | | X |

| Geologic Hazard | Geologic Hazard ID[1] | Clairemont | Crawford | Henry | Hoover | Kearny | La Jolla | Lincoln | Madison | Mira Mesa | Mission Bay | Morse | Point Loma | San Diego | Scripps Ranch | Serra | University City |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Other Terrain: Level mesas underlain by terrace deposits and bedrock, nominal risk | 51 | X | | | | X | X | | X | X | | | X | X | X | X | X |
| Other Terrain: Other level areas, gently sloping to steep terrain, favorable geologic structure, low risk | 52 | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X |
| Other Terrain: Level or sloping terrain, unfavorable geologic structure, low to moderate risk | 53 | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X |
| Other Terrain: Steeply sloping terrain, unfavorable or fault-controlled geologic structure, low risk | 54 | X | | | | | X | | X | | X | | | | | | X |

Source: City of San Diego *Seismic Safety Study, Geologic Hazards and Faults*, 2008.

[1] Hazard identification numbers per the *Safety Study, Geologic Hazards and Faults* (City 2008), as shown in Figures 4.6-18 through 4.6-33.

**Table 4.6-3. Other Geologic Hazards**

| Geologic Hazard/Feature | Clairemont | Crawford | Henry | Hoover | Kearny | La Jolla | Lincoln | Madison | Mira Mesa | Mission Bay | Morse | Point Loma | San Diego | Scripps Ranch | Serra | University City |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Mapped Landslides[1] | X | | X | | X | X | | | X | X | X | X | X | X | X | X |
| Landslide Susceptibility[1] | X | | X | | X | X | X | | X | X | X | X | | X | X | X |
| Erosion Potential – Low[2] | | | X | | X | X | | X | X | | | X | | X | X | X |
| Erosion Potential – Moderate[2] | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X |
| Erosion Potential – High[2] | X | X | X | X | X | X | X | X | X | X | X | | X | X | X | X |

Sources: (1) Tan 1995, (2) USDA 2019.

# 4.6.3 Applicable Laws and Regulations

## 4.6.3.1 Federal

No regulations would be applicable.

## 4.6.3.2 State

### State Earthquake Protection Law (Riley Act 1933)

Shortly after the 1933 Earthquake in Long Beach, California, the state enacted the Riley Act, requiring all cities and counties to establish departments to regulate building construction. The Riley Act requires that agencies should have building departments with: (1) appropriately licensed professionals to review and approve construction plans and issue permits; (2) qualified inspectors to ensure compliance and quality during construction; (3) authority to stop improper construction and require that buildings be designed and constructed according to legally defined minimum standards; (4) penalties in law for failure to comply with codes; (5) comprehensive training and continuing education programs; (6) organized post-disaster safety assessment programs; and (7) adequate funding from fees for building permits or other sources to ensure that sufficient staff and resources will be available to effectively regulate construction. A 1941 amendment required the issuance of building permits for all development.

### Field Act

The Field Act of 1933 transferred the regulation of public school design and construction from local governments to the state's Division of Architecture. The Field Act banned the construction of unreinforced masonry buildings, and required that earthquake forces be taken into account in structural design (specifically, a new requirement for a base shear calculation, and that school buildings must be able to withstand lateral forces equal to at least 3% of the building's total mass). The Field Act requires the Department of General Services under the police power of the state to supervise the design and construction of any school building or the reconstruction or alteration of or addition to any school building, if not exempted, to ensure that plans and specifications comply with adopted rules and regulations and building standards published in regulations, and to ensure that the work of construction is performed in accordance with the approved plans and specifications for the protection of life and property.

### Unreinforced Masonry Law

The Unreinforced Masonry Law was enacted in 1986 and required local governments in Seismic Zone 4 to:

- Create an inventory of unreinforced masonry buildings in their jurisdictions;
- Establish an earthquake loss reduction program for these buildings; and
- Report all information about these efforts to the Seismic Safety Commission. (8875 Government Code).

## Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act, passed in 1990, addresses earthquake hazards from non-surface fault rupture, including hazards related to liquefaction and seismically induced landslides. The purpose of the Seismic Hazards Mapping Act, which went into effect in 1991, is to identify and map seismic hazard zones. Such mapping helps cities and counties when preparing the safety elements of their general plans and encourages land use management policies and regulations that reduce seismic hazards. The Seismic Hazards Mapping Act has resulted in the publication of maps that delineate Liquefaction Zones and Earthquake-Induced Landslide Zones of Required Investigation.

## Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting on structures meant for human occupancy. The act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to prepare maps of these zones. The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Local agencies must regulate most development projects within the zones. The primary purpose of the Alquist-Priolo Act is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. Unlike damage from ground shaking, which can occur at great distances from the fault, impacts from fault rupture are limited to the immediate area of the fault zone where the fault breaks along the surface, generally within 50 feet. Accordingly, if an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet).

## California Building Code

The CBC consists of 11 parts that contain administrative regulations of the California Building Standards Commission and regulations of all state agencies that implement or enforce building standards. Local agencies must ensure that development in their jurisdictions comply with guidelines contained in the CBC. Cities and counties can, however, adopt building standards beyond those provided in the CBC.

Geologic resources and geotechnical hazards are governed primarily by local jurisdictions. Most local jurisdictions rely on the CBC for a basis of seismic design. All local jurisdictions must comply with regulations of the Alquist-Priolo Act and Earthquake Fault Zone requirements of the State of California Department of Conservation.

## Division of the State Architect

The Division of the State Architect (DSA) (part of the California Department of General Services) provides design and construction oversight for K–12 schools, community colleges, and various other state-owned and state-leased facilities to ensure that they comply with all structural, accessibility, and fire and life safety codes (California Department of Education 2019). The DSA also develops accessibility, structural safety, and historical building codes and standards utilized in various public and private buildings throughout the state of California. The DSA is responsible for administering certification programs for project inspectors, materials testing laboratories, and certified access specialists.

The authority of the DSA is identified in the Government Code, Education Code, and other applicable laws and standards such as the Health and Safety Code (Sections 16000-16023 and 18950-18961) and Regulations, Title 24, Parts 1-12. The jurisdiction of the DSA includes K–12 public schools and community colleges, State essential services buildings, and other State-funded construction, as described below.

The Field Act establishes stringent structural safety standards for public schools to withstand earthquakes and other hazards, not only to protect students and staff, but also because schools may serve as emergency shelters for their communities in the event of a disaster. Since the Field Act was enacted in 1933, the DSA's review and approval have ensured that there has never been a major structural failure at a public California K–12 school or community college.

Essential services buildings provide services to the public after a major disaster. As such, they must have a high level of structural integrity. The DSA is charged with enforcement of the Essential Services Building Seismic Safety Act and reviews and approves plans for these state-owned and state-leased facilities.

The DSA reviews construction plan compliance with accessibility requirements for all State-funded facilities in California, such as California courts, University of California, California State University, and State-owned buildings.

Additionally, the DSA has responsibility for enforcement in two separate areas of State law, access compliance and general CBC enforcement (Division of the State Architect 2019).

1. **Access Compliance:** The DSA has jurisdiction over access compliance requirements for all buildings in California (including schools) that are publicly-funded in whole or in part by the use of State funds per Government Code Section 4450 through 4461. Plan review of access compliance related features only, is performed for the following entities when public funds are used in construction:
    - Public elementary and secondary Schools (grades K–12)
    - Community colleges
    - All state-owned or state-leased essential services buildings
    - University of California
    - California State University
    - All state-owned State of California property
    - All state-leased State of California property (enforced by DGS/Real Estate Services Division)
    - Certain Charter schools PL 17-01: Charter Schools Enforcement Jurisdiction
2. **General California Building Code Enforcement (For Public Schools and Essential Services Buildings Only):** For public schools and State Essential Services Buildings, the DSA has jurisdiction over all aspects of construction (including access compliance), to ensure that plans, specifications, and construction comply with the building code (Title 24 of the California Code of Regulations). Plan review and construction oversight is provided for all construction (except as noted below) on the following facilities:

- Public elementary and secondary schools (grades K–12) – see Education Code, Sections 17280-17317 and 17365-17374
- Public Community colleges – see Education Code, Sections 81130-81149
- All state-owned or state-leased essential services buildings – see Health and Safety Code, Sections 16000-16023.

## DSA Jurisdiction - Building/Construction Type

All construction must be reviewed and approved by the DSA, except as noted below, before a contract for construction can be awarded. Title 24, Part 1 defines several exceptions (not including access compliance) to DSA jurisdiction for Building Code enforcement for various types of construction as described below.

1. **New Construction**: Per Title 24, Part 1, Section 4-314 – Definitions, the following structures are classified as "school buildings" and are therefore subject to complete review and approval by the DSA:
   - Facilities or structures used for instructional purposes or intended to be entered by pupils or teachers for school purposes.
   - Dwellings for pupils or teachers on the school site.
   - Any structure, utility system or facility necessary to the complete functioning of the school.
   - Any structure on school grounds that could endanger pupils or teachers if it were to collapse.
2. **Additions**: All additions are subject to DSA review and approval regardless of size or cost. Note that additions may only be made to DSA-compliant structures unless alterations to bring the existing structure into compliance are also included in the scope of the project.
3. **Alterations**: Alteration projects require DSA review and approval except for low cost projects. Projects cannot be subdivided for the purpose of evading review requirements.

Note that construction must still conform to all building code requirements and that the school board is still responsible for hiring a licensed architect or engineer to prepare plans and specifications for the construction, and must also provide for adequate inspection of the construction even when plan review by the DSA is not required.

## Excluded Structures and Other Exceptions

Title 24, Part 1, Section 4-314 also defines certain types of structures that are not considered to be "school buildings." When the entire scope of a construction project includes only these structures they may be constructed without first obtaining structural or fire/life safety approval from the DSA. These structures may be submitted to the DSA for full review at the option of the school district. Note that these structures must still be designed, constructed and inspected per code requirements even if they are not submitted to the DSA for structural or fire and life safety review.

Structures that are not considered to be regulated by the DSA as "school buildings," when they constitute the entire scope of construction, include:

- One-story buildings not over 250 square feet in floor area when used exclusively as accessory facilities to athletic fields (equipment storage, toilets, snack bars, ticket booths, etc.).
- Greenhouses, barns and storage sheds used exclusively for plants or animals and not used for classroom instruction (small groups of pupils or teachers may enter these structures for short periods of time).
- Light poles or flagpoles less than 35 feet tall.
- Antenna towers less than 35 feet tall.
- Retaining walls less than 4 feet above the top of foundations and not supporting a surcharge.
- Concrete or masonry fences less than 6 feet above adjacent grade.
- Ball walls or yard walls less than 6 feet above adjacent grade.
- Signs, scoreboards, or solid-clad fences less than 8 feet above adjacent grade.
- Bleachers and grandstands with five rows of seats or less.
- Playground equipment, open-mesh fences, and baseball backstops.
- "Temporary-use" buildings on community college sites used for less than 3 years.
- "Trailer Coaches" that conform to the requirements of the Health and Safety Code, Division 13, Part 2, commencing with Section 18000, that are not greater than 16 feet in width and used for special education purposes for no more than 12 pupils at a time (or 20 pupils for driver training purposes).

Section 4-310 of Title 24, Part 1 states that the following types of buildings are not subject to the Field Act requirements and therefore need not be submitted to the DSA for structural or fire/life safety review; however, these structures must still be designed, constructed, and inspected per code requirements even if they are not submitted to the DSA. These types of buildings must also be reviewed and approved by the DSA for access compliance requirements (see above):

- Bus garage, warehouse, storage and similar buildings.
- Dwellings for non-teacher, non-pupil employees.
- Other "non-school use" buildings or structures.
- District-wide administration buildings that are not on a school site that are not entered by pupils or teachers for school purposes.

The school board must take all necessary precautions to prevent injuries to pupils or teachers on school grounds as a result of collapse of "non-school" buildings on a school site. Such precautions may include fencing-off the non-school buildings from the rest of the school site. Also, a sign stating that: "This building does not meet the earthquake safety requirements of the California State building code and shall not be entered by pupils or teachers" must be posted on all non-school buildings on school sites. Finally, the school board must pass a resolution stating that the structure cannot be used for school purposes and that no pupils or teachers, as such, will be permitted to use or enter said building for said purposes or be subjected to a hazard resulting from its collapse. A copy of the resolution must be submitted to the DSA.

## Education Code Section 17251/California Code of Regulations, Title 5

Education Code Section 17251 and the California Code of Regulations (CCR), Title 5, Sections 14001 through 14012, outline the powers and duties of the California Department of Education (CDE) regarding school sites and the construction of school buildings. Districts seeking state funding must comply with the Education Code and Title 5. Site approval from the Department must be granted before the State Allocation Board will apportion funds. Districts using local funds are encouraged to seek the Department's approval for the benefits that such outside, objective reviews provide to the school district and the community. The California Department of Education issues and maintains a *School Site Selection and Approval Guide* to assist school districts in selecting sites that provide a safe and supportive environment for the instructional program and the learning process. It outlines the selection criteria for gaining California Department of Education approval, a condition for receiving state funds.

The California Education Code provides provisions specific to geologic hazards:

> 17212: The governing board of a school district, prior to acquiring any site on which it proposes to construct any school building as defined in Section 17283 shall have the site, or sites, under consideration investigated by competent personnel to ensure that the final site selection is determined by an evaluation of all factors affecting the public interest and is not limited to selection on the basis of raw land cost only. If the prospective school site is located within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan as provided in subdivision (g) of Section 65302 of the Government Code, the investigation shall include any geological and soil engineering studies by competent personnel needed to provide an assessment of the nature of the site and potential for earthquake or other geologic hazard damage.
>
> The geological and soil engineering studies of the site shall be of such a nature as will preclude siting of a school in any location where the geological and site characteristics are such that the construction effort required to make the school building safe for occupancy is economically unfeasible. No studies are required to be made if the site or sites under consideration have been the subject of adequate prior studies. The evaluation shall also include location of the site with respect to population, transportation, water supply, waste disposal facilities, utilities, traffic hazards, surface drainage conditions, and other factors affecting the operating costs, as well as the initial costs, of the total project.
>
> For the purposes of this article, a special studies zone is an area which is identified as a special studies zone on any map, or maps, compiled by the State Geologist pursuant to Chapter 7.5 (commencing with Section 2621) of Division 2 of the Public Resources Code.
>
> 17212.5: Geological and soil engineering studies as described in Section 17212 shall be made, within the boundaries of any special studies zone, for the construction of any school building as defined in Section 17283, or if the estimated cost exceeds twenty-five thousand dollars ($25,000), for the reconstruction or alteration of or addition to any school building for work which alters structural elements. The Department of General Services may require similar geological and soil engineering studies for the construction or alteration of any school building on a site located outside of the boundaries of any special studies zone. No studies need be made if the site under consideration has been the subject of adequate prior studies.
>
> No school building shall be constructed, reconstructed, or relocated on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building.
>
> A copy of the report of each investigation conducted pursuant to this section shall be submitted to the Department of General Services pursuant to Article 3 (commencing with Section 17280) of this

chapter and to the State Department of Education. The cost of geological and soil engineering studies and investigations conducted pursuant to this section may be treated as a capital expenditure. The dollar amount set forth in this section shall be increased on an annual basis, according to a construction costs inflation index recognized and selected by the department.

# 4.6.3.3 Local

California Government Code Section 53094 includes provisions for school districts to exempt specific school facilities from local zoning regulations. However, the following City plans and policies are relevant to the Proposed Program for project categories such as joint-use or other administrative (non-educational) projects.

## City of San Diego General Plan

The Public Facilities, Services, and Safety Element of the City of San Diego General Plan includes goals and policies to reduce the risk of hazard resulting from future seismic and related events. The seriousness of seismic risk to public safety is a function not only of local seismic conditions, but also of the degree of public awareness of the seismic hazards present, and the effectiveness of mitigation policies and practices utilized to reduce the risk resulting from the hazards. This section identifies existing and potential land use planning efforts that are instrumental in planning for seismic safety. The following goals and policies are relevant to the Proposed Program:

**PF-Q.1**. Protect public health and safety through the application of effective seismic, geologic and structural considerations.

a. Ensure that current and future community planning and other specific land use planning studies continue to include consideration of seismic and other geologic hazards. This information should be disclosed, when applicable, in the California Environmental Quality Act (CEQA) document accompanying a discretionary action.

b. Maintain updated citywide maps showing faults, geologic hazards, and land use capabilities, and related studies used to determine suitable land uses.

c. Require the submission of geologic and seismic reports, as well as soils engineering reports, in relation to applications for land development permits whenever seismic or geologic problems are suspected.

d. Utilize the findings of a beach and bluff erosion survey to determine the appropriate rate and amount of coastline modification permissible in the City.

e. Coordinate with other jurisdictions to establish and maintain a geologic “data bank” for the San Diego area.

f. Regularly review local lifeline utility systems to ascertain their vulnerability to disruption caused by seismic or geologic hazards and implement measures to reduce any vulnerability.

g. Adhere to state laws pertaining to seismic and geologic hazards.

**PF-Q.2**. Maintain or improve integrity of structures to protect residents and preserve communities.

a. Abate structures that present seismic or structural hazards with consideration of the desirability of preserving historical and unique structures and their architectural

appendages, special geologic and soils hazards, and the socio-economic consequences of the attendant relocation and housing programs.

b. Continue to consult with qualified geologists and seismologists to review geologic and seismic studies submitted to the City as project requirements.

c. Support legislation that would empower local governing bodies to require structural inspections for all existing pre-Riley Act (1933) buildings, and any necessary remedial work to be completed within a reasonable time.

## San Diego Unified School District *Architect's Professional Services Manual*

The District's *Architects Professional Services Manual* has been prepared to establish and sustain consistent representation of requirements and standards that must be adhered to by the entire Design Team. It represents the criteria and standards that are expected by the District for the deliverance of professional services by members of the Design Team and includes by reference the District Design Guidelines, District Educational Specifications, District Guide Specifications, District CAD and BIM Standards and any and all applicable laws and requirements. Specifically, as shown in the table below, *Part D – Geotechnical/Geohazards Investigation Requirements* dictates the requirements for the geological investigation/reconnaissance and preliminary soils investigation of sites, including new school sites and improvements to existing school sites, to provide a basis for conclusions and recommendations to the District, the Project Architect, and the respective design disciplines.

| **Article** | **Civil/Site Survey Standards** |
|---|---|
| D.1 | The geohazard portion of the report shall include the following statement in accordance with Education Code section 17213:<br><br>We have reviewed available geologic date, i.e. fault maps California Department of Mines and Geology, United States Geological Survey for the general site area. This site is not within a State of California Alquist-Priolo Special Studies Zone for earthquake faults. |
| D.2 | Seismic classifications shall be completed in accordance with applicable sections of Title 2A, including preparation of student risk analysis, discussion of fault classifications and recurrence intervals (actual and potential) in accordance with Title 5, section 14010 California Code of Regulations (CCR) and the Uniform Building Code Section IV. |
| D.3 | Geotechnical report evaluations must be performed in accordance with Current California Code of Regulations, (requirements for geotechnical evaluations of public school sites). Chapter 18A specifies that geotechnical evaluations must include at least one exploratory boring for each 5,000 square feet of new building pad area and at least two exploratory borings per new building pad area. |

| Article | Civil/Site Survey Standards |
|---|---|
| D.4 | Development of a geotechnical investigation shall include, but not be limited to:<br>a) Communication with other design disciplines to determine their respective geotechnical requirements<br>b) Performance of literature searches, site history analyses, etc., related to surface and subsurface conditions<br>c) Formulation or engineering evaluation of field exploration and laboratory testing programs to accomplish the scope of the investigation<br>d) Preparation or engineering evaluation of proposals. |
| D.5 | Development of geotechnical field and laboratory studies shall include, but not be limited to:<br>a) Direction and/or modification of field exploration programs, as required upon evaluation of the conditions encountered<br>b) Classification and evaluation of subsurface conditions<br>c) Routine field and laboratory tests<br>d) Evaluation of in situ density, compressibility, soluble sulfate, pH and resistivity, chloride ion content, compaction, shear strength, pavement support and expansion characteristics of the soil. Prepare a written report presenting the findings and conclusions including grading specifications, liquefaction analysis, foundation design criteria, retaining wall criteria, excavation means and methods, remedial grading measures and geological hazards associated with the proposed project development scope. |
| D.6 | Geotechnical field and laboratory tests shall include but not be limited to:<br>a) Soil strength<br>b) Bearing capacity<br>c) Expansion properties<br>d) Consolidation characteristics<br>e) Soil collapse potential<br>f) Erosion potential<br>g) Compaction characteristics<br>h) Material acceptability for use in fill<br>i) Pavement support qualities<br>j) Freeze-thaw properties<br>k) Grain-size<br>l) Permeability/percolation properties. |

| Article | Civil/Site Survey Standards |
|---|---|
| D.7 | Analysis of geotechnical data and engineering computations shall include, but not be limited to, analysis of field and laboratory test results regarding:<br>a) Soil strength<br>b) Bearing capacity<br>c) Expansion properties<br>d) Consolidation characteristics<br>e) Soil collapse potential<br>f) Erosion potential<br>g) Compaction characteristics<br>h) Material acceptability for use in fill<br>i) Pavement support qualities<br>j) Freeze-thaw properties<br>k) Permeability/percolation properties<br>l) Ground water conditions<br>m) Soil dynamic properties. |
| D.8 | Performance of computations using test results and available data regarding:<br>a) Bearing capacity<br>b) Foundation type, depth, dimensions<br>c) Allowable soil bearing pressures<br>d) Potential settlement<br>e) Slope stability<br>f) Retaining systems<br>g) Soil treatment<br>h) Dewatering/drainage<br>i) Floor support<br>j) Pavement design<br>k) Site preparation<br>l) Fill construction<br>m) Liquefaction potential<br>n) Ground response to seismic forces<br>o) Ground water problems; seepage<br>p) Underpinning |
| D.9 | Performance or engineer evaluation of construction, post construction and site monitoring shall include, but not be limited to:<br>a) Performance or supervision of geotechnical testing and observation of site grading<br>b) Analysis, design and evaluation of instrumentation programs to evaluate or monitor various phenomena in the field, such as settlement, slope creep, pore water pressures and ground water variations<br>c) Geotechnical observation during construction and/or installation, including but not limited to, spread foundations, drilled piers, piles, slurry walls, anchors, bulkhead, shoring, underpinning and subdrains<br>d) Preparation of specifications and guidelines |

| Article | Civil/Site Survey Standards |
|---|---|
| D.10 | Preparation or engineering evaluation of geotechnical reports shall include, but not be limited to:<br>a) Preparation of appropriate plans, logs, test results and other exhibits<br>b) Documentation of testing and observation<br>c) Preparation of written reports which present findings, conclusions and recommendations of the investigation<br>d) Preparation of specifications and guidelines |
| D.11 | Geotechnical investigations shall include the following scope of duties:<br>Soils test borings (any and all borings shall be backfilled on the same day. Unless otherwise specified, two borings shall be provided per building pad (1 per free standing elevator shaft.) Location and number of test borings shall be verified and coordinated with the project structural engineer and District. Schedule and seismic classifications shall be completed in accordance applicable sections of Title 2A.<br>a) The geological setting of the site<br>b) Potential geological hazards, including presence and classification of areas<br>c) Identify general subsurface soils conditions<br>d) Identify general extent of existing fill soils. Identify conditions of areas to receive soils. Present condition and classification of proposed fill material including presence and effect of expansive soils<br>e) Depth to water (if encountered within the depth of the subsurface investigation as prescribed by the evaluation of settlement of existing structures) including perched and ground water zones<br>f) Provide recommendations regarding active lateral earth pressures, allowable passive earth pressures, friction values and allowable soil bearing pressures for foundation design recommendations<br>g) Stability of proposed cut and fill slopes and slope ratio<br>h) Cut/fill slopes shall include lateral/gross stability of slopes including underlying soil properties which may impact stability, shall include shear factors |
| D.12 | Geotechnical investigations continued:<br>i) If contaminated soils or hazardous materials are encountered through the duration of field activities, notify District in writing immediately before proceeding with any further activities<br>j) Identify grading and earth work i.e., cut/fill transitions, native soils<br>k) Identify types and depths of foundations in design. Allowable soil bearing pressures<br>l) Differential settlements of hard surface improvements or landscaped areas should be identified<br>m) Identify settlements of existing structures<br>n) Design pressures for retaining walls and restrained walls including surcharge<br>o) Corrosivity and sulfate content of soils samples<br>p) New flexible pavement design, provide testing and recommendation of new paving section (asphalt or concrete) as required by design engineer. Verify location and limits of proposed paving areas with project architect of as approved by District<br>q) Design recommendation for slab-on-grade thickness, reinforcing schedule and base material/gradation and compaction. |

| Article | Civil/Site Survey Standards |
|---|---|
| D.13 | All work performed in this section shall be completed in accordance with the following professional standards:<br>a) Geologist and Geophysicist Act<br>b) Professional Engineers Act<br>c) California Mines and Geology Note 41 – "General Guidelines for Reviewing Geologic Reports"<br>d) California Mines and Geology Note 42 – "Guidelines for Preparing Engineering Geologic Reports"<br>e) California Mines and Geology Note 44 – "Recommended Guidelines for Preparing Engineering Geologic Reports"<br>f) California Mines and Geology Note 48 – "Checklists for the Review of Geologic/Seismic Reports for California Public Schools, Hospitals, and Essential Services Buildings"<br>g) California Mines and Geology Note 49 – "Guidelines for Evaluating the Hazard of Surface Fault Rupture"<br>h) California Department of Mines and Geology Special Publication 117 "Guidelines for Evaluating and Mitigating Seismic Hazards in California"<br>i) California Board of Registration for Geologists and Geophysics - "Guidelines for Engineering Geologic Reports"<br>j) California Education Code; - Section 17212 et seq.<br>k) California Government Code; - Section 65302<br>l) City of San Diego Technical Guidelines for Geotechnical Reports<br>m) American Society of Testing and Materials Guidelines – "Soil and Rock", Volume 04.08 and 04.09. |

# 4.6.4 Impact Analysis

## 4.6.4.1 Methodology

The methodology governing this PEIR's analysis of potential impacts related to geology and soils was based on the existing geologic and soil conditions established in Section 4.6.2, *Existing Conditions*, and the applicable laws and regulations pertaining to geologic hazards and soils described in Section 4.6.3, *Applicable Laws and Regulations*. Construction and operation activities at existing or potential future school sites or administrative facilities located within areas of geologic hazards would have the potential to result in impacts associated with geology and soils.

The analysis considers impacts associated with construction and operation of the Proposed Program. Mitigation measures are provided, where applicable. The Proposed Program consists of improvements identified in four project categories that represent typical capital improvement projects that could be implemented at any of the District's schools and administrative sites, or future sites. Implementation of these project types could result in impacts related to geology and soils.

## 4.6.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining significance of impacts associated with geology and soils resulting from the

implementation of the Proposed Program. The determination of whether a geology and soils impact would be significant is based on the thresholds described below and the professional judgment of the District as Lead Agency the recommendations of qualified personnel at ICF and Ninyo & Moore, all of which is based on the evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following.

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    a. 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.
    b. Strong seismic ground shaking.
    c. Seismic-related ground failure, including liquefaction.
    d. Landslides.
2. Result in substantial soil erosion or the loss of topsoil.
3. 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.
4. 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.
5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater.
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

As discussed in the Initial Study/Environmental Checklist Section VII, *Geology and Soils* (Appendix B), Threshold 5 is not included in the analysis below, as it was determined that the Proposed Program would not result in significant impacts related to alternative wastewater disposal systems. Those conclusions and the rationale that supports them are summarized in Chapter 6, *Additional Consequences of Project Implementation*. In addition, Threshold 6 is addressed in Section 4.4, *Paleontological Resources*. Therefore, only Thresholds 1, 2, 3, and 4 are discussed in the impact analysis that follows.

# 4.6.4.3 Impacts and Mitigation Measures

***Threshold 1: Would the Proposed Program directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

***a. 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?***

***b. Strong seismic ground shaking?***

***c. Seismic-related ground failure, including liquefaction?***

***d. Landslides?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

***Construction***

New acquisition would be an administrative procedure and would not directly result in any physical changes on the environment. However, once the site has been acquired, the planning and construction of a new school, charter school, or administrative facilities would introduce new structures to a seismically active area and involve deep excavation and other ground-disturbing activities.

*Rupture of a Known Earthquake Fault and Strong Seismic Shaking*

As southern California is seismically very active, construction activities related to this project category could occur on or near an earthquake fault or experience seismic shaking. Construction activities associated with new school or administrative facilities would not cause or exacerbate the rupture of a fault or seismic shaking that would result in substantial damage to structures or infrastructure, because fracking and other similarly disruptive activities would not be required. However, because the new school or administrative facility would be located in a seismically active area, the construction equipment and new structures would be at risk for loss, damage, or destruction if a seismic activity were to occur. A fault rupture or strong seismic shaking could cause cracks in foundations, or other damage to or collapse of structures and equipment if not properly constructed to withstand such a seismic event. As described above, and consistent with the District's *Architect's Professional Services Manual*, during the planning, construction, and modernization of any District facility, the District conducts a review of seismic hazards in accordance with Education Code Section 17213; receives relevant DSA design approval of all project plans; submits to DSA oversight and inspections, as required, during construction; and obtains DSA certification that each new school building meets State statutory safety requirements related to seismic safety. Furthermore, all

seismic classifications are completed in accordance with applicable sections of Title 2A, including preparation of student risk analysis, discussion of fault classifications and recurrence intervals (actual and potential) in accordance with CCR Title 5, Section 14010 and the Uniform Building Code Section IV. Geotechnical report evaluations are performed in accordance with the current California Code of Regulations requirements for geotechnical evaluations of public school sites. Chapter 18A specifies that geotechnical evaluations must include at least one exploratory boring for each 5,000 square feet of new building pad area and at least two exploratory borings per new building pad area.

All District geotechnical field tests, laboratory tests, engineering computations, and performance computations examine, at minimum, the following characteristics:

a) Soil strength
b) Bearing capacity
c) Expansion properties
d) Consolidation characteristics
e) Soil collapse potential
f) Erosion potential
g) Compaction characteristics
h) Material acceptability for use in fill
i) Pavement support qualities
j) Freeze-thaw properties
k) Grain-size
l) Permeability/percolation properties
m) Ground water conditions
n) Soil dynamic properties
o) Foundation type, depth, dimensions
p) Allowable soil bearing pressures
q) Potential settlement
r) Slope stability
s) Retaining systems
t) Soil treatment
u) Dewatering/drainage
v) Floor support
w) Pavement design
x) Site preparation
y) Fill construction
z) Liquefaction potential
aa) Ground response to seismic forces
bb) Ground water problems; seepage
cc) Underpinning.

District projects would comply with the *Architect's Professional Services Manual*, the CBC, DSA requirements, and CDE standards, which, in combination would ensure that any geological hazards are remedied before any project construction can begin. Therefore, surface rupture hazards from a known active fault associated with new school or administrative facilities would be less than significant.

*Seismic-related Ground Failure, Including Liquefaction*

The Clairemont, Henry, Hoover, Kearny, Lincoln, Mira Mesa, Mission Bay, Point Loma, San Diego, Serra, and University City clusters are located within areas mapped with a high potential for liquefaction. If a seismic event were to occur and trigger liquefaction, structures or construction equipment located on the saturated soils could partially sink, lean, or collapse, which could cause damage to the equipment and structures. As described above, the District would be required to comply with their *Architect's Professional Services Manual,* which requires the preparation of geotechnical evaluations; the CBC; DSA requirements; and CDE standards. In combination, these requirements would ensure that any geologic hazards are identified and remedied before project construction can begin. Therefore, construction activities associated with new school or administrative facilities in these clusters would not have the potential to indirectly cause potential substantial adverse effects, including loss involving liquefaction if a seismic activity were to occur. Impacts would be less than significant.

*Landslides*

The Clairemont, Henry, Kearny, La Jolla, Lincoln, Madison, Mira Mesa, Mission Bay, Morse, Point Loma, San Diego, Scripps Ranch, Serra, and University City clusters are located within areas containing mapped landslides or susceptible to landslides. If a landslide were to occur during construction, construction equipment and new structures could be damaged or destroyed by the landslide material. However, the District would be required to comply with their *Architect's Professional Services Manual*, the CBC, DSA requirements, and CDE standards, which would ensure that any geologic hazards are identified and remedied before project construction can begin. Therefore, construction activities associated with new school or administrative facilities in these clusters would not have the potential to indirectly cause substantial adverse effects, including risk of loss if a landslide were to occur. Impacts would be less than significant.

***Operation***

Operational activities at new school, including charter school, and administrative facilities would not involve additional ground disturbance or other activities that could result in impacts related to geology and soils. Operation of new schools or administrative facilities would bring new students and staff to the sites. If a seismic event, liquefaction, or landslide were to occur, buildings that are occupied by students and staff would be at risk for damage or collapse, which could expose people to increased risk of injury or death. However, the District would be required to comply with their *Architect's Professional Services Manual*, the CBC, DSA requirements, and CDE standards, which require that any new construction or renovation implement building features that are earthquake resistant. As such, surface rupture hazards from a known active fault associated with new school or administrative facilities would be less than significant.

### Level of Significance Prior to Mitigation

***Construction***

Construction activities associated with new school or administrative facilities would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

***Operation***

Operation of new school or administrative facilities would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

***Construction***

Construction activities associated with new school or administrative facilities would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

#### *Operation*

Operation of new school or administrative facilities would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

The Whole Site Modernization project category could include the construction of new structures, as well as the demolition and replacement of existing structures, at schools, including charter schools, and administrative facilities. Construction activities associated with this project category would have similar results to those explained above under new acquisition and new school or administrative facilities construction. If fault rupture, seismic shaking, liquefaction, or landslides were to occur during construction, the equipment and structures would be at risk for damage or collapse. However, the District would be required to comply with their *Architect's Professional Services Manual*, the CBC, DSA requirements, and CDE standards, which would ensure that any geologic hazards are identified and remedied before project construction can begin. Therefore, whole site modernization projects would not have the potential to indirectly cause substantial adverse effects, including risk of loss as result of fault rupture or seismic shaking, liquefaction, or landslide. Impacts would be less than significant.

#### *Operation*

The Whole Site Modernization project category does not include a change in current operations at existing school sites. Therefore, no new students or staff would be introduced to the area or be exposed to risk from seismic events, and there would be no change in the existing condition as a result of operation of a whole site modernization project. Furthermore, the District would be required to comply with their *Architect's Professional Services Manual,* the CBC, DSA requirements, and CDE standards, which would ensure the safety of occupants during operation. Therefore, whole site modernization projects would not cause increased risk of loss, injury, or death as result of fault rupture or seismic shaking if a seismic activity were to occur and cause liquefaction, or if a landslide were to occur, and impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with whole site modernization projects would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

#### *Operation*

Operation of whole site modernization projects would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with whole site modernization projects would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

#### *Operation*

Operation of whole site modernization projects would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

Construction of pools associated with the Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project category would require deep excavation and other ground disturbance for associated facilities. Construction activities associated with these project categories would have similar results to those explained above under *New Acquisition and New School or Administrative Facilities,* and *Whole Site Modernizations*. If fault rupture, seismic shaking, liquefaction, or landslides were to occur during construction, the equipment and structures would be at risk for damage or collapse. However, the District would be required to comply with their *Architect's Professional Services Manual*, the CBC, DSA requirements, and CDE standards, which would ensure that any geologic hazards are identified and remedied before project construction can begin. Therefore, the construction of joint-use facilities would not have the potential to indirectly cause substantial adverse effects, including risk of loss as result of fault rupture or seismic shaking, liquefaction, or landslide. Impacts would be less than significant.

#### *Operation*

The Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project category does not include a change in current operations at existing school sites. Therefore, no new students or staff would be introduced to the area or be exposed to risk from seismic events, and there would be no change in the existing condition as a result of operation of a joint-use facility. Furthermore, the District would be required to comply with their *Architect's Professional Services Manual,* the CBC, DSA requirements, and CDE standards, which would require identification and remediation of any geologic hazards prior to construction and would ensure the safety of occupants during operation. Therefore, joint-use facilities would not cause increased risk of loss, injury, or death as result of fault rupture or seismic shaking if a seismic activity were to occur and cause liquefaction, or if a landslide were to occur, and impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with joint-use facilities would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

#### *Operation*

Operation of joint-use facilities would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with joint-use facilities would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

#### *Operation*

Operation of joint-use facilities would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

The Upgrades of Existing School and Administrative Sites project category could include minor ground disturbance activities for utilities trenching, fencing, or paving. In addition, HVAC installation would include the addition of new structures to the roof, windows, or ground. Minimal to no ground-disturbing activities would occur. Therefore, this category would not result in increased risk of loss, injury or death as result of fault rupture or seismic shaking, liquefaction, or landslides, and impacts would be less than significant.

#### *Operation*

The Upgrades of Existing School and Administrative Sites project category does not include a change in current operations at existing school sites. Therefore, no new students or staff would be introduced to the area or be exposed to risk from seismic events, and there would be no change in the existing condition as a result of operation of this category. Furthermore, the District would be required to comply with their *Architect's Professional Services Manual,* the CBC, DSA requirements, and CDE standards, which would require identification and remediation of any geologic hazards prior to construction and would ensure the safety of occupants during operation. Therefore, upgrades of existing school and administrative sites would not cause increased risk of loss, injury, or

death as result of fault rupture or seismic shaking if a seismic activity were to occur and cause liquefaction, or if a landslide were to occur, and impacts would be less than significant.

#### Level of Significance Prior to Mitigation

##### *Construction*

Construction associated with the upgrades of existing school and administrative sites would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

##### *Operation*

Operation following upgrades of existing school and administrative sites would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

#### Mitigation Measures

No mitigation is required.

#### Level of Significance After Mitigation

##### *Construction*

Construction associated with the upgrades of existing school and administrative sites would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

##### *Operation*

Operation following upgrades of existing school and administrative sites would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

## Site-Specific Analysis

### Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.6-4. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the whole site modernization project category, as described further in Chapter 3, *Project Description*.

**Table 4.6-4. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019.

### Construction

#### *Rupture of a Known Earthquake Fault and Strong Seismic Shaking*

Construction activities associated with the near-term, site-specific whole site modernization projects could result in activities such as demolition, grading and excavation, and construction of buildings, which would not cause or exacerbate the rupture of a fault or seismic shaking that would result in substantial damage to structures or infrastructure, because fracking and other similarly disruptive activities would not be required. However, because the site-specific projects would be located in a seismically active area, the construction equipment and new structures would be at risk for loss, damage, or destruction if a seismic activity were to occur. A fault rupture or strong seismic shaking could cause cracks in foundations, or other damage to or collapse of structures and equipment if not properly constructed to withstand such a seismic event.

As described under *Program-Level Analysis* above, all site-specific projects would be required to comply with the District's *Architect's Professional Services Manual,* the requirements of which are described in detail above. Compliance with the CBC, DSA, and CDE would further ensure that surface rupture hazards from a known active fault associated with site-specific projects would be less than significant.

***Seismic-related Ground Failure, Including Liquefaction***

Barnard Elementary is located within an area mapped with a high potential for liquefaction. As described under *Program-Level Analysis* above, all site-specific projects would be required to comply with the District's *Architect's Professional Services Manual*, which requires the preparation of geotechnical evaluations, the CBC, DSA requirements, and CDE standards. Therefore, construction activities associated with the site-specific projects located in areas mapped with a high potential for liquefaction would not have the potential to indirectly cause potential substantial adverse effects, including loss involving liquefaction if a seismic activity were to occur. Impacts would be less than significant.

***Landslides***

Site-specific schools located within areas containing mapped landslides or susceptible to landslides include Boone Elementary, Fulton K-8, and Valencia Park Elementary. As discussed under the *Program-Level Analysis*, if a landslide were to occur during construction, construction equipment and new structures could be damaged or destroyed by the landslide material. Also, all site-specific projects would be required to comply with the District's *Architect's Professional Services Manual*, the CBC, DSA requirements, and CDE standards. Therefore, construction activities associated with the site-specific projects located in areas containing mapped landslides or susceptible to landslides would not have the potential to indirectly cause potential substantial adverse effects, including risk of loss if a landslide were to occur. Impacts would be less than significant.

### Operation

The near-term, site-specific whole site modernization projects do not include a change in current operations at existing school sites. Therefore, no new students or staff would be introduced to the area or be exposed to risk from seismic events, and there would be no change in the existing condition as a result of operation of the whole site modernizations for the site-specific projects. Therefore, site-specific schools would not cause increased risk of loss, injury, or death as result of fault rupture or seismic shaking if a seismic activity were to occur and cause liquefaction, or if a landslide were to occur, and impacts would be less than significant.

## Level of Significance Prior to Mitigation

### Construction

Construction of near-term, site-specific whole site modernization projects would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

### Operation

Operation of near-term, site-specific whole site modernization projects would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### Construction

Construction of near-term, site-specific whole site modernization projects would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

#### Operation

Operation of near-term, site-specific whole site modernization projects would not result in increased risk of loss, injury, or death due to geologic hazards. Impacts would be less than significant.

## *Threshold 2: Would the Proposed Program result in substantial soil erosion or the loss of topsoil?*

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

There is a potential that new school sites could be constructed on undeveloped land. Ground-disturbing activities on undeveloped land or extensive grading and excavation would remove topsoil and could result in soil erosion if the soils are prone to erosion. Erosion related to stormwater runoff is discussed in Section 4.9, *Hydrology and Water Quality*.

Each cluster contains soils with some potential for erosion. Therefore, construction activities associated with new school or administrative facilities would potentially result in substantial soil erosion or the loss of topsoil, and impacts would be potentially significant **(Impact-GEO-1)**.

Implementation of **MM-HWQ-1** would be required, which would involve preparation of a Storm Water Pollution Prevention Plan (SWPPP) and ensure implementation of appropriate construction best management practices (BMPs) for erosion control. The SWPPP would identify which construction BMPs would be implemented in order to protect stormwater runoff and would include a monitoring plan for measuring BMP effectiveness. The SWPP would follow guidelines established in the City of San Diego Jurisdictional Runoff Management Plan or equivalent guidelines that could include, but would not be limited to, minimization of the exposure time of disturbed areas through the use of sand bags, gravel, hale bales, etc.; surrounding the site with perimeter controls such as gravel bags; storage of building and construction materials on site; or covering temporary piles of soil/dirt with tarps. Implementation of these, or similar, BMPs would minimize the potential for soil erosion to occur. Therefore, compliance with **MM-HWQ-1** would reduce impacts of a new school or administrative facility related to substantial soil erosion or loss of topsoil during construction activities. With implementation of **MM-HWQ-1**, **Impact-GEO-1** would be reduced to less than significant.

***Operation***

Operation of a new school or administrative facility would not involve ground-disturbing activities. Therefore, topsoil would not be removed during operation, and soils with erosion potential would not be exposed or otherwise disturbed. Furthermore, the District would be required to comply with their *Architect's Professional Services Manual*, which requires geotechnical field and laboratory tests to assess erosion potential. Impacts related to the potential for increased soil erosion due to the addition of impervious surfaces and stormwater runoff are discussed in Section 4.9. Impacts would be less than significant.

**Level of Significance Prior to Mitigation**

***Construction***

**Impact GEO-1: Potential to Result in Substantial Soil Erosion or the Loss of Topsoil During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could expose soils to the elements, which could cause substantial soil erosion or the loss of topsoil.

***Operation***

As discussed above, operational activities associated with new school or administrative facilities would result in less-than-significant impacts related to substantial soil erosion or loss of topsoil.

**Mitigation Measures**

For **Impact-GEO-1:**

> **MM-HWQ-1**: **Implement Construction Best Management Practices.** Prior to the onset of any construction activities affecting over 1 acre of land, the District shall obtain coverage under the National Pollutant Discharge Elimination System Construction General Permit, as issued by the San Diego Regional Water Quality Control Board. The District shall be responsible for ensuring that construction activities comply with the conditions in this permit, including development of a Stormwater Pollution Prevention Plan (SWPPP), implementation of Best Management Practices (BMPs) identified in the SWPPP, and monitoring (as required) to ensure that effects on water quality are minimized. As part of this process, the District shall implement multiple erosion and sediment control BMPs in areas with the potential to drain to surface water. Guidelines established in the City of San Diego Jurisdictional Runoff Management Plan or equivalent guidelines shall be followed in selecting, implementing, and monitoring BMPs for construction activities. The District shall verify that a notice of intent has been submitted to the State Water Resources Control Board and a SWPPP has been completed before allowing construction to begin.
>
> Prior to the onset of any construction activities under 1 acre, the District shall prepare a BMP Plan that identifies implementation of BMPs to ensure that effects on water quality are minimized. As part of this process, the District shall implement multiple erosion and sediment control BMPs in areas with the potential to drain to surface water.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-HWQ-1** would ensure implementation of appropriate construction BMPs for erosion control. In accordance with the City of San Diego Jurisdictional Runoff Management Plan or equivalent guidelines, BMPs could include, but would not be limited to, minimization of the exposure time of disturbed areas through the use of sand bags, gravel, hale bales, etc.; surrounding the site with perimeter controls such as gravel bags; storage of building and construction materials on site; or covering temporary piles of soil/dirt with tarps. Implementation of these, or similar, BMPs would minimize the potential for soil erosion to occur. Compliance with **MM-HWQ-1** would reduce impacts of new school or administrative facilities related to substantial soil erosion or loss of topsoil during construction activities. Therefore, with implementation of **MM-HWQ-1**, **Impact-GEO-1** would be reduced to less than significant.

#### *Operation*

As discussed above, operational activities associated with new school or administrative facilities would result in less-than-significant impacts related to substantial soil erosion or loss of topsoil.

## Whole Site Modernization and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

#### *Construction*

There is a potential that construction associated with the Whole Site Modernization project category could involve major grading or ground disturbance or could occur on undeveloped portions of existing school sites. In addition, the Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project category includes deep excavation for swimming pools. Ground-disturbing activities on undeveloped land or extensive grading and excavation would remove topsoil and could result in soil erosion if the soils are prone to erosion. Erosion related to stormwater runoff is discussed in Section 4.9.

Soils mapped under each school site vary in classification, and there are numerous soil types throughout the Program area. See Table 1 in Appendix G for a list of mapped soils and their erosion potential organized by cluster. Each cluster contains soils with some potential for erosion. Therefore, these project categories would potentially result in substantial soil erosion or the loss of topsoil, and impacts would be potentially significant **(Impact-GEO-2)**.

Implementation of **MM-HWQ-1** would be required, which would ensure implementation of appropriate construction BMPs for erosion control. BMPs could include, but would not be limited to, minimization of the exposure time of disturbed areas through the use of sand bags, gravel, hale bales, etc.; surrounding the site with perimeter controls such as gravel bags; storage of building and construction materials on site; or covering temporary piles of soil/dirt with tarps. Implementation of these, or similar, BMPs would minimize the potential for soil erosion to occur. Therefore, compliance with **MM-HWQ-1** would reduce impacts of the whole site modernization and joint-use facilities projects related to substantial soil erosion or loss of topsoil during construction activities. With implementation of **MM-HWQ-1**, **Impact-GEO-2** would be reduced to less than significant.

***Operation***

Operation of an existing school or joint-use facility would not involve ground-disturbing activities. Therefore, topsoil would not be removed during operation, and soils with erosion potential would not be exposed or otherwise disturbed. Furthermore, the District would be required to comply with their *Architect's Professional Services Manual*, which requires geotechnical field and laboratory tests to assess erosion potential. Impacts related to the potential for increased soil erosion due to the addition of impervious surfaces and stormwater runoff are discussed in Section 4.9. Impacts would be less than significant.

**Level of Significance Prior to Mitigation**

***Construction***

**Impact GEO-2: Potential to Result in Substantial Soil Erosion or the Loss of Topsoil during Construction of Whole Site Modernizations or Joint-Use Facilities.** Construction activities associated with new school or administrative facilities, whole site modernizations, or joint-use facilities could expose soils to the elements, which could cause substantial soil erosion or the loss of topsoil.

***Operation***

As discussed above, operational activities associated with whole site modernizations or joint-use facilities would result in less-than-significant impacts related to exposing soils to the elements, which could cause substantial soil erosion or the loss of topsoil.

**Mitigation Measures**

For **Impact-GEO-2:**

Implement **MM-HWQ-1**, as described above.

**Level of Significance After Mitigation**

***Construction***

Implementation of **MM-HWQ-1** would ensure appropriate construction BMPs are used for erosion control. BMPs could include, but would not be limited to, minimization of the exposure time of disturbed areas through the use of sand bags, gravel, hale bales, etc.; surrounding the site with perimeter controls such as gravel bags; storage of building and construction materials on site; or covering temporary piles of soil/dirt with tarps. Implementation of these, or similar, BMPs would minimize the potential for soil erosion to occur. Compliance with **MM-HWQ-1** would reduce impacts of whole site modernization and joint-use facilities projects related to substantial soil erosion or loss of topsoil during construction activities. Therefore, with implementation of **MM-HWQ-1**, **Impact-GEO-2** would be reduced to less than significant.

***Operation***

As discussed above, operational activities associated with whole site modernizations or joint-use facilities would result in less-than-significant impacts related to exposing soils to the elements, which could cause substantial soil erosion or the loss of topsoil.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Future projects associated with Upgrades of Existing School and Administrative Sites would be located on existing school and administration sites. This category involves minimal to no ground-disturbing activities, and any ground disturbance would occur on previously developed areas because the future projects would involve upgrades, maintenance, and repair to existing facilities.

Soils mapped under each school site vary in classification, and there are numerous soil types throughout the Program area. See Table 1 in Appendix G for a list of mapped soils and their erosion potential organized by cluster. While each cluster contains soils with some potential for erosion, these soils have likely been altered through cut and fill operations for previous development and therefore have a low potential for erosion within developed areas. Additionally, this project category would not result in a loss of topsoil because construction activities would occur at existing facilities on previously developed areas where the topsoil was already removed.

As a result, construction activities that would be reasonably foreseeable with implementation of the Upgrades of Existing School and Administrative Sites project category are unlikely to result in substantial soil erosion or loss of topsoil, and there would be no impacts.

#### *Operation*

Operation of an existing school or administrative facility would not involve ground-disturbing activities. Therefore, topsoil would not be removed during operation, and soils with erosion potential would not be exposed or otherwise disturbed. Furthermore, the District would be required to comply with their *Architect's Professional Services Manual*, which requires geotechnical field and laboratory tests to assess erosion potential. Impacts related to the potential for increased soil erosion due to the addition of impervious surfaces and stormwater runoff are discussed in Section 4.9. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with the Upgrades of Existing School and Administrative Sites project category would not result in substantial soil erosion or the loss of topsoil. There would be no impacts.

#### *Operation*

Operation of an existing school or administrative facility would not involve ground-disturbing activities. Therefore, the Upgrades of an Existing School and Administrative Sites project category would not result in substantial soil erosion or the loss of topsoil during operation. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with the Upgrades of Existing School and Administrative Sites project category would not result in substantial soil erosion or the loss of topsoil. There would be no impacts.

#### *Operation*

Operation of an existing school or administrative facility would not involve ground-disturbing activities. Therefore, the Upgrades of an Existing School and Administrative Sites project category would not result in substantial soil erosion or the loss of topsoil during operation. Impacts would be less than significant.

## Site-Specific Analysis

### Impact Discussion

#### Construction

Near-term, site-specific whole site modernization projects would be located on existing school and administration sites. Construction activities would involve minimal to no ground-disturbing activities, and any ground disturbance would occur on previously developed areas because the future projects would involve upgrades, maintenance, and repair to existing facilities.

Soils mapped under each school site vary in classification. See Table 1 in Appendix G for a list of mapped soils and their erosion potential organized by cluster. Site-specific schools are located within the Clairemont, Crawford, Henry, Hoover, Kearny, La Jolla, Lincoln, Madison, Mission Bay, Morse, Point Loma, and San Diego clusters, which all contain soils with moderate to high erosion potential. While soils with higher potential for erosion may occur at site-specific project sites, these soils have likely been altered through cut and fill operations for previous development and therefore have a low potential for erosion within developed areas. Additionally, site-specific projects would not result in a loss of topsoil because construction activities would occur at existing facilities on previously developed areas where the topsoil was already removed. As a result, construction activities associated with site-specific projects are unlikely to result in substantial soil erosion or loss of topsoil, and impacts would be less than significant.

#### Operation

Operation of near-term, site-specific whole site modernization projects would not involve ground-disturbing activities. Therefore, topsoil would not be removed during operation, and soils with erosion potential would not be exposed or otherwise disturbed. Furthermore, as described under *Program-Level Analysis* for this threshold, site-specific projects would be required to prepare geological and soil engineering studies in compliance with the District's *Architect's Professional Services Manual*. Impacts related to the potential for increased soil erosion due to the addition of impervious surfaces and stormwater runoff are discussed in Section 4.9. Therefore, impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### Construction

Construction activities associated with near-term, site-specific whole site modernization projects would not result in substantial soil erosion or loss of topsoil. Therefore, impacts would be less than significant.

#### Operation

Operation of an existing school or administrative facility would not involve ground-disturbing activities. Therefore, near-term, site-specific whole site modernization projects would not result in substantial soil erosion or the loss of topsoil during operation. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### Construction

Construction activities associated with near-term, site-specific whole site modernization projects would not result in substantial soil erosion or loss of topsoil. Therefore, impacts would be less than significant.

#### Operation

Operation of an existing school or administrative facility would not involve ground-disturbing activities. Therefore, near-term, site-specific whole site modernization projects would not result in substantial soil erosion or the loss of topsoil during operation. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

***Threshold 3: Would the Proposed Program be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in an on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities; Whole Site Modernization; Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

## Impact Discussion

### *Construction*

Construction of new structures, whether associated with a new school or administrative facility, an existing school or administrative facility, or a joint-use facility would require excavation and grading that could cause a geologic unit or soil to become unstable. In addition, the New Acquisition and New School or Administrative Facilities; Whole Site Modernization; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories could introduce new structures to areas that contain unstable geologic units or soil, which could increase the risk of damage to the structure or to construction equipment if an event were to occur. Impacts related to landslides and liquefaction are discussed in Threshold 1.

*Lateral Spreading*

As lateral spreading occurs when there are liquefiable soils, there is a potential for lateral spreading to occur within the Program area. Table 4.6-2 identifies the clusters that are located within areas susceptible to liquefaction; these include the Clairemont, Henry, Hoover, Kearny, Lincoln, Mira Mesa, Mission Bay, Point Loma, San Diego, Serra, and University City clusters. Therefore, new structures built as part of the New Acquisition and New School or Administrative Facilities; Whole Site Modernization; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories within these clusters could be located on a geologic unit or soil that is unstable and potentially result in lateral spreading. As discussed in Threshold 1, these structures would be at risk for loss, damage, or destruction if a seismic activity were to occur and triggered lateral spreading. However, the District would be required to comply with their *Architect's Professional Services Manual,* which requires geotechnical evaluations; the CBC; DSA requirements; and CDE standards. As detailed under Threshold 1, these include requirements for identifying soil strengths and implementing recommendations to eliminate risks associated with unstable soils or geologic units. As such, impacts associated with lateral spreading would be less than significant.

*Subsidence*

The primary activities that could impact subsidence include oil extraction and dewatering activities, neither of which would occur during construction associated with new school or administrative facilities. In addition, underlying geologic formations within San Diego County have a low potential of subsidence, and there are no historical records of subsidence events in San Diego County (County of San Diego 2010, USGS 2019). Therefore, no impacts would occur.

*Collapse*

Soils within the Program area may be loosely or inadequately compacted, may contain oversize materials unsuitable for reuse in engineered fills, and may contain unsuitable organic or expansive materials and debris that may preclude their use in engineered fills (Appendix G). If grading and excavation activities during construction are located on these soils, substantial shifting of soils could occur. This could result in creating soil instability where it did not previously exist. In addition, buildings constructed on collapsible soils may be subject to excessive settlement-related distress, which could result in damages. Therefore, new structures built as part of the New Acquisition and New School or Administrative Facilities; Whole Site Modernization; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories within the Clairemont, Henry, Kearny, La Jolla, Lincoln, Mira Mesa, Morse, Scrips Ranch, Serra, University City

clusters could be located on a geologic unit or soil that is unstable and potentially result in soil collapse. However, the District would be required to comply with their *Architect's Professional Services Manual*, which requires geotechnical evaluations; the CBC; DSA requirements; and CDE standards. As such, impacts associated with collapse would be less than significant.

***Operation***

Operation of an existing or new school, charter school, administrative facility, or joint-use facility would not involve ground-disturbing activities because operational activities are focused on education. If unstable soils are present on a school or administrative facility site, the proper controls would be implemented during construction to ensure that damage to new structures would not occur as a result of lateral spreading, subsidence, or collapse. Therefore, there would be no impacts related to unstable soils during operation.

### Level of Significance Prior to Mitigation

***Construction***

Construction activities associated with New Acquisition and New School or Administrative Facilities; Whole Site Modernization; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories would not be located on a geologic unit or soil that is unstable and potentially result in lateral spreading, subsidence, or collapse. Impacts would be less than significant.

***Operation***

Operation of an existing or new school, charter school, administrative facility, or joint-use facility would not involve activities that would cause a geologic unit or soil to become unstable or exacerbate unstable soil in a way that would potentially result in lateral spreading, subsidence, or collapse. No impacts would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

***Construction***

Construction activities associated with New Acquisition and New School or Administrative Facilities; Whole Site Modernization; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories would not be located on a geologic unit or soil that is unstable and potentially result in lateral spreading, subsidence, or collapse. Impacts would be less than significant.

***Operation***

Operation of an existing or new school, charter school, administrative facility, or joint-use facility would not involve activities that would cause a geologic unit or soil to become unstable or exacerbate unstable soil in a way that would potentially result in lateral spreading, subsidence, or collapse. No impacts would occur.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Future projects associated with the Upgrades of Existing School and Administrative Sites project category would be located on existing school and administration sites. This category would also involve minimal to no ground-disturbing activities, and any ground disturbance would occur on previously developed areas because the future projects would involve upgrades, maintenance, and repair to existing facilities. Therefore, the geologic unit or soil would not be unstable, and the minor excavation activities would not cause the unit or soil to become unstable. Because any upgrades constructed on existing school and administrative sites would not occur on a geologic unit or soil that would potentially result in lateral spreading, subsidence, or collapse, impacts would be less than significant.

#### *Operation*

Operation of an existing school or administrative facility would not involve ground-disturbing activities because operational activities are focused on education. If unstable soils are present on a school or administrative facility site, the proper controls would be implemented during construction to ensure that damage to new structures would not occur as a result of lateral spreading, subsidence, or collapse. Therefore, there would be no impacts related to unstable soils during operation.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with the Upgrades of Existing School and Administrative Sites project category would not be constructed on a geologic unit or soil that would potentially result in lateral spreading, subsidence, or collapse. Impacts would be less than significant.

#### *Operation*

Operation of an existing school or administrative facility would not involve activities that would cause a geologic unit or soil to become unstable or exacerbate unstable soil in a way that would potentially result in lateral spreading, subsidence, or collapse. No impacts would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with the Upgrades of Existing School and Administrative Sites project category would not be constructed on a geologic unit or soil that would potentially result in lateral spreading, subsidence, or collapse. Impacts would be less than significant.

#### *Operation*

Operation of an existing school or administrative facility would not involve activities that would cause a geologic unit or soil to become unstable or exacerbate unstable soil in a way that would potentially result in lateral spreading, subsidence, or collapse. Therefore, no impacts would occur.

## Site-Specific Analysis

### Impact Discussion

#### Construction

Construction activities associated with near-term, site-specific whole site modernization projects would require excavation and grading that could cause a geologic unit or soil to become unstable. In addition, site-specific projects could introduce new structures to areas that contain unstable geologic units or soil, which could increase the risk of damage to the structure or to construction equipment if an event were to occur. Impacts related to landslides and liquefaction are discussed in Threshold 1.

#### *Lateral Spreading*

Barnard Elementary is located within an area mapped with a high potential for liquefaction. New structures built as part of the site-specific projects could be located on a geologic unit or soil that is unstable and potentially result in lateral spreading. As discussed under Threshold 1, these structures would be at risk for loss, damage, or destruction if a seismic activity were to occur and triggered lateral spreading. However, as described under *Program-Level Analysis*, site-specific projects would be required to comply with the District's *Architect's Professional Services Manual*, which requires geotechnical evaluations; the CBC; DSA requirements; and CDE standards. These requirements would ensure that any unstable soils or geologic units are identified prior to construction activities and would include recommendations that would reduce risks associated with unstable soils and geologic units. As such, impacts associated with lateral spreading would be less than significant.

#### *Subsidence*

The primary activities that could impact subsidence include oil extraction and dewatering activities, neither of which would occur during site-specific project construction activities. In addition, underlying geologic formations within San Diego County have a low potential of subsidence, and there are no historical records of subsidence events in San Diego County (County of San Diego 2010, USGS 2019). Therefore, no impacts would occur.

#### *Collapse*

Soils underlying site-specific project sites may be loosely or inadequately compacted, may contain oversize materials unsuitable for reuse in engineered fills, and may contain unsuitable organic or expansive materials and debris that may preclude their use in engineered fills (Appendix G). As described under *Program-Level* above, if grading and excavation activities during construction are located on these soils, substantial shifting of soils could occur, which could result in creating soil instability where it did not previously exist. Therefore, site-specific projects may include the construction of new structures that could be located on a geologic unit or soil that is unstable and

potentially result in soil collapse. However, site-specific projects would be required to comply with the District's *Architect's Professional Services Manual,* which requires geotechnical evaluations; the CBC; DSA requirements; and CDE standards. As such, impacts associated with collapse would be less than significant.

#### Operation

Operation of near-term, site-specific whole site modernization projects would not involve ground-disturbing activities because operational activities are focused on education. If unstable soils are present on a school or administrative facility site, the proper controls would be implemented during construction to ensure that damage to new structures would not occur as a result of lateral spreading, subsidence, or collapse. Therefore, no impacts related to unstable soils during operation of site-specific projects would occur.

## Level of Significance Prior to Mitigation

#### Construction

Construction of near-term, site-specific whole site modernization projects would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in an on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be less than significant.

#### Operation

Operation of near-term, site-specific whole site modernization projects would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in an on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

#### Construction

Construction of near-term, site-specific whole site modernization projects would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in an on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be less than significant.

#### Operation

Construction and operation of near-term, site-specific whole site modernization projects would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in an on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be less than significant.

***Threshold 4: Would the Proposed Program 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?***

# Program-Level Analysis

## New Acquisition and New School or Administrative Facilities

### Impact Discussion

#### *Construction*

There is the potential for expansive soils to be located within the Program area, as defined by Table 18-1-B of the Uniform Building Code. Potential future school and administrative sites are underlain by a variety of soil types, which may have shrink-swell potential. New structures associated with this project category could be built on undeveloped areas that contain expansive soils. If the moisture content in these soils were to change and cause shrinking or swelling, the new structures could experience severe distress, including tiling or cracking of foundations. However, the District would be required to comply with their *Architect's Professional Services Manual*, which requires geotechnical evaluations, and DSA requirements for this project category. These regulations require identification of soil strength and measures to correct for any deficiencies that could increase risks to life or property. As such, impacts associated with expansive soil, creating substantial direct or indirect risks to life and property, would be less than significant.

#### *Operation*

Operational activities at future schools, including charter schools, and administrative facilities would not involve ground disturbance or the construction of new buildings because the focus of operations is educational. Therefore, risks to property as a result of being located on expansive soils would not occur. Operation of new schools would bring new students and staff to the school site. If a future school site is located on expansive soils, the new structures could experience severe distress during a shrink or swell event, which could create a substantial risk of life to students and staff. However, as stated above, the District would be required to comply with their *Architect's Professional Services Manual* and DSA requirements, which would identify soil strength and measures to correct for any deficiencies. As such, impacts associated with expansive soil, creating substantial direct or indirect risks to life and property, would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction associated with New Acquisition and New School or Administrative Facilities projects would not place structures on expansive soils and thus would not create substantial direct or indirect risks to life or property. Impacts would be less than significant.

#### *Operation*

Operation of the New Acquisition and New School or Administrative Facilities project category would not place structures on expansive soils and thus would not create substantial direct or indirect risks to life or property. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction of projects under the New Acquisition and New School or Administrative Facilities category would not place structures on expansive soils and thus would not create substantial direct or indirect risks to life or property. Impacts would be less than significant.

#### *Operation*

Operation of the New Acquisition and New School or Administrative Facilities project category would not place structures on expansive soils and thus would not create substantial direct or indirect risks to life or property. Impacts would be less than significant.

## Whole Site Modernization and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

There is the potential for expansive soils to be located within the Program area, as defined by Table 18-1-B of the Uniform Building Code. Existing school and joint-use sites are underlain by a variety of soil types, which may have shrink-swell potential. New structures associated with these project categories could be built on undeveloped areas that contain expansive soils. If the moisture content in these soils were to change and cause shrinking or swelling, the new structures could experience severe distress, including tiling or cracking of foundations. However, the District would be required to comply with their *Architect's Professional Services Manual*, which requires geotechnical evaluations, and DSA requirements for these project categories. These regulations require identification of soil strength and measures to correct for any deficiencies that could increase risks to life or property. As such, impacts associated with expansive soil, creating substantial direct or indirect risks to life and property, would be less than significant.

#### *Operation*

The Whole Site Modernization and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories do not include a change in current operations at existing school sites. No new students or staff would be introduced to the area or be exposed to risk from expansive soils, and there would be no change in the existing condition as a result of operations associated with a whole site modernization or joint-use facility development. Therefore, these project

categories would not create substantial direct or indirect risks to life or property as a result of being located on expansive soils, and impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction of projects under the Whole Site Modernization and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program categories would not place structures on expansive soils and thus would not create substantial direct or indirect risks to life or property. Impacts would be less than significant.

#### *Operation*

The Whole Site Modernization and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories do not include a change in current operations at existing school sites. Therefore, impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction of projects under the Whole Site Modernization and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program categories would not place structures on expansive soils and thus would not create substantial direct or indirect risks to life or property. Impacts would be less than significant.

#### *Operation*

The Whole Site Modernization and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories do not include a change in current operations at existing school sites. Therefore, impacts would be less than significant.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

The Upgrades of Existing School and Administrative Sites project category does not include the construction of new structures, only upgrading, improving, or maintaining existing structures. In addition, any ground-disturbing activities would be minimal and contained to previously disturbed areas. Therefore, this project category would not place structures on expansive soils and thus would not create substantial direct or indirect risks to life or property. Impacts would be less than significant.

#### *Operation*

The Upgrades of Existing School and Administrative Sites project category does not include a change in current operations at existing school sites. No new students or staff would be introduced to the area or be exposed to risk from expansive soils, and there would be no change in the existing condition as a result of operations following an upgrade of an existing school or administrative site. Therefore, operational activities associated with upgrades of existing school and administrative sites would not create substantial direct or indirect risks to life or property as a result of being located on expansive soils, and impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

The Upgrades of Existing School and Administrative Sites project category does not include the construction of new structures. Any ground-disturbing activities would be minimal and contained to previously disturbed areas. Therefore, this project category would not place structures on expansive soils and thus would not create substantial direct or indirect risks to life or property. Impacts would be less than significant.

#### *Operation*

The Upgrades of Existing School and Administrative Sites project category does not include a change in current operations at existing school sites. Therefore, impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

The Upgrades of Existing School and Administrative Sites project category would not place structures on expansive soils and thus would not create substantial direct or indirect risks to life or property. Impacts would be less than significant.

#### *Operation*

The Upgrades of Existing School and Administrative Sites project category does not include a change in current operations at existing school sites. Impacts would be less than significant.

## Site-Specific Analysis

### Impact Discussion

### Construction

There is the potential for expansive soils to be located within the near-term, site-specific whole site modernization project sites, as defined by Table 18-1-B of the Uniform Building Code. Existing site-specific schools are underlain by a variety of soil types, which may have shrink-swell potential. New structures could be built on undeveloped areas that contain expansive soils. If the moisture content

in these soils were to change and cause shrinking or swelling, the new structures could experience severe distress, including tiling or cracking of foundations. However, as discussed under the *Program-Level Analysis* for this threshold, site-specific projects would be required to comply with the District's *Architect's Professional Services Manual*, which requires geotechnical evaluations, and DSA requirements. These regulations require identification of soil strength and measures to correct for any deficiencies that could increase risks to life or property. As such, impacts associated with expansive soil, creating substantial direct or indirect risks to life and property, would be less than significant.

#### Operation

Near-term, site-specific whole site modernization projects do not include a change in current operations at existing school sites. Therefore, no new students or staff would be introduced to the area or be exposed to risk from expansive soils, and there would be no change in the existing condition as a result of operations. Therefore, site-specific projects would not create substantial direct or indirect risks to life or property as a result of being located on expansive soils, and impacts would be less than significant.

## Level of Significance Prior to Mitigation

#### Construction

Construction of near-term, site-specific whole site modernization projects would not 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. Impacts would be less than significant.

#### Operation

Operation of near-term, site-specific whole site modernization projects would not 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. Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

#### Construction

Construction of near-term, site-specific whole site modernization projects would not 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. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

#### Operation

Operation of near-term, site-specific whole site modernization projects would not 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. Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

# Section 4.7
# Greenhouse Gas Emissions

## 4.7.1 Overview

This section describes the existing conditions and applicable laws and regulations for greenhouse gas (GHG) emissions, followed by an analysis of the Proposed Program's potential to: (1) generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and (2) conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Table 4.7-1 summarizes the significant impacts and mitigation measures (MM) discussed in Section 4.7.4, *Impacts and Mitigation Measures*.

**Table 4.7-1. Summary of Significant Greenhouse Gas Emissions and Climate Change Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **District-Wide (Applies to All Capital Improvement Projects)** | | | |
| District-wide impacts identified. | **MM-AQ-2**: Require Construction Fleet to Use Renewable Diesel<br>**MM-GHG-1:** Implement Best Management Practices During Construction<br>**MM-GHG-2:** Incorporate Sustainable Design Features | Significant and Unavoidable | Mitigation would reduce GHG emissions from construction activities and operations of the Proposed Program, but because it cannot be stated with certainty that the reductions would fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan, impacts would remain significant and unavoidable. |
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact-GHG-1:** Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environmental During Construction; | **MM-AQ-2**: Require Construction Fleet to Use Renewable Diesel<br>**MM-GHG-1:** Implement Best Management Practices During Construction<br>**MM-GHG-2:** Incorporate | Significant and Unavoidable | Mitigation would reduce GHG emissions from construction activities and operations of the Proposed Program, but because it cannot be stated with certainty that the reductions |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-GHG-2:** Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Operation;<br>**Impact-GHG-3:** Potential to Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases | Sustainable Design Features | | would fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan, impacts would remain significant and unavoidable. |
| **Whole Site Modernization** | | | |
| **Impact-GHG-1:** Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environmental During Construction;<br>**Impact-GHG-2:** Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Operation;<br>**Impact-GHG-3:** Potential to Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases | **MM-AQ-2**: Require Construction Fleet to Use Renewable Diesel<br>**MM-GHG-1:** Implement Best Management Practices During Construction<br>**MM-GHG-2:** Incorporate Sustainable Design Features | Significant and Unavoidable | Mitigation would reduce GHG emissions from construction activities and operations of the Proposed Program, but because it cannot be stated with certainty that the reductions would fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan, impacts would remain significant and unavoidable. |
| **Upgrades of Existing School and Administrative Sites** | | | |
| **Impact-GHG-1:** Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environmental During Construction;<br>**Impact-GHG-2:** Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that | **MM-AQ-2**: Require Construction Fleet to Use Renewable Diesel<br>**MM-GHG-1:** Implement Best Management Practices During Construction<br>**MM-GHG-2:** Incorporate Sustainable Design Features | Significant and Unavoidable | Mitigation would reduce GHG emissions from construction activities and operations of the Proposed Program, but because it cannot be stated with certainty that the reductions would fully assist the District in meeting the state's 2030 emissions |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| May Have a Significant Impact on the Environment During Operation;<br>**Impact-GHG-3:** Potential to Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases | | | reduction target and ensure consistency with the 2017 Scoping Plan, impacts would remain significant and unavoidable. |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| **Impact-GHG-1:** Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environmental During Construction;<br>**Impact-GHG-2:** Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Operation;<br>**Impact-GHG-3:** Potential to Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases | **MM-AQ-2**: Require Construction Fleet to Use Renewable Diesel<br>**MM-GHG-1:** Implement Best Management Practices During Construction<br>**MM-GHG-2:** Incorporate Sustainable Design Features | Significant and Unavoidable | Mitigation would reduce GHG emissions from construction activities and operations of the Proposed Program, but because it cannot be stated with certainty that the reductions would fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan, impacts would remain significant and unavoidable. |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| **Impact-GHG-1:** Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environmental During Construction;<br>**Impact-GHG-2:** Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Operation; | **MM-AQ-2**: Require Construction Fleet to Use Renewable Diesel<br>**MM-GHG-1:** Implement Best Management Practices During Construction<br>**MM-GHG-2:** Incorporate Sustainable Design Features | Significant and Unavoidable | Mitigation would reduce GHG emissions from construction activities and operations of the Proposed Program, but because it cannot be stated with certainty that the reductions would fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan, impacts would |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-GHG-3:** Potential to Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases | | | remain significant and unavoidable. |

# 4.7.2 Existing Conditions

The unique chemical properties of GHGs enable them to become well-mixed in the atmosphere and transported over long distances. Consequently, unlike other resource areas that are primarily concerned with localized project impacts (e.g., within 1,000 feet of the project site), the global nature of climate change requires a broader analysis approach. Accordingly, the study area for the GHG analysis includes the entire state and global atmosphere.

The following subsections provide background information on global climate change and principal GHGs associated with implementation of the Proposed Program. Potential impacts of climate change within California are also identified.

## 4.7.2.1 Climate Change

The process known as the *greenhouse effect* keeps the atmosphere near Earth's surface warm enough for the successful habitation of humans and other life forms. The greenhouse effect is created by sunlight that passes through the atmosphere. Some of the sunlight striking Earth is absorbed and converted to heat, which warms the surface. The surface emits a portion of this heat as infrared radiation, some of which is re-emitted toward the surface by GHGs. Human activities that generate GHGs increase the amount of infrared radiation absorbed by the atmosphere, thus enhancing the greenhouse effect and amplifying the warming of Earth.

Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere since the Industrial Revolution (IPCC 2018). Rising atmospheric concentrations of GHGs in excess of natural levels result in increasing global surface temperatures—a process commonly referred to as *global warming*. Higher global surface temperatures, in turn, result in changes to Earth's climate system, including increased ocean temperature and acidity, reduced sea ice, variable precipitation, and increased frequency and intensity of extreme weather events (Intergovernmental Panel on Climate Change 2018). Large-scale changes to Earth's system are collectively referred to as *climate change.*

The Intergovernmental Panel on Climate Change (IPCC) was established by the World Meteorological Organization and United Nations Environment Programme to assess scientific, technical, and socioeconomic information relevant to the understanding of climate change, its potential impacts, and options for adaptation and mitigation. The IPCC estimates that human-induced warming reached approximately 1 degree Celsius (°C) above pre-industrial levels in 2017, increasing at 0.2°C per decade. Under the current nationally determined contributions of mitigation

from each country until 2030, global warming is expected to rise to 3°C by 2100, with warming to continue afterwards (IPCC 2018). Large increases in global temperatures could have substantial adverse effects on the natural and human environments worldwide and in California.

### 4.7.2.2 Greenhouse Gas Emissions

The principle anthropogenic (human-made) GHGs contributing to global warming are carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), and fluorinated compounds, including sulfur hexafluoride ($SF_6$), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs). Water vapor, the most abundant GHG, is not included in this list because its natural concentrations and fluctuations far outweigh its anthropogenic sources.

The primary GHGs of concern associated with the Proposed Program are $CO_2$, $CH_4$, and $N_2O$. Principal characteristics of these pollutants are discussed below. Fluorinated compounds ($SF_6$, HFCs, and PFCs) are not of primary concern because they are commonly used in commercial and industrial sectors for refrigeration, air conditioning, and insultation purposes.

**Carbon dioxide** enters the atmosphere through fossil fuels (oil, natural gas, and coal) combustion, solid waste decomposition, plant and animal respiration, and chemical reactions (e.g., manufacture of cement). $CO_2$ is also removed from the atmosphere (or *sequestered*) when it is absorbed by plants as part of the biological carbon cycle.

**Methane** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal solid waste landfills.

**Nitrous oxide** is emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste.

Methods have been set forth to describe emissions of GHGs in terms of a single gas to simplify reporting and analysis. The most commonly accepted method to compare GHG emissions is the *global warming potential* (GWP) methodology defined in IPCC reference documents. IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of carbon dioxide equivalent ($CO_2e$), which compares the gas in question to that of the same mass of $CO_2$ ($CO_2$ has a global warming potential of 1 by definition).

Table 4.7-2 lists the global warming potential of $CO_2$, $CH_4$, and $N_2O$ and their lifetimes in the atmosphere.

**Table 4.7-2. Lifetimes and Global Warming Potentials of Key Greenhouse Gases**

| Greenhouse Gas | Global Warming Potential (100 years) | Lifetime (years) |
|---|---|---|
| Carbon Dioxide | 1 | 5–200 |
| Methane | 25 | 12 |
| Nitrous Oxide | 298 | 114 |

Source: CARB 2019a, IPCC 2001.

All GWPs used for the California Air Resources Board's (CARB's) GHG inventory and to assess attainment of the state's 2020 and 2030 reduction targets are considered over a 100-year timeframe (as shown in Table 4.7-2). However, CARB recognizes the importance of short-lived climate pollutants (SLCPs) and reducing these emissions to achieve the state's overall climate change goals. SLCPs have atmospheric lifetimes on the order of a few days to a few decades, and their relative climate forcing impacts, when measured in terms of how they heat the atmosphere, can be tens, hundreds, or even thousands of times greater than that of $CO_2$ (CARB 2017a). Recognizing their short-term lifespan and warming impact, SLCPs are measured in terms of $CO_2e$ using a 20-year time period. The use of GWPs with a time horizon of 20 years better captures the importance of the SLCPs and gives a better perspective on the speed at which SLCP emission controls will impact the atmosphere relative to $CO_2$ emission controls. The SLCP Reduction Strategy, which is discussed in Section 4.7.3.3, *State*, addresses the three primary SLCPs—$CH_4$, HFC gases, and anthropogenic black carbon. Methane has lifetime of 12 years and a 20-year GWP of 72. HFC gases have lifetimes of 1.4 to 52 years and a 20-year GWP of 437 to 6,350. Anthropogenic black carbon has a lifetime of a few days to weeks and a 20-year GWP of 3,200. The Proposed Program would generate $CH_4$ from sources such as waste, but is not anticipated to generate significant amounts of HFC gases and black carbon, which primarily result from use of refrigerants and fuel combustion in the industrial and power sectors (CARB 2017a).

### 4.7.2.3 Greenhouse Gas Reporting

A GHG inventory is a quantification of all GHG emissions and sinks[1] within a selected physical and/or economic boundary. GHG inventories can be performed on a large scale (e.g., for global and national entities) or on a small scale (e.g., for a building or person). Although many processes are difficult to evaluate, several agencies have developed tools to quantify emissions from certain sources. Table 4.7-3 outlines the most recent global, national, statewide, and local GHG inventories to help contextualize the magnitude of potential project-related emissions.

**Table 4.7-3. Global, National, State, and Regional Greenhouse Gas Emission Inventories**

| Emissions Inventory | $CO_2e$ (metric tons) |
|---|---|
| 2017 IPCC Global GHG Emissions Inventory | 53,500,000,000 |
| 2018 EPA National GHG Emissions Inventory | 6,677,000,000 |
| 2018 CARB State GHG Emissions Inventory | 425,300,000 |
| 2012 San Diego Regional Inventory | 35,000,000 |
| 2010 City of San Diego Emissions Inventory | 12,984,993 |

Source: United Nations 2018, EPA 2020, CARB 2019b, SANDAG 2015, City of San Diego 2015a.

Climate change is a global problem and GHGs are global pollutants, unlike criteria air pollutants (such as ozone precursors), which are primarily pollutants of regional and local concern. Given the long atmospheric lifetimes of GHGs, GHGs emitted by many sources worldwide accumulate in the atmosphere. No single emitter of GHGs is large enough to trigger global climate change on its own. Rather, climate change is the result of the individual contributions of countless past, present, and

[1] A GHG sink is a process, activity, or mechanism that removes a GHG from the atmosphere.

future sources. Thus, GHG impacts are inherently cumulative, and the analysis below is inclusive of cumulative impacts.

# 4.7.3 Applicable Laws and Regulations

## 4.7.3.1 International

In 2015, the 21st session of the Conference of Parties (COP21) took place in Paris, France. The session included representatives from 196 parties to the United Nations Framework Convention on Climate Change. The outcomes from the Paris Agreement at COP21 include, but are not limited to, limiting global temperature increase well below 2°C, establishing binding commitments by all parties to make Nationally Determined Contributions (NDC) and to pursue domestic policies aimed at achieving NDCs, and regular reporting by all countries on their emissions and progress made in implementing and achieving their NDCs. In April 2016, 174 states and the European Union signed the agreement. In June 2017, former President Donald Trump announced his intention to withdraw from the Paris Agreement. Under the terms of the agreement, the United States cannot officially announce its resignation until November 4, 2019. Subsequently, withdrawal would be effective 1 year after notification in 2020. However, on January 20, 2021, President Joseph Biden signed an executive order to have the United States rejoin the Paris Agreement (NPR 2021).

The Under2 Coalition is an international coalition of jurisdictions that signed the Global Climate Leadership Memorandum of Understanding (Under2 MOU) following President Trump's decision to withdraw from the Paris Agreement. The Under2 MOU aims to limit global warming to 2°C, to limit GHGs to below 80 to 95% below 1990 levels, and/or achieve a per capita annual emissions goal of less than 2 metric tons (MT) by 2050. The Under2 MOU has been signed or endorsed by 135 jurisdictions (including California) that represent 32 countries and 6 continents.

## 4.7.3.2 Federal

There is currently no federal overarching law specifically related to climate change or the reduction of GHG emissions. Under the Obama Administration, the United States Environmental Protection Agency (EPA) had been developing regulations under the Clean Air Act (CAA) pursuant to EPA's authority. There have also been settlement agreements between EPAEPA, several states, and nongovernmental organizations to address GHG emissions from electric generating units and refineries, as well as the EPAEPA's issuance of an "Endangerment Finding" and a "Cause or Contribute Finding." EPAEPA has also adopted a Mandatory Reporting Rule and Clean Power Plan. Under the Clean Power Plan, EPAEPA issued regulations to control $CO_2$ emissions from new and existing coal-fired power plants. However, on February 9, 2016, the Supreme Court issued a stay of these regulations pending litigation. Former EPAEPA Administrator Scott Pruitt also signed a measure to repeal the Clean Power Plan. The fate of the proposed regulations is uncertain given the change in federal administrations and the pending deliberations in federal courts.

The National Highway Traffic Safety Administration (NHTSA) sets the Corporate Average Fuel Economy (CAFÉ) standards to improve the average fuel economy and reduce GHG emissions generated by cars and light duty trucks. NHTSA and EPAEPA have proposed to amend the current fuel efficiency standards for passenger cars and light trucks and establish new standards covering model years 2021 through 2026 by maintaining the current model year 2020 standards through

2026 (Safer Affordable Fuel-Efficient [SAFE] Vehicles Rule). California, 22 other states, the District of Columbia, and two cities filed suit against the proposed action on September 20, 2019 (*California et al. v. United States Department of Transportation et al*., 1:19-cv-02826, U.S. District Court for the District of Columbia). The lawsuit requests a "permanent injunction prohibiting Defendants from implementing or relying on the Preemption Regulation," but does not stay its implementation during legal deliberations. Part 1 of the SAFE Vehicles Rule went into effect on November 26, 2019. Part 2 of the Rule was finalized on April 30, 2020.

### 4.7.3.3 State

California has adopted statewide legislation addressing various aspects of climate change and GHG emissions reduction. The legislation establishes a broad framework for the state's long-term GHG reduction and climate change adaptation program. The governor of California has also issued several executive orders related to the state's evolving climate change policy. Summaries of key policies, regulations, and legislation at the state level that are relevant to the Proposed Program are described below.

#### Assembly Bill 1493

With the passage of Assembly Bill (AB) 1493, also known as Pavley I, in 2002, California launched an innovative and proactive approach to dealing with GHG emissions and climate change at the state level. AB 1493 requires CARB to develop and implement regulations to reduce automobile and light-truck GHG emissions. These stricter emissions standards were designed to apply to automobiles and light trucks beginning with the model year 2009. Although litigation challenged these regulations and the EPA initially denied California's related request for a waiver, the waiver request was granted. Additional strengthening of the Pavley standards (referred to previously as Pavley II and now referred to as the Advanced Clean Cars measure) was adopted for vehicle model years 2017–2025 in 2012. Together, the two standards are expected to increase average fuel economy to roughly 54.5 miles per gallon in 2025.

#### Executive Order S-3-05

California Executive Order (EO) S-3-05 sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million $MTCO_2e$); by 2020, reduce emissions to 1990 levels (approximately 427 million $MTCO_2e$); and by 2050, reduce emissions to 80% below 1990 levels (approximately 85 million $MTCO_2e$). Executive orders are binding only on state agencies. Accordingly, California EO S-3-05 will guide state agencies' efforts to control and regulate GHG emissions but will have no direct binding effect on local government or private actions. The Secretary of the California Environmental Protection Agency is required to report to the Governor and state legislature biannually on the impacts of global warming on California, mitigation and adaptation plans, and progress made toward reducing GHG emissions to meet the targets established in this executive order.

#### Cap-and-Trade Program

CARB adopted the Cap-and-Trade program in October 2011. The California Cap-and-Trade program is a market-based system with an overall emissions limit for affected emission sources. Affected sources include in-state electricity generators, hydrogen production, petroleum refining, and other

large-scale manufacturers and fuel suppliers and distributors. The original Cap-and-Trade program set a compliance schedule through 2020. AB 398 extends the program through 2030 and requires CARB to make refinements, including establishing a price ceiling. Revenue generated from the Cap-and-Trade program is used to fund various programs. AB 398 established post-2020 funding priorities, to include (1) Air Toxics and Criteria Pollutants, (2) Low and Zero Carbon Transportation, (3) Sustainable Agricultural Practices, (4) Healthy Forests and Urban Greening, (5) Short-lived Climate Pollutants, (6) Climate Adaptation and Resiliency, and (7) Climate and Clean Energy Research.

## Senate Bills 1078, 107, and X1-2

Senate Bills (SBs) 1078 and 107, California's Renewables Portfolio Standard (RPS), obligates investor-owned utilities (IOUs), energy service providers (ESPs), and Community Choice Aggregations (CCAs) to procure an additional 1% of retail sales per year from eligible renewable sources until 20% is reached, no later than 2010. The California Public Utilities Commission (CPUC) and California Energy Commission (CEC) are jointly responsible for implementing the program. SB X1-2 (2011) set forth a longer-range target of procuring 33% of retail sales by 2020.

## Assembly Bill 32

One goal of EO S-03-05 was further reinforced by AB 32 (Chapter 488, Statutes of 2006), the Global Warming Solutions Act of 2006, which requires the state to reduce GHG emissions to 1990 levels by 2020. Since AB 32 was adopted, CARB, CEC, CPUC, and the Building Standards Commission have been developing regulations that will help meet the goals of AB 32. Under AB 32, CARB is required to prepare a Scoping Plan and update it every 5 years. The Scoping Plan was approved in 2008, the first update was approved in 2014, and an additional update was approved in 2017 (see *Senate Bill 32 and Assembly Bill 197* below). The Scoping Plan identifies specific measures to reduce GHG emissions to 1990 levels by 2020, and requires CARB and other state agencies to develop and enforce regulations and other initiatives for reducing GHGs. Specifically, the AB 32 Scoping Plan articulates a key role for local governments, recommending they establish GHG reduction goals for both their municipal operations and the community consistent with those of the state.

## Assembly Bill 939 and Assembly Bill 341

To minimize the amount of solid waste that must be disposed of in landfills, the state Legislature passed the California Integrated Waste Management Act of 1989 (AB 939), effective January 1990. According to AB 939, all cities and counties were required to divert 25% of all solid waste from landfill facilities by January 1, 1995, and 50% by January 1, 2000. Through other statutes and regulations, this 50% diversion rate also applies to state agencies. In order of priority, waste reduction efforts must promote source reduction, recycling and composting, and environmentally safe transformation and land disposal.

In 2011, AB 341 modified the California Integrated Waste Management Act and directed CalRecycle to develop and adopt regulations for mandatory commercial recycling. The resulting Mandatory Commercial Recycling Regulation (2012) requires that on and after July 1, 2012, certain businesses that generate 4 cubic yards or more of commercial solid waste per week must arrange recycling services. To comply with this requirement, businesses may either separate recyclables and self-haul them or subscribe to a recycling service that includes mixed waste processing. AB 341 also

established a statewide recycling goal of 75%; the 50% disposal reduction mandate still applies for cities and counties under AB 939.

## Assembly Bill 827

AB 827 requires schools and school districts to participate in commercial recycling efforts (AB 341) and mandatory commercial organics recycling programs (AB 1826) (CalRecycle 2020). Schools and school districts must provide appropriate containers adjacent to solid waste containers to capture and divert recycling and organic waste. AB 827 is intended to educate and involve consumer's in achieving California's recycling goals.

## Senate Bill X7-7

SB X7-7, the Water Conservation Act of 2009, sets an overall goal of reducing per-capita urban water use by 20% by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10% by December 31, 2015. This in an implementing measure of the Water Sector of the AB 32 Scoping Plan that will continue to be implemented beyond 2020. Reduction in water consumption reduces the energy necessary and the associated emissions to convey, treat, and distribute the water; it also reduces emissions from wastewater treatment.

## Executive Order S-01-07—Low Carbon Fuel Standard

With EO S-01-07, Governor Arnold Schwarzenegger set forth the low carbon fuel standard (LCFS) for California in 2007. EO S-01-07 mandates (1) that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020, and (2) that an LCFS for transportation fuels be established in California. The EO initiates a research and regulatory process at CARB.

## Senate Bill 97

SB 97 required the Governor's Office of Planning and Research to develop recommended amendments to the CEQA guidelines for addressing GHG emissions. The amendments became effective on March 18, 2010.

## California Energy Efficiency Standards for Nonresidential Buildings—Green Building Code, Title 24 Update

California has adopted aggressive energy efficiency standards for new buildings and is continuously updating the standards. In 2008, the California Building Standards Commission adopted the nation's first "green" building standards, which included standards for many aspects of the built environment apart from energy efficiency. The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code (24 California Code of Regulations [CCR]). Part 11 established voluntary standards that became mandatory under the 2010 edition of the code. These involved sustainable site development, energy efficiency (in excess of California Energy Code requirements), water conservation, material conservation, and internal air contaminants.

On May 9, 2018, the CEC adopted the 2019 Building Energy Efficiency Standards, which will take effect on January 1, 2020. The 2019 standards will result in non-residential buildings being 30% more

energy efficient because the standards will update indoor and outdoor lighting to make maximum use of LED technology. Future standards are expected to result in zero net energy for newly constructed commercial buildings.

## Senate Bill 350—De Leon (Clean Energy and Pollution Reduction Act of 2015)

SB 350 was approved by the California legislature in September 2015 and signed by Governor Jerry Brown in October 2015. Its key provisions are to require the following by 2030: (1) a renewables portfolio standard of 50% and (2) a doubling of energy efficiency (electrical and natural gas) by 2030, including improvements to the efficiency of existing buildings. These mandates will be implemented by future actions of the CPUC and CEC.

## Senate Bill 32 and Assembly Bill 197

SB 32 requires CARB to ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by 2030. The companion bill, AB 197, creates requirements to form a Joint Legislative Committee on Climate Change Policies, requires CARB to prioritize direct emission reductions and consider social costs when adopting regulations to reduce GHG emissions beyond the 2020 statewide limit, requires CARB to prepare reports on sources of GHGs and other pollutants, establishes 6-year terms for voting members of CARB, and adds two legislators to CARB as non-voting members.

Pursuant to SB 32, CARB updated the prior AB 32 Scoping Plan to address implementation of GHG reduction strategies to meet the 2030 reduction target. The final plan was approved in December 2017. The 2017 Climate Change Scoping Plan Update (2017 Scoping Plan) continues the discussion from the original scoping plan and 2014 update of identifying scientifically backed policies within six of the state's economic sectors to reduce GHGs. The 2017 Scoping Plan includes various elements, including doubling energy efficiency savings, increasing the LCFS from 10 to 18%, adding 4.2 million zero-emission vehicles on the road, implementing the Sustainable Freight Strategy, implementing a post-2020 Cap-and-Trade Program, creating walkable communities with expanded mass transit and other alternatives to traveling by car, and developing an Integrated Natural and Working Lands Action Plan to protect land-based carbon sinks.

## Senate Bill 605 and Senate Bill 1383

SB 605 directed CARB, in coordination with other state agencies and local air districts, to develop a comprehensive SLCP Reduction Strategy. SB 1383 directed CARB to approve and implement the SLCP Reduction Strategy to achieve the following reductions in SLCPs.

- 40% reduction in methane below 2013 levels by 2030.
- 40% reduction in hydrofluorocarbon gases below 2013 levels by 2030.
- 50% reduction in anthropogenic black carbon below 2013 levels by 2030.

The bill also establishes the following targets for reducing organic waste in landfills and methane emissions from dairy and livestock operations.

- 50% reduction in organic waste disposal from the 2014 level by 2020.
- 75% reduction in organic waste disposal from the 2014 level by 2025.

- 40% reduction in methane emissions from livestock manure management operations and dairy manure management operations below the dairy sector's and livestock sector's 2013 levels by 2030.

CARB and CalRecycle are currently developing regulations to achieve the organic waste reduction goals under SB 1383. In January 2019 and June 2019, CalRecycle proposed new and amended regulations in Titles 14 and 27 of the California Code of Regulations. Among other things, the regulations set forth minimum standards for organic waste collection, hauling, and composting. The final regulations will take effect on or after January 1, 2022.

## Short-Lived Climate Pollutant Reduction Strategy

CARB adopted the SLCP Reduction Strategy in March 2017 as a framework for achieving the methane, hydrofluorocarbon, and anthropogenic black carbon reduction targets set by SB 1383. The SLCP Reduction Strategy includes 10 measures to SLCPs, which fit within a wide range of ongoing planning efforts throughout the state, including CARB's and CalRecycle's proposed rulemaking on organic waste diversion (discussed above).

## Senate Bill 100

The state's existing renewables portfolio standard requires all retail sellers to procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours of those products sold to their retail end-use customers achieve 25% of retail sales by December 31, 2016 (achieved), 33% by December 31, 2020, 40% by December 31, 2024, 45% by December 31, 2027, and 50% by December 31, 2030. SB 100 revises and extends these renewable resource targets to 50% by December 31, 2026, 60% December 31, 2030, and 100% (carbon-free) by December 31, 2045.

## Executive Order B-55-18

EO B-55-18 acknowledges the environmental, community, and public health risks posed by future climate change. It further recognizes the climate stabilization goal adopted by 194 states and the European Union under the Paris Agreement. While the United States was not party to the agreement, California is committed to meeting the Paris Agreement goals and going beyond them wherever possible. Based on the worldwide scientific agreement that carbon neutrality must be achieved by midcentury, EO B-55-18 establishes a new state goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. The EO charges CARB with developing a framework for implementing and tracking progress towards these goals. This EO extends EO S-3-05, but is only binding on state agencies. However, this EO is critical in meeting the state's long-term climate change goals.

## Senate Bill 743

SB 743 requires revisions to the State CEQA Guidelines that establish new impact analysis criteria for the assessment of a project's transportation impacts. The intent behind SB 743 and revising the State CEQA Guidelines is to integrate and better balance the needs of congestion management, infill development, active transportation, and GHG emissions reduction. The Office of Planning and Research (OPR) recommends that vehicle miles traveled (VMT) serve as the primary analysis metric, replacing the existing criteria of delay and level of service. In 2018, OPR released a technical

advisory outlining potential VMT significance thresholds for different project types and identified a series of potential measures to reduce VMT, including increasing "access to common goods and services, such as groceries, schools, and daycare." With respect to school uses, any net increase of VMT may indicate a significant transportation impact.

### California Energy Efficiency Strategic Plan

The CPUC adopted the state's first Long Term Energy Efficiency Strategic Plan in 2008. The plan provides a roadmap to achieve maximum energy savings across all major groups and sectors in California. The plan includes ambitious goals for development of zero net energy (ZNE) buildings. The goals were updated in 2017 as outlined below:

- All new residential construction will be (ZNE) by 2020.
- All new commercial construction will be ZNE by 2030,
- 50% of commercial buildings will be retrofit to ZNE by 2030.
- 50% of all new and major renovations of state buildings will be ZNE by 2025, 50 % at 2020.

### Assembly Bill 841

AB 841 would provide state funding for upgrading heating, ventilation, and air conditioning (HVAC) systems in public schools. Schools located in underserved communities and those located near freeways or industrial facilities would be prioritized. AB 841 would replace existing inefficient HVAC systems and would include new filters to reduce risk from COVID-19 and wildfire smoke. Funding would be provided through the *School Reopening Ventilation and Energy Efficiency Verification and Repair Program*. AB 841 would also include funds for public schools to replace noncompliant plumbing fixtures and appliances that fail to meet water efficiency standards and waste potable water and the energy used to convey the water, with water-conserving plumbing fixtures and appliances. Funds would be provided through the *School Noncompliant Plumbing Fixture and Appliance Program*.

## 4.7.3.4 Local

### San Diego Unified School District

The District has a dedicated team to ensure compliance with state and local goals for energy conservation, energy efficiency, and sustainability. The District formed the Environmental Sustainability Advisory Committee (ESAC) in 2013 to discuss a range of environmental sustainability activities, projects, and policies, which included the "Dream Big" ideas. The Board of Education (Board) approved the *Dream Big* initiatives in 2014. The District is also the first school district to develop a comprehensive plan to reduce GHG emissions. In 2016, the Board approved an agreement with the Climate Action Campaign to develop a comprehensive GHG reduction plan, which included GHG emission inventories, reduction targets, and various mitigation and adaptation strategies and goals (District 2017b). The GHG reduction plan was consistent with existing District policies for environmental accountability. The District's initiatives and programs are highlighted below.

## Dream Big

The *Dream Big* initiatives include a variety of measures ranging from energy efficiency to reducing food waste. Table 4.7-4 provides the recommendations for each measure. It should be noted that these are non-binding initiatives, and successful implementation of the measures is dependent upon adequate funding being awarded to the District through state bond measures. The District has made tremendous progress toward meeting some of the *Dream Big* initiatives, these include "Go Off-Grid with Solar by 2025," "Adopt Net Zero Energy by 2030," and "Flip the Switch to LED Lighting," All three ideas focus on reducing electricity, which is the District's second largest source of GHG emissions.

**Table 4.7-4. Environmental Sustainability Advisory Committee *Dream Big* Initiatives**

| Measure | Recommendation |
|---|---|
| Develop a Climate Action Plan (CAP) | • Consult with the University of San Diego Energy Policy Initiatives Center (EPIC), San Diego Gas & Electric, or experienced consultants to provide guidance for CAP development.<br>• The CAP would require input from a variety of stakeholders; in order to ensure organization and completeness of such a large and complex program with various stakeholders, an outside agency should be retained to conduct meetings and facilitate dialog.<br>• Create a staff position whose sole responsibility is to ensure implementation of the CAP. |
| Complete a Community Choice Aggregation (CCA) Feasibility Study | • Reach out to the City of San Diego to be included in their recommended CCA study to determine cost benefit analysis for inclusion of the District. |
| Go "Off-Grid" with Solar by 2025 | • Given the relatively near-term expiration of the California Solar Initiative (CSI) rebate, and the impending deadline imposed by AB 327, the District should consider concluding its solar research by the end of 2014 to allow for the possibility of the broadest options and cost savings. Some experts have indicated the District's energy consumption can be decreased by 50%, halving their solar needs. This should all be addressed in a CAP. |
| Adopt Net Zero Energy by 2030 | • Net Zero Energy is defined as a building's total energy consumption equal to its energy generations. To work towards Net Zero Energy, District buildings would continue to encourage and implement energy conservation and energy efficiency, manage energy demand, and generate renewable energy. |
| Flip the Switch to LED Lighting | • Require new construction and remodels to use LED lighting absent special circumstances.<br>• Replace parking lot and exterior lighting with comparable LED lighting to meet required security needs.<br>• As bulbs fail, replace with comparable lumen LED lights.<br>• Develop a plan and schedule per school to switch to LED lighting. |
| Maximize Water Conservation | • Replace all grass fields with artificial turf for one attack on the large water fraction going to irrigation. ($1.041 million savings annually).<br>• Actively replace landscaping with drought-tolerant planting to target another cost. |

| Measure | Recommendation |
|---|---|
| | • Complete connection of all irrigation lines to the District's master control system, which has been proven to save labor, control water leakage, and increase control of water usage.<br>• Utilize new leak detection, monitoring, and shutoff systems to minimize wasted water in school buildings.<br>• Convert whole site irrigation system to recycled water to offset domestic water consumption (where available). |
| Buy Local! Source Produce and Other Food Locally | • Source 100% of fresh produce using the following three-tiered definition: San Diego Local (within 25 miles of the San Diego County line), Regional (250-mile radius from San Diego) and California Grown (within the state of California). Farmers may not yet have the infrastructure but will undoubtedly invest in this given the demand and increased needs.<br>• Continue to advocate at the state and federal level to support the U.S. Department of Agriculture's (USDA's) current efforts to increase infrastructure to achieve local sourcing for meats through the USDA commodity program.<br>• Use organic foods whenever possible.<br>• Adhere to the Buy America provision of the Richard B. Russell National School Lunch Act, which directs School Food Authorities to buy domestic products with federal funds, and dramatically increase the purchase of California foods grown and processed in state.<br>• Work with local farmers to provide food waste to them for animal feed.<br>• Consider working with the San Diego County of Education (SDCOE) to increase buying power and reduce costs.<br>• Continue to work with local companies to develop healthy food items. |
| Adopt Net Zero Waste and Generate Income | • Partner with the City, the County, SDCOE, and local universities to achieve the volume needed to create an economically sound pathway to zero waste and fuel generation. Explore fuel generation to generate income.<br>• Incorporate waste diversion goals, metrics, and fuel generation goals through a larger Climate Action Plan.<br>• Develop a dashboard to track waste costs and cubic feet generated per school/per student, as well as a per school diversion rate. This would be used as a baseline to measure effectiveness of education and outreach and implementation of additional diversion programs.<br>• Adopt a policy that requires construction/building/remodeling projects to recycle 75% of construction and demolition waste.<br>• Partner with the City of San Diego to participate in their Resource Recovery Center and "one-stop-shop" when developed at Miramar Landfill to reduce cost and maximize waste diversion.<br>• Explore new models for state, local, and federal funding of materials management programs and other grant sources to support Net Zero Waste and fuel generation.<br>• Make the expanded recycling processes piloted with the CalRecycle Grant permanent.<br>• Identify options to reduce food services packaging such as use of utensil, straw, and napkin dispensers. |

| Measure | Recommendation |
|---|---|
| Establish or Join Large Purchasing Cooperatives | • Join or create larger purchasing consortiums. Also, review participation in all current purchasing cooperatives to determine whether or not they save money, and increase efficiency and productivity.<br>• Provide small businesses the opportunity to supply District needs. Purchases in amounts less than the bid threshold may be purchased from small businesses without a competitive bid. The bid threshold is established annually by the State Superintendent of Public Instruction in accordance with the California Public Contract Code. |
| Rescue 100% of Unused Packaged Foods and Uneaten Whole Fruits | • Decrease Waste: Students tend to rush through their meal service and not consume all that they take due to either short lunch periods, or too many students released for one lunch period. Recommend multiple lunch periods for middle school and high schools. Elementary schools schedule playtime prior to the lunch period.<br>• Rescue Whole Fruit with Peels: Instead of students throwing away their whole fruits in trash cans, provide boxes where whole fruit can be placed. School reports found that the fruit is typically eaten by the time school ends.<br>• The Healthy Students, Healthy Families, and Healthy Communities resolution allows the District to donate excess food that meets federal regulations to needy families and children. The donations are limited to packaged food items that have not been served to students as a part of the District's school meals program.<br>• Expand the District's pilot food rescue program to a daily program at all prep kitchens with Feeding America and other non-profits. Continue the program through the various school break feeding program (i.e., Summer Fun Café, etc.). |
| Support School Gardens to Grow Produce for Food Services | • Explore cost benefit analysis, partnerships, and other methods to develop infrastructure to produce all of the District's produce needs in-house via hydroponics and/or aquaponics. Long-term savings could be significant, create more local jobs and potentially generate revenue. Great opportunity for student critical thinking, field trips, collaborations, and job training.<br>• Hire a District Garden Coordinator to help establish and support school gardens, provide trainings to site garden, form collaborations, oversee hydroponics program, and provide resources.<br>• Also, in order for school gardens to be able to plant, harvest, and serve fruit from their school fruit trees, the District needs to consider revising the School Site Guide for Gardens and Landscape. Currently the Guide states fruit trees are not allowed. This is extremely unfortunate as children enjoy fruit that they have helped to grow, and fruit trees are the easiest to harvest and serve on the salad bar. |
| Embed Sustainability Education into the Fabric of Teaching and Learning | • Consider embracing California's Education and the Environment Initiative (EEI) to teach to mastery select K-12 California academic content standards in Science and History-Social Science, using the environment as a context for learning. The EEI meets California. Common Core Standards and Next Generation Standards. It has the support of the state, major non-profits, leading environmental groups and scientists. The curriculum is available for free online and does not require printing. Educator training is conducted by the state. |

| Measure | Recommendation |
|---|---|
| Improve Transportation Sustainability | • Park buses at or close to the schools and neighborhoods they are servicing to reduce gas, mileage, drive time, and pollution. Buses can be returned once a week to the main bus facilities for fuel, inspection, and maintenance needs. Reposition drivers to work the routes closest to their homes to cut down on their drive time. Off-hour use of school grounds would provide a safe location for buses and dual use of existing lots.<br>• Establish a plan to replace the aging fleet (average 14.95 years) with rounds of modern vehicles (buses and white fleet). In addition to environmental returns, this will also decrease safety risks. See attached vehicle replacement plan for the white and yellow district fleet.<br>• Buses retired may be disposed of by auction or sale with the approval of the Board to assist with replacement costs.<br>• Develop a program to encourage higher enrollment of students in their own neighborhood schools so transportation needed is reduced. This is coupled to academic excellence of sites.<br>• Seek grant funding to pilot intra-cluster bus routes.<br>• Continue the use of biodiesel while studying the potential integration of alternative fueled vehicles such as compressed natural gas (CNG), electric, hybrid, and other options as the technology develops. |

Source: District 2014.

## District Policies

Board Policies (BPs) adopted by the Board of Education have provided a framework for the District's pathway to conservation and sustainability. BPs have accompanying Administrative Regulations (ARs) that provide further details of the practices of each BP. Summaries of the BPs and ARs are provided in Table 4.7-5. The full language of BPs and ARs can be found on the District's website under *Policies and Procedures* (District 2017a).

**Table 4.7-5. District Board Policies and Administrative Regulations**

| Board Policy |
|---|
| **BP 3510 Green School Operations-Sustainability:** This policy would require the Superintendent or their designee to promote green school practices. Strategies would be developed with input from site administrators and maintenance staff, local government and utility agencies, and community organizations. |
| **BP 3511 Energy and Water Management**: This policy would require the Superintendent or their designee the ability to develop a resource management program to implement effective and sustainable resource practices, explore renewable and clean energy technologies, reduce energy and water consumption, minimize utility costs, reduce the amount of waste from consumable materials, encourage recycling and green procurement practices, and promote conservation principles. |
| **BP 3511.1 Integrated Waste Management:** This policy gives the Superintendent or their designee the ability to develop a cost-effective integrated waste management program. The program would include strategies to reduce solid and hazardous waste generation and disposal, improve efficiency in its use of natural resources, and minimize the impact of such use on the environment. |

**BP 3514 Environmental Safety:** The policy requires the Superintendent or their designee to regularly assess and identify environmental health risk and develop a plan to prevent and/or mitigate hazards. Strategies may include ensuring good indoor air quality with adequate ventilation and proper maintenance, limiting outdoor activities during poor air quality conditions, and reducing exposure to diesel exhaust by limiting unnecessary idling of school buses and other commercial motor vehicles.

**Administrative Regulation**

**AR 3511:** The following district operations shall be incorporated into the district's resource management program.

1. Educational Programs
2. Classroom and Building Management and Maintenance
   a. This includes air conditioning equipment, computer network equipment, school kitchens, heating equipment, lighting, and water.
3. Food Services and Equipment Maintenance
4. Landscaping
5. Transportation Services
6. Administrative Operations
7. Use of Facilities by Outside Groups

**AR 3511.1:** The program shall implement measures and/or practices to:

1. Reduce the consumption of disposable materials, increase the diversion of organic and recyclable materials, and fully utilize all materials prior to disposal.
2. Recycle materials such as paper, glass, plastic, and metal.
3. Any school or district facility that generates more than four cubic yards of organic waste per week shall arrange for organic waste recycling services.
4. Prefer recycled and other environmentally preferable products when procuring materials for use in district schools and buildings or contracting for the construction or modernization of any district building.
5. Work with city, county, or other government or non-government agencies to locate markets for the district's reusable, recyclable, compostable, or other recoverable materials.
6. Minimize the use of nonbiodegradable materials and work with vendors and contractors to use packaging and delivery materials that generate less waste.

**AR 3514:** One or more employees shall be trained to coordinate the District's environmental safety programs to prevent and mitigate environmental health risks, ensure effective implementation of environmental safety strategies, and report to the Superintendent regarding the District's progress in addressing environmental safety concerns. Topics of environmental concern include:

1. Indoor Air Quality
2. Outdoor Air Quality
3. Vehicle Emissions
4. Drinking Water
5. Lead Exposure
6. Mercury Exposure
7. Asbestos Management

Source: District 2017a.

See: https://sandiegounified.org/about/policies_procedures.

The District has also adopted the Collaborative for High Performance Schools (CHPS) criteria to be used in designing, building, renovating, and operating schools (District 2003). CHPS criteria include implementing principles that foster well-designed, operated, and maintained educational facilities; conserving energy, water, and other natural resources; and reducing waste, pollution, and environmental degradation. CHPS criteria have been incorporated into the District's *Architect's*

*Professional Services Manual,* which requires designers to be consistent with the District's design guide (District 2019).

## GHG Reduction Plan

The District developed a comprehensive plan for reducing GHG emissions in its Climate Mitigation and Adaptation Goals (District 2017b). The plan included strategies that aligned with the District's policies stated above, focused on the following:

1. Reduction of Energy Use in Buildings
    a. Efficient Buildings and Mechanical Systems
    b. Light-Emitting Diode (LED) lighting
2. Solar Energy Generation
3. Community Choice Aggregation Program
4. Student Transportation
5. Employee Transportation
6. Solid Waste Diversion
7. Water Efficient Fixtures

Based on the District's Greenhouse Gas Inventory for 2015, transportation and electricity contributed more than 90% of the District's GHG emissions. Transportation included employee travel (26%), student travel (parent drop-off) (23%), and district vehicle fleet (13%); purchased electricity contributed 30% (District 2017b). Many of the reduction strategies focused on renewable and energy efficiency sources because the District can oversee implementation of specific actions, whereas modes of transportation are more difficult to enforce. Much progress has been made toward reaching GHG reduction goals and complying with state and local goals; notable accomplishments are described below.

### Zero Net Energy Plan

As discussed above, California has set a goal of 50% of commercial buildings to be retrofitted to ZNE by 2030. A ZNE building is defined as an energy-efficient building where, on a source energy basis, the actual annual consumed energy is less than or equal to the onsite renewable generated energy. The District proposed the 10-year ZNE Plan to comply with the state mandate and the District's energy efficiency goals (Garcia-Craivanu pers. comm. (d)). Implementation of the ZNE plan would focus on the following:

- School sites that consume 50% of the District's energy,
- Schools that have an energy use intensity greater than or equal to 25,
- School sites that have, or are planned for solar photovoltaics (PV), and have not had upgrades from Proposition 39,
- Buildings that are planned for whole modernizations that can accommodate solar PV,
- Assessing school sites that may be potential sites for future battery storage projects.

- Building upon behavioral conservation where staff and students can develop energy and resource conservation habits.

## District Progress

The District has implemented many programs and projects to reduce GHG emissions and comply with state and local goals, notable accomplishments are described below.

### Proposition 39

State Proposition 39 K-12 program, also known as the Clean Energy Jobs Act, provided grant funds for energy projects, such as energy efficiency upgrades and clean energy generation (CEC 2017). In 2015, the District was awarded $25 million for energy saving projects. The District has completed 107 energy efficient projects at 77 sites (Garcia-Craivanu pers. comm. (d)). These projects consisted of PV Solar, interior/exterior LED lighting, and HVAC efficiency projects.

These projects also included Energy Management Systems (EMS) which allow the District to centrally control HVAC systems. This control is accomplished by remote scheduling and setting setpoint temperatures to the District Board policies and regulations. This saves energy by ensuring all systems are shut down during summer breaks and holidays to avoid operating systems while unoccupied. The estimated electricity energy savings is approximately 7% per site per year. The District has 131 sites on EMS and has 65 sites to convert to EMS (Garcia-Craivanu pers. comm. (d)). Some of the existing sites with EMS may not have EMS for all rooms; however, the District will continue upgrading sites to have 100% EMS capabilities.

Overall, these projects contribute to the District's *Dream Big* initiatives and the GHG reduction plan.

### Clean Mobility in Schools Pilot Project

The District was one of three school districts awarded funds to promote zero-emission transportation options for students. The District was awarded $9.75 million in 2020 to purchase 13 electric-powered school buses, other various electric vehicles, with infrastructure and charging stations, and battery-powered landscape equipment. The District would use these funds to construct a battery storage system at Lincoln High School, with construction expected to begin in 2021 (Garcia-Craivanu pers. comm. (d)).

### AB 827

AB 827 would require the District to participate in mandatory commercial recycling and mandatory organics recycling (such as kitchen waste from school meal programs). The District has allocated resources for full-time employees to manage waste diversion and report on the District's results. In 2019, the District recycled 15 million pounds of material, thus diverting waste from landfills (Garcia-Craivanu pers. comm. (d)).

### AB 841

Adopted in late 2020, the District started the process with the CEC to provide feedback for the new grant program. The District intends to apply for the grant funds that focus on sites in disadvantaged communities to upgrade existing ventilation systems and controls to improve air quality in response to the COVID-19 pandemic. These upgraded systems would be more energy-efficient compared to the existing systems.

The District has prepared several documents to guide its sustainability goals. The District's *Solar PV Design Guide* outlines the District's objective to install solar photovoltaic (PV) systems at school campuses throughout the District to generate electricity. The District aims to produce enough solar electrical energy to offset site electrical consumption, thereby reducing electrical energy costs, reducing the District's environmental impact, and providing a hedge against future utility rate inflation and shifts. The District's current goal is to produce enough solar energy onsite to offset 90% of site-wide consumption. The *Solar PV Design Guide* provides direction on future solar projects (District 2017c). In addition, the District's *Standards for New Construction, Additions, and Remodels* includes guidelines for site improvements and landscaping. These standards include design features that would assist the school in reducing its energy consumption, waste production, and water consumption. These design features include implementing xeriscaping practices and plantings consistent with local climate conditions to reduce plant waste and energy costs (District 2016). The District's *Educational Specifications* also reinforces the District's goals for sustainability as it relates to renewable energy and recycled materials.

Further, the District has adopted the use of the Collaborative for High Performance Schools (CHPS) criteria to be used in designing, building, renovating, and operating schools in the District (District 2003). This includes implementing principles that foster well-designed, operated, and maintained educational facilities; conserving energy, water, and other natural resources; and reducing waste, pollution, and environmental degradation. CHPS criteria has been incorporated into the District's *Architect's Professional Services Manual,* which requires designers to be consistent with the District's design guide (District 2019a).

## San Diego Association of Governments

The San Diego Association of Governments (SANDAG) is the Metropolitan Planning Organization for San Diego County and 18 cities within the county, including the city of San Diego. The first per-capita GHG emissions reduction targets for the San Diego Air Basin (SDAB) were 7% by 2020 and 13% by 2035 from 2005 levels. SANDAG adopted a Sustainable Communities Strategy (SCS) as part of their regional transportation plan (RTP) for the air basin in 2015. The plan exceeds the regional per-capita targets, achieving 15 and 21% reduction in per capita GHG emissions by 2020 and 2035, respectively (San Diego Association of Governments 2015). As required by SB 375, CARB updated the per-capital GHG emissions reduction targets in 2018. The new targets will be addressed in SANDAG's forthcoming RTPs and are a 15% per capita GHG reduction by 2020 and 19% per capita reduction by 2035 from 2005 levels (CARB 2019c).

## San Diego Air Pollution Control District

As discussed in Section 4.2, *Air Quality and Health Risk*, the San Diego Air Pollution Control District (SDAPCD) is responsible for air quality planning within the San Diego County Air Basin, including projects in the city of San Diego. SDAPCD has not developed specific thresholds to evaluate GHG impacts, but has developed GHG-related regulations to implement federal rules and continues to participate in regional efforts aimed at addressing GHG emissions. For instance, SDAPCD administers Rules 1401 and 20.3, which address GHG emissions from stationary sources. SDAPCD has a memorandum of understanding with CARB to maintain coordination between the two agencies to address municipal solid waste landfills and related emissions. SDACPD also participates in regional GHG initiatives, including the City's Center for Civic Engagement's Climate Initiative Vision Action Team, SANDAG's SCS development process, and local climate action planning (SDAPCD 2019).

## City of San Diego Climate Action Plan

The City of San Diego adopted a CAP in 2015. The CAP outlines the City's efforts to reduce GHG emissions consistent with statewide GHG reduction goals. The goals of the CAP include creating a renewable energy program, implementing a zero-waste plan, improving public health and air quality, conserving water, using existing resources efficiently, increasing clean energy production, improving quality of life, and saving taxpayer money. The CAP is a package of strategies to reduce GHG emissions by 15, 40, and 50% by 2020, 2025, and 2035, respectively, relative to 2010 baseline conditions (City of San Diego 2015a).

## City of San Diego General Plan

The City of San Diego's General Plan addresses issues related to climate change in its Conservation Element, Mobility Element, Land Use and Community Planning Element, and Urban Design Element. The issues addressed include GHG emissions and alternative modes of transportation, energy efficiency, local food, urban heat island effect, waste management and recycling, and waste management and supply. Examples of polices related to GHG emissions and alternative modes of transportation are provided below. This is not an exhaustive list; additional details and policies can be found in each element.

### Conservation Element

- **CE-A.1:** Influence state and federal efforts to reduce GHG emissions so that implementation requirements are equitably applied throughout the state, and to address actions that are beyond the jurisdiction of local government.
- **CE-A.2:** Reduce the City's carbon footprint.
- **CE-A.5:** Employ sustainable or "green building" techniques for the construction and operation of buildings.
- **CE-A.13:** Regularly monitor, update and implement the City's CAP to ensure, at a minimum compliance with all federal, state, and local laws.

### Mobility Element

- **ME-A.2.b:** Promote "Walking School Bus" efforts where parents or other responsible adults share the responsibility of escorting children to and from school by foot or bicycle.
- **ME-A.2.c:** When new schools are planned, work with school districts and affected communities to locate schools so that the number of students who can walk to school safely is maximized.
- **ME-A.9:** Continue to collaborate with regional agencies, school districts, community planning groups, community activists, public health professionals, developers, law and code enforcement officials, and others, to better realize the mobility, environmental, social, and health benefits of walkable communities.

### Urban Design

- **UD-A.10:** Design or retrofit streets to improve walkability, bicycling, and transit integration; to strengthen connectivity; and to enhance community identity.

### Land Use and Community Planning

- **LU-I.11:** Implement the City of Villages concept for mixed-use, transit-oriented development as a way to minimize the need to drive by increasing opportunities for individuals to live near

where they work, offering a convenient mix of local goods and services, and providing access to high quality transit services.

# 4.7.4 Impact Analysis

This section describes the impact analysis related to GHG emissions for the Proposed Program. It describes the methods used to quantify GHG emissions and discusses the thresholds used to evaluate whether an impact would be significant. Measures to mitigate (i.e., avoid, minimize, rectify, reduce, eliminate, or compensate for) significant impacts accompany each impact discussion, when necessary.

## 4.7.4.1 Methodology

The Proposed Program includes the construction of new schools as well as various repair, renovation, and revitalization improvements at existing facilities that would result in construction and operational changes relative to the existing setting. GHG impacts associated with construction and operation of the Proposed Program were assessed using standard and accepted software tools, techniques, and emission factors. A summary of the methodology is provided below. A full list of assumptions can be found in Appendix D.

### Construction Emissions

Projects that could be implemented under the Proposed Program would generate construction-related emissions from mobile and stationary construction equipment exhaust, employee and haul truck vehicle exhaust, land clearing and material movement, paving, and architectural coatings application.

For purposes of analysis, it is assumed that buildout of the Proposed Program would be 2030. With an anticipated buildout year of 2030, implementation of various projects associated with the Proposed Program would occur over an extended period and would depend on factors such as economic conditions, market and student demands, and other financial and District considerations. Without specific project-level details for all projects, it is not possible to develop an accurate and comprehensive construction inventory for buildout of the Proposed Program.[2] Consequently, the determination of construction GHG impacts for each individual development project, or a combination of these projects, would require the District to speculate regarding such potential future project-level environmental impacts. Thus, in the absence of the necessary construction information required to provide an informative and meaningful analysis, the evaluation of potential construction-related impacts resulting from implementation of the Proposed Program is conducted *qualitatively* for all project categories, except for joint-use facilities for which more specific assumptions from the District were available.

While specific joint-use facility projects have not been defined, a *quantitative* analysis was able to be conducted based on the location of future joint-use facilities and assumptions related to the type of construction equipment, durations, etc., used for recently completed joint-use facilities in the District. Total construction emissions associated with future joint-use facilities were modeled using

[2] Project-level information includes details such as the size and scale of the project to be constructed, construction schedule, equipment fleet, construction worker crew estimates, and demolition and grading quantities.

CalEEMod (version 2016.3.2) and data provided by the District (e.g., total number and acreage of joint-use facilities) to scale other inputs (e.g., off-road equipment, hauling trips) based on assumptions from other recent District joint-use facility analyses (Garcia-Craivanu pers. comm. (a)).

## Operational Emissions

District operations include a variety of emission sources that vary by the size of the campus and the types of activities that occur at specific sites. Projects that could be implemented under the Proposed Program would generate operations-related GHG emissions from mobile, area (including off-road), energy, water, and waste sources. Mobile sources are vehicle trips associated with student drop-off/pickup, including school buses, as well as employee travel. Area sources include general landscaping activities, consumer products (e.g., personal care products), and periodic paint emissions from facility upkeep. Energy sources include natural gas combustion for space and water heating requirements. Off-road sources include landscaping equipment used to maintain the joint-use facilities. Water and waste consumption would also result in GHG emissions. Operational emissions were quantified for existing (2019) and buildout (2030) conditions, where applicable.

### Mobile Source Emissions

GHG impacts from motor vehicles operating within the Program area were evaluated using CARB's EMFAC2017 model and daily VMT and trip data for existing (2019) and buildout (2030) year conditions, which was provided by the traffic engineers (Chen Ryan & Associates 2019, Prescott pers. comm.). Daily VMT and trips were converted to annual VMT and annual trips assuming 180 school days per year. The traffic data only includes VMT and trips generated by academic (elementary, middle, and high school) facilities within the Program area by students and teachers. VMT and trips generated by supporting non-school uses, such as independent administrative facilities, are not included in the transportation assessment. Additionally, the 2030 buildout VMT and trips for the Proposed Program include VMT and trips at existing academic facilities and VMT from District projects that would increase student enrollment at existing academic facilities up to the current planned capacity. Specific project-level details for new schools, projects that increase capacity at existing schools, and non-school uses that may be developed under the Program are not currently known. As such, the mobile source analysis does not account for VMT and trips resulting from potential capacity-increasing projects, and emissions are therefore discussed qualitatively for this programmatic analysis.

Using the data described above, GHG emissions from motor vehicle travel associated with academic uses were calculated by multiplying the VMT estimates from Chen Ryan by the appropriate emission factors (e.g., grams per mile for running emissions, brake wear, tire wear) provided by EMFAC2017. These emissions were added to process emissions (i.e., emission from vehicle starts, running losses, etc.), which were calculated by multiplying the daily trips by the appropriate emission factors (e.g., grams per trip for process emissions) provided by EMFAC2017. Please refer to Appendix D for the EMFAC2017 emission factors and traffic data utilized in this analysis.

In addition to enrollment increases, GHG emissions from motor vehicle travel associated with joint-use facilities were estimated using data provided or confirmed by the District (e.g., total number and acreage). Vehicle trips associated with new joint-use facilities are based on the City of San Diego's *Trip Generation Manual* (2003), consistent with recently completed joint-use facilities in the District. Please refer to Appendix D for the CalEEMod output files.

### Area, Energy, Water, and Waste Source Emissions

Area source emissions would be generated by landscaping maintenance equipment, architectural coatings, and consumer product use. Energy sources include the combustion of natural gas for building heating and hot water. Water consumption results in indirect GHG emissions from the conveyance and treatment of water. Waste generation results in fugitive $CH_4$ and $N_2O$ emissions from the decomposition of organic matter. The 2030 modeling reflects implementation of state measures to reduce GHG emissions (e.g., SB 100).

Area, energy, water, and waste emissions generated by academic facilities under the Proposed Program were estimated in CalEEMod using existing (2019) and buildout year (2030) student enrollment and capacity data provided by the traffic engineers (Chen Ryan & Associates 2019). Annual electricity. natural gas, and water consumption data was provided by the District (Garcia-Craivanu pers. comm. (b)). Consumption rates were determined for each school type using the number of existing and future students provided by the traffic engineers and the highest energy, natural gas, water consumption rate amongst the school types were conservatively used in the analysis for modeling. Where Program-specific information was unavailable, model defaults (e.g., architectural coating, solid waste generation, landscaping maintenance equipment) were used.

Like the mobile source analysis, operational area, energy, water, and waste emissions were only quantified for project categories that included projects that would increase student enrollment at existing academic facilities to current permitted capacity. The analysis does not include emissions resulting from non-school uses (e.g., administrative buildings) or capacity-increasing projects (e.g., new schools). The specific number and scope of these potential projects is currently unknown, and as such, a quantitative emissions analysis of non-school uses and capacity-increasing school projects would be speculative for this programmatic analysis. Therefore, emissions related to the New Acquisition and New School or Administrative Facilities project category are discussed qualitatively.

Area, water, and waste emissions generated by joint-use facilities under the Proposed Program were estimated in CalEEMod using existing (2019) and buildout year (2030) joint-use facility data (e.g., total number and acreage of existing and future joint-use facilities, landscaping equipment used) from previous projects by the District (Garcia-Craivanu pers. comm. (a)). Landscaping equipment provided by the District was modeled separately as off-road sources and resulting emissions were added to area source emissions. Where project-specific information was unavailable, model defaults (e.g., water consumption and solid waste generation) were used. Joint-use field parking lots would require lighting. Per the district, 20% of total joint-use field acreage is representative of parking lot acreage that would consume electricity (Garcia-Craivanu pers. comm. (c)). Please refer to Appendix D for the CalEEMod output files.

## Screening Criteria for Future Projects

This PEIR does not include project-level screening criteria for construction and operational GHG emissions. Unlike criteria pollutants, there are no adopted state or local construction or operational GHG thresholds. A District-specific threshold capable of supporting project-level screening criteria cannot be developed without specific construction and operational details for all project categories, including construction of non-academic facilities, which are currently unknown.

# 4.7.4.2 Thresholds of Significance

## State CEQA Guidelines

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining significance of impacts associated with GHG emissions and climate change resulting from the implementation of the Proposed Program. The determination of whether a GHG emissions impact would be significant is based on the thresholds described below and the professional judgment of the District as Lead Agency and the recommendations of qualified personnel at ICF, all of which is based on the evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following.

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The State CEQA Guidelines do not indicate what amount of GHG emissions would constitute a significant impact on the environment. Instead, they authorize the lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence (State CEQA Guidelines Sections 15064.4(a) and 15064.7(c)). A summary of the CEQA guidance regarding the analysis of GHG emissions is provided below.

### Section 15064.4 (a)

This section indicates that CEQA requires a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project; compare estimated emissions to a threshold the lead agency deems appropriate (with evidence to support this threshold); and assess the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. This guideline gives the lead agency discretion in quantifying GHG emissions resulting from a project and/or relying on a qualitative analysis or performance-based standards.

This section does not indicate what amount of GHG emissions would constitute a significant impact on the environment. Instead, CEQA authorizes the lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.

### Section 15064.4 (b)

Section 15064.4 (b) requires a lead agency to consider the following factors:

- The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project GHG emissions exceed a threshold of significance that the lead agency determines applies to the project.

- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The lead agency must include substantial evidence linking findings statewide goals, strategies, and plans to the project's findings (added in response to *Center for Biological Diversity et al. vs. California Department of Fish and Wildlife, the Newhall Land and Farming Company*; see below).

### Section 15064.4 (c)

This section states that a lead agency may choose a model or methodology to estimate GHG emissions that it considers most appropriate. The lead agency must support its selection of a model or methodology with substantial evidence and explain the limitations of the model or methodology.

### Section 15183.5

Section 15183.5 outlines requirements that lead agencies can take to analyze and mitigate the significant effects of GHG emissions at a programmatic level, such as in a general plan, long-range development plan, or in a separate plan (such as a CAP) to reduce GHG emissions, so that later project-specific environmental documents may tier from the prior analysis to determine significance.

## Summary of Recent Court Decisions

The Courts have ruled on various matters related to GHG analyses in CEQA documents, which has helped define acceptable practices for adequate analysis of GHG emissions under CEQA, including setting thresholds, properly defining levels of significance, and identifying mitigation measures. The Courts' decisions highlight that there are multiple ways to evaluate GHG emissions impacts in CEQA documents, depending on the circumstances of a given project. CEQA gives the lead agency discretion to quantify GHG emissions resulting from a project and/or rely on a qualitative analysis or performance-based standards, but the lead agency must support its decisions with substantial evidence and explain any limitations associated with the analysis. In addition, a lead agency's analysis should consider a timeframe that is appropriate for the project and must reasonably reflect evolving scientific knowledge and the current state regulatory schemes.

In the 2015 California Supreme Court decision in the *Center for Biological Diversity et al. vs. California Department of Fish and Wildlife, the Newhall Land and Farming Company* (November 30, 2015, Case No. S217763) (hereafter Newhall Ranch) the Court identified several potential approaches that may be appropriate alternatives for determining significance of project-level GHG emissions. The decision affirmed that "thresholds only define the level at which an environmental effect 'normally' is considered significant; they do not relieve the lead agency of its duty to determine the significance of an impact independently." In the 2018 Court of Appeals decision in *Golden Door Properties/Sierra Club vs. County of San Diego* (September 28, 2018, 27 Cal.App.5th 892) (hereafter Golden Door), the court reinforced the message from the Newhall Ranch decision that analyses need to provide substantial evidence to support significance thresholds selected for use in the CEQA analysis. Both the Newhall Ranch and Golden Door cases demonstrate that while there are various potential thresholds and methodologies for evaluating project- or plan-level GHG emissions consistent with CEQA, use of statewide emission reduction goals is a "permissible criterion of significance" so long as substantial evidence and reasoned explanation is provided to close the analytical gap between the level of effort required at one scale (state level) to the level of effort required at another scale (e.g., proposed plan level). Other recent cases have reinforced the

discretion of lead agencies to select thresholds provided that stay in line with the state of the science.

The following are some of the Court's suggested approaches for analyzing GHG impacts under CEQA.

- **Consistency with a Qualified GHG Emissions Reduction Plan.** Use of a GHG emission reduction plan is consistent with State CEQA Guidelines Sections 15183.5 or 15064.4 for a geographic area.
- **Performance Based.** Performance based thresholds relate the required level of reduction at the project level to the statewide burden required to meet California's GHG goals.
- **Quantitative Thresholds.** A quantitative threshold (such as the Bay Area Air Quality Management District's bright-line threshold) identifies the level above which a project may contribute a significant amount of GHG emissions.
- **Compliance with Regulatory Programs**. This approach would include an assessment of the project's compliance with regulatory programs designed to reduce GHGs from emissions-generating activities (e.g., energy consumption, transportation, water usage). To the extent that a project's design features comply with or exceed the regulations outlined in the 2017 Scoping Plan and adopted by CARB or other state agencies, the lead agency could appropriately rely on their use as showing that the project is reducing emissions consistent with state reduction targets and, thus, that emissions are less than significant.

Under any methodology, if GHG emission impacts are still significant after adoption of all feasible mitigation measures and consideration of project alternatives, the lead agency may adopt a statement of overriding considerations with the appropriate findings.

## Applicability of Available Thresholds

The following sections discuss the threshold approaches recommended by the Courts and supported by CEQA and analyzes their applicability to the operational emissions analysis for the Proposed Program.

### Compliance with a Qualified GHG Reduction Strategy

OPR acknowledges that the state legislature encourages lead agencies to tier or streamline their environmental documents whenever feasible, and that GHG emissions may be best analyzed and mitigated at the programmatic level (OPR 2018). A qualified plan may be used in the cumulative impact analysis for later projects when the analysis "identifies those requirements specified in the plan that apply to the project." For a GHG reduction plan to be considered a qualified plan, it must meet certain criteria established under State CEQA Guidelines Sections 15183.5 (b) and 15064.4, also specified above. Consequently, if a project is consistent with a local CAP that was created to meet that area's fair share reductions towards the AB 32 GHG target for 2020, then the project would be considered consistent with statewide GHG reduction goals for 2020. Additionally, if a CAP was adopted that was consistent with the state's overall goals for post-2020, including the downward trajectory as clarified in SB 32 and EO S-03-05, and a project is consistent with that CAP, it would be considered consistent with the state's post-2020 GHG emission strategy. Section 15183.5 also specifies that the project's CEQA analysis "must identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project."

As discussed under the *Local* subsection of Section 4.7.3, *Applicable Laws and Regulations*, the City of San Diego adopted a CAP in 2015. Though it includes strategies to reduce GHG emissions in the various sectors, the GHG inventory does not explicitly reference District schools and facilities. Therefore, likely, it cannot be assumed the CAP took into consideration the Proposed Program, and the CAP is not an appropriate threshold approach for the Proposed Program's analysis.

## Performance-Based Thresholds

Performance-based thresholds are based on a percentage reduction from a projected future condition; for example, reducing future Business As Usual (BAU) emissions by the AB 32 target of 40% (below 1990 BAU levels) through a combination of state measures, project design features (e.g., renewable energy), or mitigation. Some air districts have recommended performance-based thresholds that are tied to the AB 32 target of achieving 1990 levels by 2020, but the prescribed percentage reduction varies depending on the version of the Scoping Plan that was used as the basis for threshold development. For example, San Joaquin Valley Air Pollution Control District recommends a 29% reduction, which is based on the 2008 Scoping Plan, while Sacramento Metropolitan Air Quality Management District previously recommended a 21.7% reduction from a projected no action taken (NAT) scenario.[3] The NAT was based on the 2011 re-adopted Scoping Plan, which included revised statewide emissions inventories that accounted for updated estimates of future fuel and energy demands.

Based on the Court's reasoning in the Newhall Ranch decision, relating a given project to the achievement of state reduction targets may require adjustments to CARB's statewide BAU model to not only isolate new development emissions, but also to consider unique geographic conditions and operational characteristics that may affect the performance of reduction measures in certain locations. To date, this type of adjustment to the statewide BAU target has not been performed and, therefore, is not appropriate for the Proposed Program's analysis. The primary value of a performance-based target, as indicated in the Newhall Ranch decision, is that it can provide a scenario by which to evaluate the effectiveness of a project's reduction efficiency relative to an unmitigated condition. As such, future year targets can be used to benchmark performance, using either statewide or regional emission targets, to determine a project's fair share of mitigation. Accordingly, use of a BAU threshold is not appropriate to evaluate GHG impacts from the Proposed Program.

## Quantitative Thresholds

### Numerical Bright-Line

Numerical bright-line thresholds identify the point at which additional analysis and mitigation of project-related GHG emission impacts is necessary. Currently, bright-line thresholds have been developed for commercial projects, residential projects, and stationary source projects. Commercial and residential bright-line thresholds are typically based on a market capture rate or a gap analysis,[4]

[3] The NAT scenario does not include any state regulations designed to reduce GHG emissions, including improvements to the Title 24 standards, RPS, LCFS, or Pavley Rules.

[4] The gap analysis demonstrates the reductions needed at the residential and commercial land use levels to achieve state targets. Capture is the process of estimating the portion of projects that would result in emissions that exceed a significance threshold and would be subject to mitigation.

which is tied back to AB 32 reduction targets (1990 levels by 2020).[5] These bright-line thresholds reflect local or regional land use conditions, particularly residential and commercial density and access to transit. Newhall Ranch reaffirmed the use of numeric bright-line thresholds but noted that their use does not relieve the lead agency of its duty to determine the significance of an impact independently.

A numerical bright-line value based solely on District emissions sources does not exist. Some previous environmental analyses have compared emissions to a 900 $MTCO_2e$ threshold, which was originally proposed by the California Air Pollution Control Officers Association (CAPCOA) in 2008. This threshold was recommended to capture 90% or more of likely future discrete projects across the state. Because this threshold is based on data from several jurisdictions throughout the state, not including San Diego, it does not fully meet recent court guidance[6] with respect to tailoring GHG thresholds to local conditions, project type, and new development. CAPCOA (2008) also recognized that if projects are to rely on a numeric threshold, such as 900 MT, that additional analysis be conducted to ensure the threshold is representative of local market capture goals and project-specific conditions. Various air districts across the state, such as the Bay Area Air Quality Management District and South Coast Air Quality Management District, have recommended bright-line thresholds in the past, including 1,100 and 10,000 $MTCO_2e$, respectively, for a variety of project types, but they are based on local conditions (Bay Area Air Quality Management District 2017, South Coast Air Quality Management District 2008). Consequently, there is no available bright-line threshold that is appropriate to evaluate GHG impacts from the Proposed Program.

**Efficiency-Based**

Another type of quantitative threshold is an efficiency-based threshold. Efficiency-based thresholds represent the GHG efficiency needed for development to achieve California's GHG emissions targets. While the Newhall Ranch decision did not specifically recommend the efficiency-based approach, the ruling did note that numerical threshold approaches may be appropriate for determining significance of GHG emissions and to emphasize the consideration of GHG efficiency. Efficiency-based thresholds allow lead agencies to compare projects of various types, sizes, and locations equally, and determine whether a project is consistent with the state's reduction goals. Efficiency-based thresholds for a residential project can be expressed on a per-capita basis, for an office project on a per-employee basis, or for a mixed-use project on a per service population (the sum of jobs and residents) basis.

Several air districts throughout the state have developed GHG efficiency thresholds for residential, commercial, and mixed-use projects with GHG emissions resulting from a mixture of building energy, transportation, solid waste, and other emissions. These threshold values are all based on the required efficiency emissions that these sources must achieve per service population (i.e., per the sum of jobs and residents) to meet state reduction targets. SDAPCD does not have recommended efficiency thresholds based on regional emissions, population, and employment data.

CARB (2017b) recommends a statewide efficiency target of no more than 6 $MTCO_2e$ per capita by 2030. This target was derived based on total statewide emissions from all emission categories (including emissions from stationary and industrial sources) and the reductions needed to achieve

[5] The AB 32 Scoping Plan identifies specific measures to reduce GHG emissions to 1990 levels by 2020.

[6] See *Center for Biological Diversity et al. vs. California Department of Fish and Wildlife, the Newhall Land and Farming Company* and *Golden Door Properties/Sierra Club vs. County of San Diego*

California's 2030 statewide target under SB 32. CARB's per capita efficiency metric is a useful benchmark to assess the project's consistency with the emissions levels defined by California as needed to achieve the state's fair share reduction contribution to limit global warming to below 2°C (Paris Agreement).

Because CARB's per capita efficiency target is based on statewide emissions, it represents an average efficiency that does not specifically consider the unique geographic and project-specific features that could influence emissions reductions achieved by the Proposed Program, or respond to case law per *Golden Door*, which used an average per-service population metric.

While no efficiency-based thresholds have been adopted or proposed for schools or educational uses, overall efficiency of school uses, on a per student basis, can be beneficial in discussing how a project would support statewide reduction planning. This approach would include benchmarking GHG emissions by a meaningful unit specific to schools, such as the number of students, against the 2030 statewide reduction target. This type of threshold has been developed for the District and is partially used to evaluate GHG impacts associated with the Proposed Program. Additional details are provided under *Threshold Approach* below.

## Compliance with Regulatory Programs

A lead agency could rely on regulatory compliance to show a less-than-significant GHG impact if the project complies with or exceeds those programs adopted by CARB or other state agencies. However, such analysis is only applicable within the area governed by the regulations. For example, consistency with regulations addressing building efficiency would not suffice to determine that the project would not have significant GHG emissions from transportation.

The Newhall Ranch decision specifically mentions consistency with AB 32 as potential mechanisms for evaluating significance. A lead agency could assess project-level consistency with AB 32 in whole or part by evaluating whether the project complies with applicable policies in the AB 32 Scoping Plan. The AB 32 Scoping Plan does not consider deeper reductions needed to meet the state's 2030 target under SB 32. Accordingly, exclusively relying on consistency with the AB 32 Scoping Plan and related programs to evaluate emissions generated by land use development projects constructed after 2020 would not fully consider a project's potential GHG impacts to the state's long-term reduction trajectory.

More recent guidance on GHG reduction strategies and thresholds for operational emissions has been provided at the state level through the 2017 Scoping Plan, OPR, and CARB. The 2017 Scoping Plan outlines GHG reduction strategies by emission sector (water, transportation, and energy) required to meet the state's 2030 target under SB 32. OPR (2018) guidance specifies that a "land use development project that produces low VMT, achieves applicable building energy efficiency standards, uses no natural gas or other fossil fuels, and includes Energy Star appliances where available, may be able to demonstrate a less-than-significant greenhouse gas impact associated with project operation."

To the extent the Proposed Program complies with or exceed applicable policies outlined in the 2017 Scoping Plan and other regulations adopted by CARB or other state agencies, the Proposed Program could appropriately rely on their use as showing compliance with performance-based standards adopted to fulfill the statewide goal for reducing GHG emissions. The Proposed Program's compliance with regulatory programs adopted by CARB and other state agencies is therefore used to

evaluate the significance of the Proposed Program's GHG emissions. The Proposed Program has a buildout year of 2030, consistent with the 2017 Scoping Plan.

## Threshold Approach

As discussed above, there are multiple potential thresholds and methodologies for evaluating project-level GHG emissions consistent with CEQA, depending on the circumstances of a given project. While efforts at framing GHG significance issues have not yet coalesced into a widely accepted set of numerous significance thresholds across the state and within the region, a range of alternative approaches does exist.

Buildout of the Proposed Program is expected to occur in 2030. Recent expert guidance from the Association of Environmental Professionals (2016) recommends that projects should be evaluated against the next statewide milestone target after the project horizon. SB 32 statutorily establishes the 2030 target (40% below 1990 levels); therefore, 2030 marks the next statutory statewide milestone target to which Program-related emissions are to be compared. Consequently, consistent with expert guidance and recent case law, this analysis presents an analysis of Program emissions for full buildout in 2030 using District-specific efficiency thresholds, where an emissions inventory was possible, and a sector-by-sector evaluation of the Proposed Program.

### District-Specific Efficiency Thresholds

Based on the threshold concepts discussed above, this programmatic analysis evaluates GHG impacts with respect to District-specific efficiency thresholds for new acquisitions and new schools, administrative facilities, academic uses, and joint-use facilities, as well as compliance with regulatory programs.

#### New Acquisitions and New Schools

The efficiency threshold for new acquisitions and new schools was derived from the District's 2020 GHG inventories for a single elementary, middle, and high school, which was quantified as part of this PEIR. The inventory was developed using CalEEMod and anticipated student enrollment provided by the District for each school type, consistent with the methodology outlined in Section 4.7.4.1, *Methodology*. Under AB 32, California must reduce its emissions to 1990 levels (431 million $MTCO_2e$) by 2020. The latest statewide GHG inventory demonstrates that emissions in 2017 were 424 million $MTCO_2e$, which is 7 million $MTCO_2e$ below the 2020 GHG limit of 431 million $MTCO_2e$ (CARB 2019d). Based on the state's GHG limit under AB 32, this analysis assumes GHG emissions generated by District activities in 2020 are equivalent to those emissions generated in 1990. Directly equating 2020 emissions with 1990 levels is likely conservative based on CARB's recent GHG inventory report showing that California's GHG emissions in 2017 are below 1990 levels. Tables 4.7-6 through 4.7-8 present the 1990/2020 inventory for new acquisitions and new schools by school type. Please refer to Appendix D for the emission factors and outputs in this analysis.

As shown in Table 4.7-6, 1990/2020 emissions from a single new acquisition and elementary school are estimated to be 511 $MTCO_2e$, or 1.1 $MTCO_2e$ per student. Because SB 32 requires a 40% reduction in GHG emissions below 1990 levels by 2030, the 1990/2020 emissions from a single District elementary school was reduced by 40% to calculate the District's 2030 GHG emissions target for elementary schools. This was estimated to be 307 $MTCO_2e$, which represents the emissions intensity that the District would need to meet in order to achieve its 2030 reduction target for academic uses, consistent with SB 32. Assuming the same number of enrolled students per

elementary school in 2030, the resulting target is 0.68 $MTCO_2e$ per student. GHG impacts from new elementary school projects would be considered less than significant if they emit 0.68 $MTCO_2e$ or less per student.

**Table 4.7-6. 1990 GHG Emissions Inventory for New Elementary Facilities (metric tons)**

| Emission Source | $CO_2$ | $CH_4$ | $N_20$ | $CO_2e$ | Percentage of Total $CO_2e$ |
|---|---|---|---|---|---|
| **1990/2020** | | | | | |
| Area | <1 | <1 | <1 | <1 | <1 |
| Energy | 70 | <1 | <1 | 70 | 14 |
| Mobile | 387 | <1 | <1 | 388 | 76 |
| Waste | 17 | 1 | <1 | 41 | 8 |
| Water | 10 | 0 | <1 | 11 | 2 |
| Total (1990/2020 Levels)[1] | 484 | 1 | <1 | 511 | 100 |
| 2020 Student Enrollment/School | | | | 450 | |
| **1990 Threshold (MT per student)** | | | | **1.1** | |
| **2030** | | | | | |
| 2030 GHG Emissions Limit (40% below 1990 levels per SB 32) | | | | 307 | |
| 2030 Student Enrollment/School | | | | 450 | |
| **2030 Threshold (MT per student)**[2] | | | | **0.68** | |

Source: CalEEMod and EMFAC. See Appendix D.

[1] Based on the state's GHG limit under AB 32, GHG emissions generated by District in 2020 are assumed to be equivalent to those emissions generated in 1990.

[2] The 2030 threshold was derived by reducing the 1990/2020 inventory by 40% (per SB 32) and dividing by the 2030 student enrollment per school, which is assumed to remain the same as 2020.

District-specific efficiency thresholds were also determined for new junior high and high schools using the same approach as elementary schools and are shown in Tables 4.7-7 and 4.7-8, respectively. Assuming the same number of enrolled students per junior high and high school in 2030, the resulting targets are 0.82 and 0.84 $MTCO_2e$ per student, respectively. GHG impacts from new junior high and high school projects would be considered less than significant if they emit 0.82 and 0.84 $MTCO_2e$ or less per student, respectively. Please refer to Appendix D for modeling outputs in this analysis.

**Table 4.7-7. 1990 GHG Emissions Inventory for New Junior High Schools (metric tons)**

| Emission Source | $CO_2$ | $CH_4$ | $N_20$ | $CO_2e$ | Percentage of Total $CO_2e$ |
|---|---|---|---|---|---|
| **1990/2020** | | | | | |
| Area | <1 | <1 | <1 | <1 | <1 |
| Energy | 116 | <1 | <1 | 116 | 11 |
| Mobile | 826 | <1 | <1 | 827 | 80 |
| Waste | 28 | 2 | <1 | 69 | 7 |
| Water | 17 | <1 | <1 | 19 | 2 |
| Total (1990/2020 Levels)[1] | 987 | 2 | <1 | 1,031 | 100 |
| 2020 Student Enrollment/School | | | | 750 | |
| **1990 Threshold (MT per student)** | | | | **1.4** | |

| Emission Source | $CO_2$ | $CH_4$ | $N_20$ | $CO_2e$ | Percentage of Total $CO_2e$ |
|---|---|---|---|---|---|
| **2030** | | | | | |
| 2030 GHG Emissions Limit (40% below 1990 levels per SB 32) | | | | 619 | |
| 2030 Student Enrollment/School | | | | 750 | |
| **2030 Threshold (MT per student)**[2] | | | | **0.82** | |

Source: CalEEMod and EMFAC. See Appendix D.

[1] Based on the state's GHG limit under AB 32, GHG emissions generated by District in 2020 are assumed to be equivalent to those emissions generated in 1990.

[2] The 2030 threshold was derived by reducing the 1990/2020 inventory by 40% (per SB 32) and dividing by the 2030 student enrollment per school, which is assumed to remain the same as 2020.

**Table 4.7-8. 1990 GHG Emissions Inventory for New High Schools (metric tons)**

| Emission Source | $CO_2$ | $CH_4$ | $N_20$ | $CO_2e$ | Percentage of Total $CO_2e$ |
|---|---|---|---|---|---|
| **1990/2020** | | | | | |
| Area | <1 | <1 | <1 | <1 | <1 |
| Energy | 277 | <1 | <1 | 278 | 11 |
| Mobile | 1,998 | <1 | <1 | 2,001 | 79 |
| Waste | 67 | 4 | <1 | 165 | 7 |
| Water | 74 | <1 | <1 | 83 | 3 |
| Total (1990/2020 Levels)[1] | 2,416 | 4 | <1 | 2,526 | 100 |
| 2020 Student Enrollment/School | | | | 1,800 | |
| **1990 Threshold (MT per student)** | | | | **1.4** | |
| **2030** | | | | | |
| 2030 GHG Emissions Limit (40% below 1990 levels per SB 32) | | | | 1,516 | |
| 2030 Student Enrollment/School | | | | 1,800 | |
| **2030 Threshold (MT per student)**[2] | | | | **0.84** | |

Source: CalEEMod and EMFAC. See Appendix D.

[1] Based on the state's GHG limit under AB 32, GHG emissions generated by District in 2020 are assumed to be equivalent to those emissions generated in 1990.

[2] The 2030 threshold was derived by reducing the 1990/2020 inventory by 40% (per SB 32) and dividing by the 2030 student enrollment per school, which is assumed to remain the same as 2020.

### Administrative Facilities

A district-specific efficiency threshold was determined for new administrative facilities using the same approach as elementary schools described above. However, as opposed to student enrollment, square footage of a single administrative facility is used. As shown in Table 4.7-9, the resulting target is 0.007 $MTCO_2e$ per square feet. GHG impacts from new administrative facility projects would be considered less than significant if they emit 0.007 $MTCO_2e$ or less per square feet. Please refer to Appendix D for modeling outputs in this analysis.

**Table 4.7-9. 1990 GHG Emissions Inventory for District Administrative Facilities (metric tons)**

| Emission Source | $CO_2$ | $CH_4$ | $N_20$ | $CO_2e$ | Percentage of Total $CO_2e$ |
|---|---|---|---|---|---|
| **1990/2020** | | | | | |
| Area | <1 | <1 | <1 | <1 | <1 |
| Energy | 361 | <1 | <1 | 362 | 16 |
| Mobile | 1,638 | <1 | <1 | 1,640 | 72 |
| Waste | 37 | 2 | <1 | 91 | 4 |
| Water | 159 | 1 | <1 | 196 | 9 |
| Total (1990/2020 Levels)[1] | 2,194 | 3 | <1 | 2,288 | 100 |
| 2020 Square Footage/Administrative Facility | | | | 194,000 | |
| **1990 Threshold (MT per square feet)** | | | | **0.012** | |
| **2030** | | | | | |
| 2030 GHG Emissions Limit (40% below 1990 levels per SB 32) | | | | 1,373 | |
| 2030 Square Footage/Administrative Facility | | | | 194,000 | |
| **2030 Threshold (MT per square feet)**[2] | | | | **0.007** | |

Source: CalEEMod and EMFAC. See Appendix D.

[1] Based on the state's GHG limit under AB 32, GHG emissions generated by the District in 2020 are assumed to be equivalent to those emissions generated in 1990.

[2] The 2030 threshold was derived by reducing the 1990/2020 inventory by 40% (per SB 32) and dividing by the 2030 square footage per administrative facility, which is assumed to remain the same as 2020.

### Academic Uses

The efficiency threshold for academic uses was derived from the District's 2020 GHG inventory for academic uses, which was quantified as part of this PEIR. The inventory was developed using CalEEMod, EMFAC2017, and 2019 student enrollment data and VMT from Chen Ryan (2019), consistent with the methodology outlined in 4.7.4.1, *Methodology*. It was assumed that student enrollment (120,495 students) will not differ substantially between 2019 and 2020, making the 2019 enrollment and associated VMT assumptions representative of 2020 conditions. This analysis assumes GHG emissions generated by District activities in 2020 are equivalent to those emissions generated in 1990. Table 4.7-10 presents the 1990/2020 inventory for academic uses. Please refer to Appendix D for the emission factors and outputs in this analysis.

As shown in Table 4.7-10, 1990/2020 emissions from District academic facilities are estimated to be 80,044 $MTCO_2e$, or 0.66 $MTCO_2e$ per student. Because SB 32 requires a 40% reduction in GHG emissions below 1990 levels by 2030, the 1990/2020 emissions from District academic facilities were reduced by 40% to calculate the District's 2030 GHG emissions target for academic facilities. This was estimated to be 48,027 $MTCO_2e$, which represents the emissions intensity that the District would need to meet in order to achieve its 2030 reduction target for academic uses, consistent with SB 32. Using 2030 student capacity, the resulting target is 0.27 $MTCO_2e$ per student. This threshold only applies to District projects that would increase student enrollment at existing academic facilities up to the current permitted capacity. GHG impacts from these projects would be considered less than significant if they emit 0.27 $MTCO_2e$ or less per student.

**Table 4.7-10. 1990 GHG Emissions Inventory for District Academic Facilities (metric tons)**

| Emission Source | $CO_2$ | $CH_4$ | $N_20$ | $CO_2e$ | Percentage of Total $CO_2e$ |
|---|---|---|---|---|---|
| **1990/2020** | | | | | |
| Area | 2 | <1 | <1 | 2 | <1 |
| Energy | 29,705 | 1 | <1 | 29,823 | 37 |
| Mobile | 37,649 | 2 | 2 | 38,244 | 48 |
| Waste | 4,464 | 264 | <1 | 11,059 | 14 |
| Water | 821 | 3 | <1 | 916 | 1 |
| Total (1990/2020 Levels)[1] | 72,642 | 270 | 2 | 80,044 | 100 |
| 2020 Student Enrollment | | | | 120,495 | |
| **1990 Threshold (MT per student)** | | | | **0.66** | |
| **2030** | | | | | |
| 2030 GHG Emissions Limit (40% below 1990 levels per SB 32) | | | | 48,027 | |
| 2030 Student Capacity | | | | 180,004 | |
| **2030 Threshold (MT per student)**[2] | | | | **0.27** | |

Source: CalEEMod and EMFAC. See Appendix D.

[1] 2020 student enrollment will not differ substantially from 2019 student enrollment. Therefore, the emissions inventory, which was calculated using 2019 student enrollment data and 2020 emission factors, is representative of 2020 conditions. Based on the state's GHG limit under AB 32, GHG emissions generated by District activities in 2020 are assumed to be equivalent to those emissions generated in 1990.

[2] The 2030 threshold was derived by reducing the 1990/2020 inventory by 40% (per SB 32) and dividing by the 2030 student capacity.

### Joint-Use Facilities

The efficiency threshold for joint-use facilities was derived from the District's 2020 GHG inventory for joint-use fields, which was quantified as part of this PEIR. The inventory was developed using CalEEMod, and 2019 joint-use field acreage data consistent with the methodology outlined in 4.7.4.1. Similar to academic uses, it was assumed that the total acreage of joint-use fields (443.3 acres) will not differ substantially between 2019 and 2020, making the 2019 assumptions representative of 2020 conditions. Please refer to Appendix D for modeling outputs in this analysis.

As shown in Table 4.7-11, 1990/2020 emissions from District joint-use facilities are 19,536 $MTCO_2e$, or 52.2 $MTCO_2e$ per acre. Similar to academic uses, the 1990/2020 emissions from District joint-use facilities was reduced by 40% to calculate the District's 2030 GHG emissions target for joint-use facilities. This was estimated to be 11,573 $MTCO_2e$, which represents the emissions intensity that the District would need to meet in order to achieve its 2030 reduction target for academic uses, consistent with SB 32. Using the 2030 acreage, the resulting target is 26.4 $MTCO_2e$ per acre. This threshold only applies to District projects that would result in new acreage of joint-use fields. GHG impacts from these projects would be considered less than significant if they emit 26.4 $MTCO_2e$ or less per acre.

**Table 4.7-11. 1990 GHG Emissions Inventory for Joint-Use Facilities (metric tons)[a]**

| Emission Source | $CO_2$ | $CH_4$ | $N_20$ | $CO_2e$ | Percentage of Total $CO_2e$ |
|---|---|---|---|---|---|
| **1990/2020** | | | | | |
| Area | 718 | <1 | <1 | 723 | 4 |
| Energy[1] | 247 | <1 | <1 | 248 | 1 |
| Mobile | 17,445 | 1 | <1 | 17,471 | 89 |
| Waste | 7 | <1 | <1 | 16 | 6 |
| Water | 1,074 | <1 | <1 | 1,077 | 100 |
| Total (1990/2020 Levels)[2] | 19,490 | 2 | <1 | 19,536 | 4 |
| 2020 Acreage | | | | 374.2 | |
| **1990 threshold (MT per acre)** | | | | 52.2 | |
| **2030** | | | | | |
| 2030 GHG Emissions limit (40% below 1990 levels per SB 32) | | | | 11,721 | |
| 2030 Acreage | | | | 443.3 | |
| **2030 Threshold (MT per acre)[3]** | | | | **26.4** | |

Source; CalEEMod and EMFAC. See Appendix D.

[1] Per the District, 20% of joint-use field acreage is representative of associated parking area lighting.

[2] 2020 joint-use field acreage will not differ substantially from 2019 acreage. Therefore, the emissions inventory, which was calculated using 2019 acreage data and 2020 emission factors, is representative of 2020 conditions. Based on the state's GHG limit under AB 32, GHG emissions generated by District activities in 2020 are assumed to be equivalent to those emissions generated in 1990.

[3] The 2030 threshold was derived by reducing the 1990/2020 inventory by 40% (per SB 32) and dividing by the 2030 acreage.

## Sector-by-Sector Evaluation

Specific project-level details for new capacity-increasing schools and non-school uses that may be developed under the Program are not currently known. As such, the baseline inventory and derived threshold does not include emissions from these potential projects, and emissions presented in this PEIR only represent a portion of all emissions associated with the Proposed Program. Therefore, the Proposed Program is further evaluated on a sector-by-sector (e.g., water, energy) basis using the most applicable regulatory programs and policies recommended by CARB and OPR, as described in the *Compliance with Regulatory Programs* section above. As noted above, the state has reduction goals of 40% below 1990 emissions levels by 2030. The state's 2030 target has been codified in law through SB 32 and the 2017 Scoping Plan adopted to meet this goal. Therefore, 2030 marks the next statutory statewide milestone target applicable to the Proposed Program. The analysis focuses on the 2030 target and the plans, policies, and regulations adopted pursuant to achieving 2030 reductions. Where applicable, guidance from CARB, OPR, and other agencies related to long-term emissions reduction requirements is incorporated into the analysis.

- **Mobile sources**: CARB's 2017 Scoping Plan recognizes that while vehicle technologies and low carbon fuels will continue to reduce transportation sector emissions, VMT reductions are necessary to achieve California's long-term GHG reduction target. OPR (2018) identifies a series of potential measures to reduce VMT, including increasing "access to common goods and services, such as groceries, schools, and daycares." Increasing the amount of schools is one means to increase school access and, thus, reduce VMT. Accordingly, mobile source emissions would be considered less than significant because the Proposed Program would not result in an

increase in per capita (i.e., student) VMT. In addition, compliance with regulatory programs (e.g., AB 1493, LCFS, SB 743, and SB 375) would also be required to reduce the statewide mobile GHG emissions for a less-than-significant impact.

- **Area, energy, land use, water, and waste sources.** CARB's 2017 Scoping Plan, which relies heavily on state programs (e.g., Title 24 and SB 100), outlines strategies required to reduce statewide GHG emissions in order to achieve California's SB 32 reduction target. Projects that implement applicable strategies from the 2017 Scoping Plan would be consistent with the state's GHG reduction framework and requirements for these sectors. Accordingly, a sector-by-sector review of the respective project features and sustainability measures included in the Proposed Program is conducted to evaluate consistency with the 2017 Scoping Plan. This assessment also considers recent OPR (2018) guidance related to the long-term reduction of statewide emissions. Thus, area, energy, land use, water, and waste sources emissions would be considered less than significant if a project is consistent with all applicable 2017 Scoping Plan strategies and supporting regulations and guidance.

# 4.7.4.3 Impacts and Mitigation Measures

***Threshold 1: Would implementation of the Proposed Program generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

## Program-Level Analysis

The analysis of GHG impacts includes an evaluation of the Proposed Program's construction and operational emissions. Where possible, emissions were quantified and presented. The Proposed Program's operational analysis considers the District's 2030 efficiency thresholds, developed as part of this PEIR, and a sector-by-sector review of the Proposed Program's features.

### New Acquisition and New School or Administrative Facilities and Proposed Program Buildout

#### Impact Discussion

##### *Construction*

Construction associated with new school or administrative facilities would result in the temporary generation of GHG emissions that could result in impacts on climate change. The same types of construction activities that would generate criteria pollutants would also generate GHG emissions (refer to Section 4.2). Emissions could originate from mobile and stationary construction equipment exhaust and employee and haul truck vehicle exhaust. Construction-related emissions would vary substantially depending on the level of activity, length of the construction period, specific construction operations, types of equipment, and number of personnel.

By its nature as a program, the Proposed Program does not propose any specific projects other than the 21 near-term, site-specific whole site modernization projects (see below). Construction of projects under the Proposed Program would occur intermittently within District boundaries throughout the course of the buildout period. As the timing and intensity of future projects are not known at this time, the precise effects of construction activities associated with Program buildout

cannot be accurately quantified. The details of future projects, including number and scope of projects, is currently unknown because projects would be driven by District needs and other economic and planning considerations. As such, it is anticipated that in any given year, multiple projects could be constructed within the Program area.

As noted previously, there are no relevant quantitative thresholds for assessing construction-related GHG emissions for new acquisitions and new school or administrative facilities. While the construction emission impacts associated with each new project would be short-term in nature (relative to the buildout year) and limited to the period of time when construction activity is taking place for that particular project, the concurrent construction of a multitude of individual projects that could occur at any one time under the Proposed Program would generate combined GHG emissions. Additionally, depending on the size and scale of an individual project, along with its construction schedule and other parameters, there may also be instances where the construction-related emissions generated by a single project could be substantial. For instance, new school projects would require heavy equipment use for activities such as demolition, ground disturbance, and grading, and would occur over multiple years. As such, construction emissions generated by implementation of the Proposed Program are assumed to result in a potentially significant GHG impact (**Impact-GHG-1).** Implementation of **MM-AQ-2** would reduce construction-related GHG emissions from diesel-powered off-road construction equipment. Implementation of **MM-GHG-1** would reduce associated emissions from construction activities by using local building materials to reduce trip lengths and overall VMT of material delivery trucks, recycling construction waste or demolition materials to reduce energy consumption associated with raw material production and diverting waste from landfills, implementing employee carpool programs to encourage construction workers to carpool to project sites to reduce single occupancy vehicle trips and VMT, and maintaining all construction equipment in proper working condition according to manufacturers' specifications to ensure maximizing fuel efficiency. However, the associated GHG emissions reductions from **MM-GHG-1** are unknown at this time. Therefore, after mitigation, **Impact-GHG-1** would remain significant and unavoidable**.**

***Operation***

The Proposed Program would be constructed over 10 years through 2030, with operations occurring concurrently with construction. Therefore, operational GHG emissions would include overlapping construction emissions. However, as described above, a quantified analysis of potential GHG emissions during construction and operation is not possible. District-specific efficiency thresholds were developed for new acquisitions and new schools, and administrative buildings. Impacts from these projects would be less than significant if the District's 2030 efficiency thresholds of 0.68 $MTCO_2e$ per elementary school student, 0.82 $MTCO_2e$ per junior high school student, 0.84 $MTCO_2e$ per high school student, and 0.007 $MTCO_2e$ per square foot for each administrative facility are not exceeded. At this time, the specific details for future projects are unknown. Therefore, operational emissions generated by new acquisition and new school or administrative facilities, and the Proposed Program buildout are assumed to result in a potentially significant GHG impact (**Impact-GHG-2**).

As discussed under *Applicable Laws and Regulations/Local* (Section 4.7.3.4), the District has implemented many programs and policies focused on energy conservation, energy efficiency, and sustainability, and the District would continue to implement these initiatives. The District plans to increase its PV solar production to produce 42.6 million kilowatt-hours (kWh) and an overall system size of 32.1 megawatts by 2030. The District will continue to retrofit interior and exterior lighting

with energy efficient LED lighting. The District plans to have all school sites updated with LED lighting by 2030, which would result in saving approximately 19% of the District's electricity load. The District would continue to update all school sites to have Energy Management Systems, which would result in an estimated 7% savings in kWh per year per site. The District would also continue exploring opportunities to install energy storage facilities at school sites. These programs would produce renewable energy and increase energy efficiency, thus reducing GHG emissions. Furthermore, these projects would be consistent with state and District goals for reducing GHG emissions and support initiatives in the District's *Dream Big* initiatives and ZNE Plan.

Aside from the physical upgrades, the District has also implemented practices and policies (BP 3510, BP 2511, and AR 3511) to improve the conservation habits and attitudes of its staff and students through the ZNE Plan. This is a collaborative effort among all school sites to provide information to staff and students on energy conservation practices. In order to increase school site participation, the District may in the future create a competition, and rank sites by energy savings, with the Board of Education recognizing the top performing sites. Overall, improving and increasing conservation habits of the District staff and students would increase energy-efficiency and reduce GHG emissions through reduced energy and resource demand.

Implementation of **MM-GHG-2** would ensure the Proposed Program's future projects would reduce operational GHG emissions by incorporating sustainable and energy-efficient design features into all new acquisition and new school or administrative facilities and Program Buildout. However, although MM-GHG-2 would reduce GHG emissions in various sectors, it may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-2** would remain significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-GHG-1: Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Construction.** Depending on the size and scale of an individual project, along with its construction schedule and other parameters, there may also be instances where the construction-related emissions generated by a single project could be substantial. This is a potentially significant impact.

#### *Operation*

**Impact-GHG-2: Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Operation.** The Proposed Program could result in long-term greenhouse gas emissions, exceeding District-specific thresholds, where applicable. Future projects would be encouraged to implement District-wide sustainability actions per the *Dream Big* initiative, Collaborative for High Performance Schools criteria, Zero Net Energy Plan, and the District's Board policies and administrative regulations. However, while the District would aim to implement all applicable actions and design criteria, there is no guarantee that all actions and design criteria will be incorporated into the project design of all future projects or that these measures would be effective in meeting the District's efficiency thresholds. Therefore, the Proposed Program is conservatively assumed to conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan. This is a potentially significant impact.

### Mitigation Measures

For **Impact-GHG-1**:

Implement **MM-AQ-2: Require Construction Fleet to Use Renewable Diesel**, as described in Section 4.2.

**MM-GHG-1: Implement Best Management Practices During Construction.** The District shall incorporate best management practices to reduce greenhouse gas emissions during construction, as applicable. Best management practices may include, but are not limited to:

- Use local building materials.
- Recycle construction waste or demolition materials.
- Implement employee carpool programs.
- Maintain all construction equipment in proper working condition according to manufacturers' specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

For **Impact-GHG-2**:

**MM-GHG-2: Incorporate Sustainable Design Features:** To ensure future projects would reduce operational greenhouse gas (GHG) emissions, during project planning and design phases, the District shall require all future projects to incorporate sustainable design features, including, but not limited to, the following:

- All interior/exterior lighting shall be LED lighting.
- Photovoltaic (PV) solar systems shall be installed at school sites that meet the siting criteria in the District's *Solar PV Design Guide*.
- All school sites shall have an Energy Management System to control heating, ventilation, and air conditioning (HVAC) systems for all school site rooms.
- All school sites shall provide adequate amounts of trash, recycle, and food waste receptacles that are easily accessible to staff and students.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-AQ-2** would reduce construction-related GHG emissions from diesel-powered off-road construction equipment. Implementation of **MM-GHG-1** would reduce associated emissions from off-road construction equipment and emissions from the waste and mobile sectors. However, the associated GHG emissions reductions from **MM-GHG-1** are unknown at this time. Therefore, after mitigation, **Impact-GHG-1** would remain significant and unavoidable**.**

#### *Operation*

Implementation of **MM-GHG-2** would reduce operational GHG emissions by reducing emissions in various sectors but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-2** would remain significant and unavoidable.

## Whole Site Modernization and Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Construction related to whole site modernization projects and upgrades of existing school and administrative sites would result in the temporary generation of GHG emissions that could result in impacts on climate change. The same types of construction activities that would generate criteria pollutants would also generate GHG emissions (refer to Section 4.2). Emissions could originate from mobile and stationary construction equipment exhaust and employee and haul truck vehicle exhaust. Construction-related emissions would vary substantially depending on the level of activity, length of the construction period, specific construction operations, types of equipment, and number of personnel.

Construction related to whole site modernizations and upgrades of existing school and administrative sites would occur intermittently within District boundaries throughout the course of the buildout period. As the timing and intensity of future projects are not known at this time, the precise effects of construction activities associated these project categories cannot be accurately quantified. The details of future projects, including their number and scope, are currently unknown because projects would be driven by District needs and economic and planning considerations. As such, it is anticipated that in any given year, multiple projects could be constructed within the Program area.

As noted previously, there are no relevant quantitative thresholds for assessing construction-related GHG emissions for whole site modernizations and upgrades of existing school and administrative sites. While the construction emission impacts associated with each new project would be short-term in nature (relative to the buildout year) and limited to the period of time when construction activity is taking place for that particular project, the concurrent construction of a multitude of individual projects that could occur at any one time under the Proposed Program would generate combined GHG emissions. Additionally, depending on the size and scale of an individual project, along with its construction schedule and other parameters, there may also be instances where the construction-related emissions generated by a single project could be substantial. For instance, whole site modernization projects would require heavy equipment use for activities such as demolition, ground disturbance, and grading, and would occur over multiple years. In contrast, other projects (e.g., upgrades of existing school and administrative sites) would require minimal to no ground disturbance and light equipment over a shorter duration. As such, construction emissions generated by implementation of the Proposed Program are assumed to result in a potentially significant GHG impact (**Impact-GHG-1).** Implementation of **MM-AQ-2** would reduce construction-related GHG emissions from diesel-powered off-road construction equipment. Implementation of **MM-GHG-1** would reduce associated emissions from construction activities by using local building materials to reduce trip lengths and overall VMT of material delivery trucks, recycling construction waste or demolition materials to reduce energy consumption associated with raw material production and diverting waste from landfills, implementing employee carpool programs to encourage construction workers to carpool to project sites to reduce single occupancy vehicle trips and VMT, and maintaining all construction equipment in proper working condition according to manufacturers' specifications to ensure maximizing fuel efficiency. However, the associated GHG

emissions reductions from **MM-GHG-1** are unknown at this time. Therefore, after mitigation, **Impact-GHG-1** would remain significant and unavoidable**.**

***Operation***

As described above, operational GHG emissions would include overlapping construction emissions. However, as described above a quantified analysis of potential GHG emissions during construction and operation is not possible for whole site modernization and upgrades of existing school and administrative sites. Therefore, a quantified analysis of operational emissions was completed.

Buildout of these projects has the potential to result in GHG impacts from area, energy, mobile, water, and wastewater sources. Table 4.7-12 summarizes area, energy, mobile, water, and wastewater source emission estimates generated by academic facilities under existing (2019) and 2030 conditions with and without the Proposed Program.

**Table 4.7-12. Existing and Proposed Operational GHG Emissions for Non-Capacity-Increasing Academic Facilities (metric tons per year)**

| Condition | $CO_2$ | $CH_4$ | $N_20$ | $CO_2e$ | Percentage of Total $CO_2e$ |
|---|---|---|---|---|---|
| **Existing (2019)[1]** | | | | | |
| Area Sources | 2 | <1 | <1 | 2 | <1 |
| Energy Sources | 30,611 | 2 | <1 | 30,747 | 38 |
| Mobile Sources | 38,671 | 2 | 2 | 38,244 | 49 |
| Waste Sources | 4,464 | 264 | <1 | 11,059 | 14 |
| Water Sources | 853 | 3 | <1 | 948 | 1 |
| Total[2] | 73,578 | 270 | 2 | 81,001 | 100 |
| **With Program (2030)** | | | | | |
| Area Sources | 3 | <1 | <1 | 3 | <1 |
| Energy Sources | 30,784 | 1 | <1 | 30,886 | 30 |
| Mobile Sources | 53,085 | 3 | 3 | 53,952 | 53 |
| Waste Sources | 6,668 | 394 | <1 | 16,521 | 16 |
| Water Sources | 753 | 4 | <1 | 892 | 1 |
| Total[3] | 91,294 | 402 | 3 | 102,255 | 100 |
| 2030 Student Capacity | | | | 180,004 | |
| $MTCO_2e$ per student | | | | 0.57 | |
| Efficiency Threshold (metric tons per student)[4] | | | | 0.27 | |
| Exceed Threshold? | | | | **Yes** | |

Source: CalEEMod. See Appendix D.

[1] Based on 120,495 in 2019.

[2] Values may not add up due to rounding.

[3] Based on 180,004 students in 2030.

[4] See "Threshold Approach" under Section 4.7.4.2*, Thresholds of Significance* above for a detailed description regarding this threshold and how it was derived.

Note: The Proposed Program could plant and/or remove trees, but the exact number of trees to be planted or removed is currently unknown; thus, this table does not account for land use emissions. In addition, this table does not account for stationary source emissions for academic uses. Further, area emissions for joint-use facilities include emissions from landscaping equipment.

As shown in Table 4.7-12, increases in student enrollment at existing academic facilities up to the current permitted capacity would result in a net increase of approximately 21,254 $MTCO_2e$ per year compared to existing conditions. These academic uses under the Proposed Program would exceed the District's 2030 efficiency thresholds of 0.27 $MTCO_2e$ per student. Upgrades of existing school sites are not likely to increase student enrollment or emissions, relative to existing conditions. Rather, these projects may enhance operational efficiency of existing buildings, resulting in GHG emissions reductions. These potential benefits are not reflected in Table 4.2-12. However, emissions exclusively associated with upgrades of existing school sites cannot be precisely determined.[7] As such, operational impacts associated with non-capacity-increasing academic facilities are conservatively assumed to be potentially significant (**Impact-GHG-2**). Implementation of **MM-GHG-2** would reduce operational GHG emissions by reducing emissions in various sectors but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-2** would remain significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-GHG-1: Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Construction.** Depending on the size and scale of an individual project, along with its construction schedule and other parameters, there may also be instances where the construction-related emissions generated by a single project could be substantial. This is a potentially significant impact.

#### *Operation*

**Impact-GHG-2: Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Operation.** The Proposed Program could result in long-term greenhouse gas emissions, exceeding District-specific thresholds, where applicable. Future projects would be encouraged to implement District-wide sustainability actions per the *Dream Big* initiative, Collaborative for High Performance Schools criteria, Zero Net Energy Plan, and the District's Board policies and administrative regulations. However, while the District would aim to implement all applicable actions and design criteria, there is no guarantee that all actions and design criteria will be incorporated into the project design of all future projects or that these measures would be effective in meeting the District's efficiency thresholds. Therefore, the Proposed Program is conservatively assumed to conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan. This is a potentially significant impact.

### Mitigation Measures

For **Impact-GHG-1**:

Implement **MM-AQ-2**, as described in Section 4.2, and **MM-GHG-1**, as described above**.**

For **Impact-GHG-2**:

Implement **MM-GHG-2,** as described above.

[7] Emissions were estimated with enrollment data provided by the traffic engineers and were not delineated by project category.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-AQ-2** would reduce construction-related GHG emissions from diesel-powered off-road construction equipment. Implementation of **MM-GHG-1** would reduce associated emissions from off-road construction equipment and emissions from the waste and mobile sectors. However, the associated GHG emissions reductions from **MM-GHG-1** are unknown at this time. Therefore, after mitigation, **Impact-GHG-1** would remain significant and unavoidable**.**

#### *Operation*

Implementation of **MM-GHG-2** would reduce operational GHG emissions by reducing emissions in various sectors but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-2** would remain significant and unavoidable.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

The same types of construction activities that would generate criteria pollutants would also generate GHG emissions (refer to Section 4.2) during the construction of joint-use facilities. Assumptions for previous joint-use facility projects were provided by the District and utilized to model construction emissions for future joint-use facilities under the Proposed Program. As the specific construction schedule is not known, annual emissions cannot be determined at this time. Therefore, Table 4.7-13 conservatively presents the total emissions associated with the construction of future joint-use facilities.

**Table 4.7-13. Total Construction GHG Emissions for Joint-Use Facilities (metric tons)**

| Condition | $CO_2$ | $CH_4$ | $N_20$ | $CO_2e$ |
|---|---|---|---|---|
| Future Joint-Use Facilities[1] | 6,942 | 2 | <1 | 6,989 |

Source: CalEEMod. See Appendix D.
[1] Per District data, 20 joint-use facilities totaling 69.09 acres would be constructed under the Proposed Program.

As described above, there are no relevant quantitative thresholds for assessing construction-related GHG emissions for joint-use facilities. Therefore, emissions generated by joint-use facilities through implementation of the Proposed Program are conservatively assumed to result in a potentially significant GHG impact (**Impact-GHG-1**)**.** Implementation of **MM-AQ-2** would reduce construction-related GHG emissions from diesel-powered off-road construction equipment. Implementation of **MM-GHG-1** would reduce associated emissions from construction activities by using local building materials to reduce trip lengths and overall VMT of material delivery trucks, recycling construction waste or demolition materials to reduce energy consumption associated with raw material production and diverting waste from landfills, implementing employee carpool programs to encourage construction workers to carpool to project sites to reduce single occupancy vehicle trips and VMT, and maintaining all construction equipment in proper working condition according to manufacturers' specifications to ensure maximizing fuel efficiency. However, the associated GHG

emissions reductions from **MM-GHG-1** are unknown at this time. Therefore, after mitigation, **Impact-GHG-1** would remain significant and unavoidable**.**

***Operation***

As described above, operational GHG emissions would include overlapping construction emissions. Joint-use facilities have the potential to result in GHG impacts from area, energy, mobile, water, and wastewater sources. Table 4.7-14 summarizes area, energy, mobile, water, and waste source emission estimates generated by joint-use facilities under existing (2019) and 2030 conditions with and without the Proposed Program. Emission estimates includes emissions from the construction of joint-use facilities.

**Table 4.7-14. Existing and Proposed Operational GHG Emissions for Joint-Use Facilities (metric tons per year)**

| Condition | $CO_2$ | $CH_4$ | $N_20$ | $CO_2e$ | Percentage of Total $CO_2e$ |
|---|---|---|---|---|---|
| **Existing (2019)[1]** | | | | | |
| Area Sources | 721 | <1 | <1 | 727 | 4 |
| Energy Sources[2] | 257 | <1 | <1 | 258 | 1 |
| Mobile Sources | 17,445 | 1 | <1 | 17,471 | 89 |
| Waste Sources | 7 | <1 | <1 | 16 | <1 |
| Water Sources | 1,117 | <1 | <1 | 1,121 | 6 |
| Total[3] | 19,289 | 2 | <1 | 19,593 | 100 |
| **With Program (2030)** | | | | | |
| Construction | 6,942 | 2 | <1 | 6,989 | 24 |
| Operation[4] | | | | | |
| Area Sources | 856 | <1 | <1 | 862 | 3 |
| Energy Sources[2] | 176 | <1 | <1 | 176 | 1 |
| Mobile Sources | 20,666 | 1 | <1 | 20,697 | 70 |
| Waste Sources | 8 | <1 | <1 | 19 | <1 |
| Water Sources | 764 | <1 | <1 | 765 | 3 |
| Total[3] | 22,469 | 2 | <1 | 29,508 | 100 |
| Net Change (Buildout v. Existing) | | | | 9,915 | |
| 2030 Acreage | | | | 443.3 | |
| 2030 $MTCO_2e$ per acre | | | | 66.6 | |
| Efficiency Threshold ($MTCO_2e$ pet acre)[5] | | | | 26.4 | |
| Exceed Threshold? | | | | **Yes** | |

Source: CalEEMod. See Appendix D.

[1] Based on 374.2 acres in 2019.

[2] Per the District, 20% of joint-use field acreage is representative of associated parking area lighting.

[3] Values may not add up due to rounding.

[4] Based on 443.3 acres in 2030.

[5] See *Threshold Approach* under Section 4.7.4.2 for a description regarding this threshold and how it was derived.

Note: The Proposed Program could plant and/or remove trees, but the exact number of trees to be planted or removed is currently unknown; thus, this table does not account for land use emissions. In addition, this table does not account for stationary source emissions for academic uses. Further, area emissions for joint-use facilities include emissions from landscaping equipment.

Joint-use facilities development would result in a net increase of approximately 9,915 $MTCO_2e$ per year compared to existing conditions. Joint-use facilities emissions would exceed the District's 2030 efficiency thresholds of 26.4 $MTCO_2e$ per acre, respectively. This is a potentially significant impact (**Impact-GHG-2**). Implementation of **MM-GHG-2** would reduce operational GHG emissions by reducing emissions in various sectors but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-2** would remain significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-GHG-1: Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Construction.** Depending on the size and scale of an individual project, along with its construction schedule and other parameters, there may also be instances where the construction-related emissions generated by a single project could be substantial. This is a potentially significant impact.

#### *Operation*

**Impact-GHG-2: Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Operation.** The Proposed Program could result in long-term greenhouse gas emissions, exceeding District-specific thresholds, where applicable. Future projects would be encouraged to implement District-wide sustainability actions per the *Dream Big* initiative, Collaborative for High Performance Schools criteria, Zero Net Energy Plan, and the District's Board policies and administrative regulations. However, while the District would aim to implement all applicable actions and design criteria, there is no guarantee that all actions and design criteria will be incorporated into the project design of all future projects or that these measures would be effective in meeting the District's efficiency thresholds. Therefore, the Proposed Program is conservatively assumed to conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan. This is a potentially significant impact.

### Mitigation Measures

For **Impact-GHG-1**:

Implement **MM-AQ-2**, as described in Section 4.2, and **MM-GHG-1,** as described above**.**

For **Impact-GHG-2**:

Implement **MM-GHG-2,** as described above.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-AQ-2** would reduce construction-related GHG emissions from diesel-powered off-road construction equipment. Implementation of **MM-GHG-1** would reduce associated emissions from off-road construction equipment and emissions from the waste and mobile sectors.

However, the associated GHG emissions reductions from **MM-GHG-1** are unknown at this time. Therefore, after mitigation, **Impact-GHG-1** would remain significant and unavoidable**.**

***Operation***

Implementation of **MM-GHG-2** would reduce operational GHG emissions by reducing emissions in various sectors but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-2** would remain significant and unavoidable.

## Sector-by-Sector Analysis

### Impact Discussion

As noted above, the Proposed Program is also evaluated for its compliance with regulatory programs adopted by CARB and other state agencies. The following sections presents the sector-by-sector analysis of GHG impacts.

***Construction***

Construction activities would primarily involve mobile on- and off-road sources, which would generate GHG emissions from off-road construction equipment (e.g., graders, loaders, forklifts), heavy duty trucks for material delivery and hauling, and construction worker passenger vehicles. While GHG emissions from construction activities cannot be accurately quantified, the Proposed Program would continue to further the District's sustainability goals.

Implementation of **MM-GHG-1** would reduce construction GHG emissions by promoting best management practices, including use of local materials, recycling of waste and debris, implementing carpools, and requiring equipment to be maintained, all of which would reduce on- and off-road emissions by reducing vehicle trips and emissions from equipment. Implementation of **MM-GHG-1** would reduce construction GHG emissions by reducing emissions from mobile sources but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-1** would remain significant and unavoidable.

***Operation***

*Area Source Emissions*

Area source GHG emissions from the Proposed Program would be generated by landscaping-related fuel combustion sources, such as lawn mowers and aerators.

CARB has not developed any relevant measures in the 2017 Scoping Plan or other regulations related to area source emissions. CARB adopted emissions standards for small off-road engines (i.e., landscape equipment) in 1990. More recently, CARB stated their intent to consider new standards for small engines in 2020, including regulatory and incentive approaches and a major shift to zero-emission equipment (CARB 2017c). However, to date, adopted CARB emission standards are aimed at reducing smog-forming pollutants. No standards have been adopted pursuant to reducing GHG emissions from small off-road engines.

While the 2017 Scoping Plan does not include specific measures or 2030 emissions reduction requirements for landscaping equipment, OPR (2018) guidance recommends that land use projects strive to avoid fossil fuels.

The Proposed Program would be consistent with the District's design guide, Board policies, and administrative regulations to reduce emissions from area sources and aim to further the District's compliance with CHPS criteria related to area sources. This includes maximizing the use of green consumer products and planting native and low water usage plants, especially ones that require minimal pruning and maintenance thereby minimizing the use of trimmers and mowers (the District 2016, CHPS 2014). The *Dream Big* initiative also calls for the active replacing of landscaping with drought-tolerant planting (District 2014). Plant material selection should also be based on climatic zones, soil type, and maintenance needs and be consistent with the District's design guide (District 2016) and AR 3511, which outline strategies related to conserving water during landscaping activities. The District also aims to reduce non-toxic odors and promote zero volatile organic compounds (VOC) (District n.d.)

Future projects under the Proposed Program would aim to implement these actions where applicable. If fully implemented, the Proposed Program would not conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan. However, if not fully implemented, the Proposed Program would conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan (**Impact-GHG-2**). This impact would be significant.

Implementation of **MM-GHG-2** would reduce operational GHG emissions by reducing emissions in various sectors but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-2** would remain significant and unavoidable.

*Energy Source Emissions*

GHGs are emitted directly from buildings through the combustion of any type of fuel (e.g., natural gas for cooking). GHGs can also be emitted indirectly from the generation of electricity. The 2017 Scoping Plan outlines strategies to reduce energy demand and fossil fuel use, while increasing energy efficiency and renewable energy generation. These strategies include transitioning to cleaner fuels, greater efficiency in existing buildings, and electrification of end uses. Several of these strategies are reflected in state laws and regulatory programs. For example, SB 100 requires a doubling of energy efficiency by 2030 and an RPS of 60% renewable by 2030. SB 100 also sets a target of 100% carbon-free electricity by 2045. The 2019 Title 24 standards mandate higher efficiency levels and rooftop solar photovoltaic systems for all new residential buildings constructed in 2020 and beyond. Future standards are expected to result in zero net energy for newly constructed commercial buildings. The CEC also enforces the Appliance Efficiency Regulations contained in Title 20 of the California Code of Regulations. The regulations establish water and energy efficiency standards for both federally regulated and non-federally regulated appliances.

The District is committed to the considered utilization of a wide variety of existing and emerging renewable energy sources on school campuses, including a 90% energy offset goal. The Proposed Program would continue to further the District's energy efficiency and conservation goals per the *Dream Big* initiative, Board policies, administrative regulations, and design guide. District-wide goals include going off-grid with solar, adopting net zero energy by 2030, and increasing LED lighting (District 2014, 2017c). The *Dream Big i*nitiative calls for new construction and remodels to use LED lighting, replacing parking lot and exterior lighting with comparable LED lighting, replacing

bulbs with comparable lumen LED lights, and developing a plan and schedule per school to switch to LED lighting. Future projects under the Proposed Program would encourage features such as onsite renewable solar for net zero energy or a 90% offset goal, LED lighting, and energy management systems. These features are also consistent with CHPS criteria (2014). Additionally, the District's AR 3511 provides energy conservation operating guidelines for a school site's lighting, HVAC systems, water heaters, and electrical equipment and appliances. For example, some strategies include setting specific heating and cooling points for summer and winter months, requiring that lighting be turned off once all students and staff have left a school facility, and that all outside lighting be off during daytime hours. Future projects under the Proposed Program would aim to implement these actions where applicable. If fully implemented, the Proposed Program would not conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan. However, if not fully implemented, the Proposed Program would conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan (**Impact-GHG-2**). This would be a significant impact. Implementation of **MM-GHG-2** would reduce operational GHG emissions by reducing emissions in various sectors but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-2** would remain significant and unavoidable.

*Land Use Emissions*

Conversion of natural lands during construction would result in the one-time loss of carbon sequestration potential.

The 2017 Scoping Plan identifies increasing sequestration as crucial to achieving the state's climate change strategy. It outlines objectives to maintain natural lands as a resilient carbon sink and sets a goal to reduce GHG emissions from natural and working lands by at least 15–20 million $MTCO_2e$ by 2030. SB 1386 also identifies the protection and management of natural and working lands as a key strategy towards meeting the state's 2030 GHG reduction target.

The Proposed Program would continue to further the District's land use goals through consistency with the District's landscaping design guide and CHPS criteria. This includes tree and shrub plantings, particularly native species that require minimal water and provide shade, and tree replacements (District 2016, CHPS 2014). The *Dream Big Initiative* calls for the incorporation of trees into new construction and remodel opportunities (District 2014). In addition, tree planting and replanting considerations (including species) per the District's design guide would support the District's sustainable goals (District 2016). Future projects under the Proposed Program would aim to implement these actions where applicable. If fully implemented, the Proposed Program would not conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan. However, if not fully implemented, the Proposed Program would conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan (**Impact-GHG-2**). This would be a significant impact. Implementation of **MM-GHG-2** would reduce operational GHG emissions by reducing emissions in various sectors but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-2** would remain significant and unavoidable.

*Mobile Source Emissions*

GHG emissions associated with on-road mobile sources are generated from students and teachers within the District. As shown in Table 4.7-13, emissions from mobile sources represent the largest source of Program emissions from non-capacity-increasing facilities and are expected to increase,

relative to existing conditions. This increase is primarily driven by the additional VMT expected as a result of the increase in student enrollment throughout the District. However, the Proposed Program would continue to further the District's transportation sustainability goals by reducing District-wide VMT. As discussed in Section 4.13, *Transportation,* although the Proposed Program results in an increase in VMT, the per student VMT is decreased for academic facilities. This is the result of students returning to or enrolling in their assigned District school and having shorter commutes. In addition, the Proposed Program would not conflict with the District's ongoing efforts involving its bus retrofit and fleet turnover programs. Therefore, the Proposed Program would not conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan. Impacts related to mobile source emissions would be less than significant.

*Waste Source Emissions*

Solid waste emissions result from $CH_4$ associated with the decomposition of waste, and $CO_2$ emissions associated with the combustion or flaring of methane. Solid waste may be disposed in landfills or diverted for recycling, composting, reuse, or other means to avoid landfilling.

The 2017 Scoping Plan aims to reduce waste emissions by diverting waste away from landfills through waste reduction, re-use, composting, and material recovery. It does not set quantitative targets for reducing waste emissions but does aim to reduce the amount of waste that enters landfills. The plan has a goal of 14% reduction in solid waste related GHG emissions due to organic diversion (i.e., composting). AB 341 requires mandatory recycling for certain commercial businesses. AB 341 also established a statewide recycling goal of 75% by the year 2020, which the City adopted in 2015 (City of San Diego 2015b). Implementation measures include source reduction, recycling, or composting. Forthcoming regulations pursuant to SB 1383 will establish minimum standards for organic waste collection, hauling, and composting. The final regulations will take effect on or after January 1, 2022.

The Proposed Program would aim to further the District's waste reduction goals per its *Dream Big* initiative and design guide, CHPS criteria, Board policies, and administrative regulations. District-wide goals include net zero waste, solid waste reduction and recycling, and food waste reduction. Future projects under the Proposed Program would be required to meet the District's construction and demolition diversion requirements, which consist of metal and mixed material recycling (District 2014). This includes implementing a construction waste management plan and specifying the diversion rate through recycling, compositing, or salvage. The *Dream Big* initiative includes actions such as developing a dashboard to track waste costs, incorporating waste diversion goals through a larger CAP effort, exploring new materials management programs, and identifying options to reduce food services packaging (District 2014). In addition, consistent with CHPS criteria, future projects would be encouraged to reuse building features and provide centralized collection points for recycling bins, solid waste receptors, and compositing (CHPS 2014). The District's design guide also outlines actions to reduce the waste stream by the use of plant materials that require minimal water, are low maintenance, and minimize green litter waste (District 2016). As discussed in Section 4.7.3.4, per AB 1826, the District is now required to recycle organic material, such as kitchen waste from school meal programs; as such, future projects under the Proposed Program would also be subject to AB 1826. Future projects under the Proposed Program would aim to implement these actions where applicable. If fully implemented, the Proposed Program would not conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan. However, if not fully implemented, the Proposed Program would conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan (**Impact-GHG-2**). This would be a significant impact. Implementation of

**MM-GHG-2** would reduce operational GHG emissions by reducing emissions in various sectors but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-2** would remain significant and unavoidable.

*Water and Wastewater Source Emissions*

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of water. Additional wastewater emissions include $CH_4$ and $N_2O$, although these are generated by wastewater treatment at individual wastewater treatment plants (WWTP). The project does not include any new WWTPs.

The 2017 Scoping Plan outlines objectives and goals to reduce GHGs in the water sector, including using and reusing water more efficiently through greater water conservation, drought-tolerant landscaping, stormwater capture, and water recycling. Regulations have further targeted water supply and water conservation through building and landscaping efficiency (e.g., Title 24). The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20% by December 31, 2020.

The Proposed Program would aim to further the District's water and wastewater reduction goals per the *Dream Big* initiative, CHPS criteria, and the District's Board policies and administrative regulations. District-wide goals include maximizing water conservation, including graywater and recycled water. Actions may include identifying water system anomalies, implementing central irrigation control systems that utilize water data and leak detection technology, installing artificial turf and other water-efficient landscaping, retaining pervious and vegetate areas, installing low-flow fixtures during restroom upgrades, and continuing water conservation education outreach to students, administrators, and maintenance staff (District 2014, CHPS 2014). The *Dream Big* initiative includes actions such converting whole site irrigation to recycled water to offset domestic water consumption, educating staff and students on water conservation measures, and providing incentives for schools to save water (District 2014). Other design standards include the installation of permeable pavers and bioswales, where possible, to capture and filter surface runoff within parking lots and incorporation of xeriscape principles to reduce water needs (District 2016).

Future projects under the Proposed Program would aim to implement these actions where applicable. If fully implemented, the Proposed Program would not conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan. However, if not fully implemented, the Proposed Program would conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan **(Impact-GHG-2).** Implementation of **MM-GHG-2** would reduce operational GHG emissions by reducing emissions in various sectors but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-2** would remain significant and unavoidable.

### Level of Significance Prior to Mitigation

***Construction***

The sector-by-sector analysis considers the long-term operational GHG emissions associated with the Proposed Program rather than GHG emissions associated with short-term construction-related

activities. Therefore, this analysis does not require an impact determination for construction impacts.

***Operation***

**Impact-GHG-2: Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Operation.** The Proposed Program could result in long-term greenhouse gas emissions, exceeding District-specific thresholds, where applicable. Future projects would be encouraged to implement District-wide sustainability actions per the *Dream Big* initiative, Collaborative for High Performance Schools criteria, Zero Net Energy Plan, and the District's Board policies and administrative regulations. However, while the District would aim to implement all applicable actions and design criteria, there is no guarantee that all actions and design criteria will be incorporated into the project design of all future projects or that these measures would be effective in meeting the District's efficiency thresholds. Therefore, the Proposed Program is conservatively assumed to conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan. This is a potentially significant impact.

### Mitigation Measures

For **Impact-GHG-2**:

Implement **MM-GHG-2**, as described above.

### Level of Significance After Mitigation

***Construction***

The sector-by-sector analysis considers the long-term operational GHG emissions associated with the Proposed Program rather than GHG emissions associated short-term construction-related activities. Therefore, this analysis does not require an impact determination for construction impacts.

***Operation***

Implementation of **MM-GHG-2** would reduce operational GHG emissions by reducing emissions in various sectors but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-2** would remain significant and unavoidable.

## Site-Specific Analysis

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.7-15. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the whole site modernization project category.

**Table 4.7-15. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019b.

## Impact Discussion

### Construction

Construction associated with the near-term, site-specific whole site modernization projects, would result in the temporary generation of GHG emissions that could have impacts on climate change. The same types of construction activities that would generate criteria pollutants would also generate GHG emissions (refer to Section 4.2). Emissions could originate from mobile and stationary construction equipment exhaust and employee and haul truck vehicle exhaust. Construction-related emissions would vary substantially depending on the level of activity, length of the construction period, specific construction operations, types of equipment, and number of personnel.

These near-term site-specific whole site modernization projects would occur intermittently within District boundaries throughout the course of the buildout period. As the timing and intensity of these projects are not known at this time, the precise effects of construction activities associated with these projects cannot be accurately quantified. Project details, including the scope of projects, are currently unknown because projects would be driven by District needs and other economic and planning considerations. As such, it is anticipated that in any given year, multiple near-term site-specific whole site modernization projects could be constructed within the Program area.

As noted above, there are no relevant quantitative thresholds for assessing whole site modernization projects. While the construction emission impacts associated with each project would be short-term in nature (relative to the buildout year) and limited to the period of time when construction activity is taking place for that particular project, the concurrent construction of a multitude of individual near-term site-specific whole site modernization projects that could occur at any one time would generate combined GHG emissions. Additionally, depending on the size and scale of an individual project, along with its construction schedule and other parameters, there may also be instances where the construction-related emissions generated by a single project could be substantial. For instance, near-term site-specific whole site modernization projects would require heavy equipment use for activities such as demolition, ground disturbance, and grading, and would occur over multiple years. As such, construction emissions generated by implementation of the Proposed Program are conservatively assumed to result in a potentially significant GHG impact (**Impact-GHG-1).** Implementation of **MM-AQ-2** would reduce construction-related GHG emissions from diesel-powered off-road construction equipment. Implementation of **MM-GHG-1** would reduce associated emissions from off-road construction equipment and emissions from the waste and mobile sectors. However, the associated GHG emissions reductions from **MM-GHG-1** are unknown at this time. Therefore, after mitigation, **Impact-GHG-1** would remain significant and unavoidable**.**

### Operation

Near-term whole site modernization projects would be constructed over 10 years through 2030, with operations occurring concurrently with construction. Therefore, operational GHG emissions would include overlapping construction emissions. However, as described above, a quantified analysis of potential GHG emissions during construction is not possible. Similarly, a quantified analysis of operational emissions was not completed given that the operational details associated with these projects are unknown at this time.

Near-term whole site modernization projects have the potential to result in GHG impacts from area, energy, mobile, water, and wastewater sources that exceed the District's threshold academic uses. These projects would be encouraged to implement District-wide sustainability actions per the *Dream Big* initiative, CHPS criteria, ZNE Plan, and the District's Board policies and administrative regulations, but there is no guarantee that all actions and design criteria will be incorporated into the project design of all future projects. Therefore, this is a potentially significant impact (**Impact-GHG-2).** Implementation of **MM-GHG-2** would reduce operational GHG emissions by reducing emissions in various sectors but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, after mitigation, **Impact-GHG-2** would remain significant and unavoidable.

## Level of Significance Prior to Mitigation

### Construction

**Impact-GHG-1: Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Construction.** Depending on the size and scale of an individual project, along with its construction schedule and other parameters, there may also be instances where the construction-related emissions generated by a single project could be substantial. This is a potentially significant impact.

### Operation

**Impact-GHG-2: Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Operation.** The Proposed Program could result in long-term greenhouse gas emissions, exceeding District-specific thresholds, where applicable. Future projects would be encouraged to implement District-wide sustainability actions per the *Dream Big* initiative, Collaborative for High Performance Schools criteria, Zero Net Energy Plan, and the District's Board policies and administrative regulations. However, while the District would aim to implement all applicable actions and design criteria, there is no guarantee that all actions and design criteria will be incorporated into the project design of all future projects or that these measures would be effective in meeting the District's efficiency thresholds. Therefore, the Proposed Program is conservatively assumed to conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan. This is a potentially significant impact.

## Mitigation Measures

For **Impact-GHG-1:**

Implement **MM-AQ-2**, as described in Section 4.2, and **MM-GHG-1,** as described above**.**

For **Impact-GHG-2:**

Implement **MM-GHG-2**, as described above.

## Level of Significance After Mitigation

### Construction

Implementation of **MM-AQ-2** would reduce construction-related GHG emissions from diesel-powered off-road construction equipment. Implementation of **MM-GHG-1** would reduce associated emissions from off-road construction equipment and emissions from the waste and mobile sectors. However, the associated GHG emissions reductions from **MM-GHG-1** are unknown at this time. Therefore, after mitigation, **Impact-GHG-1** would remain significant and unavoidable.

### Operation

Implementation of **MM-GHG-2** would reduce operational GHG emissions, but depending on the design features implemented, may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. This impact would remain significant and unavoidable.

***Threshold 2: Would implementation of the Proposed Program conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

# Program-Level Analysis

## All Project Categories and Proposed Program Buildout

### Impact Discussion

#### *Construction and Operation*

*2017 Scoping Plan*

The 2017 Scoping Plan builds on the programs set in place as part of the previous AB 32 Scoping Plan that was drafted to meet the 2020 reduction targets per AB 32. The 2017 Scoping Plan proposed meeting the 2030 goal by accelerating the focus on zero and near-zero emission technologies for moving freight, continued investment in renewables, greater use of low-carbon fuels including electricity and hydrogen, stronger efforts to reduce emissions of short-lived climate pollutants ($CH_4$ and fluorinated gases), further efforts to create walkable communities with expanded mass transit and other alternatives to traveling by car, continuing the cap-and-trade program, and ensuring that natural lands become carbon sinks to provide additional emissions reductions and flexibility in meeting the target (CARB 2017b).

In general, the Proposed Program (all project categories) is built around the concept of sustainability. This is manifested through increased incorporation of green-building principles, including an emphasis on energy efficiency, water conservation, and waste reduction. Although the measures included in the 2017 Scoping Plan are necessarily broad, the Proposed Program is generally consistent with the goals and desired outcomes of the plan (i.e., increasing energy efficiency, water conservation, waste diversion, transportation sustainability.). The consistency of the Proposed Program with the policies in the 2017 Scoping Plan is analyzed in Table 4.7-16.

**Table 4.7-16. Proposed Program Consistency with 2017 Scoping Plan Policies**

| Policy | Primary Objective | Proposed Program Consistency Analysis |
|---|---|---|
| SB 350 | Reduce GHG emissions in the electricity sector through the implementation of the 50% RPS, doubling of energy savings, and other actions as appropriate to achieve GHG emissions reductions planning targets in the Integrated Resource Plan process. | This policy is a state program that requires no action at the local or project level. Nonetheless, the Proposed Program would be consistent with the energy saving objective of this measure. The Proposed Program would promote going off-grid with solar to support the District's goal to be net zero energy or a 90% offset goal, by 2030, and increase LED lighting throughout the District to enhance energy efficiency (where applicable). Additionally, the District's AR 3511 provides energy conservation operating guidelines for a school site's lighting, HVAC systems, water heaters, and electrical equipment and appliances. Some strategies include setting specific heating and cooling points for summer and winter months. Lighting shall be turned off once all students and |

| Policy | Primary Objective | Proposed Program Consistency Analysis |
|---|---|---|
| | | staff have left a school facility, and all outside lighting shall be off during daytime hours. |
| Low Carbon Fuel Standard | Transition to cleaner/less-polluting fuels that have a lower carbon footprint. | This policy is a state program that requires no action at the local or project level. Nonetheless, school improvements would aim to increase enrollment of students at their neighborhood schools and support reductions in vehicle travel. As noted in Threshold 1, the Proposed Program would result in a per student VMT reduction for academic facilities. |
| Mobile Source Strategy (Cleaner Technology and Fuels [CTF] Scenario) | Reduce GHGs and other pollutants from the transportation sector through transition to zero-emission and low-emission vehicles, cleaner transit systems and reduction of VMT. | This policy is a state program that requires no action at the local or project level. Nonetheless, District improvements under the Proposed Program would support the reduction of VMT. As noted in Threshold 1, the Proposed Program would result in a per student VMT reduction for academic facilities. |
| SB 1383 | Approve and Implement Short-Lived Climate Pollutant strategy to reduce highly potent GHGs. | This policy is a state program that requires no action at the local or project level, and is not directly applicable to the Proposed Program. |
| California Sustainable Freight Action Plan | Improve freight efficiency, transition to zero-emission technologies, and increase competitiveness of California's freight system. | This policy is a state program that requires no action at the local or project level, and is not directly applicable to the Proposed Program. |
| Post-2020 Cap and-Trade Program | Reduce GHGs across largest GHG emissions sources. | This policy is a state program that requires no action at the local or project level, and is not directly applicable to the Proposed Program. |

While the Proposed Program is consistent with the broad policy objectives of the 2017 Scoping Plan, increases in student enrollment at existing schools (e.g., whole site modernization) and joint-use facilities could generate emissions beyond the $MTCO_2e$ per student threshold (see Table 4.7-13) and $MTCO_2e$ per acre threshold (see Table 4.7-14), which was derived from the state's 2030 GHG reduction target.

*City of San Diego Climate Action Plan*

As discussed in Section 4.7.3, the City of San Diego has adopted a CAP. School uses are not specifically referenced or quantified, but per capita assumptions used by the CAP to develop GHG emissions goals presumably do assume existing and future student enrollment. The following consistency analysis is provided for the Proposed Program. Table 4.7-17 categorizes each CAP measure by what emission source it targets and then describes how the Proposed Program, and/or the Proposed Program's compliance with applicable regulations and implementation of program-specific mitigation measures, would result in project consistency with the CAP measures. The Proposed Program is broadly consistent with the goals and actions of the CAP.

**Table 4.7-17. Proposed Program Consistency with City of San Diego Climate Action Plan**

| Goal | Action | Program Consistency Analysis |
|---|---|---|
| **Energy** | | |
| Reduce residential and municipal building energy consumption | Implement a residential Energy Conservation and Disclosure Ordinance and Municipal Energy Strategy and Implementation Plan | This is a citywide goal that requires no action at the project level. Nonetheless, District improvements would support the District's goal of being net zero energy by 2030 and include onsite renewable solar, LED lighting, and energy management systems (where applicable), which would be consistent with this CAP goal. |
| **Water** | | |
| Reduce daily per capita consumption | Support water rate structures that provide pricing signals that encourage water conservation and reuse, and implement a Water Conservation and Disclosure Ordinance and Outdoor Landscaping Ordinance | This is a citywide goal that requires no action at the project level. Nonetheless, District improvements would support reductions in water use through projects such as low-flow fixtures during restroom upgrades, installing artificial turf and other water-efficient landscaping, and continuing water conservation education outreach to students, administrators, and maintenance staff. |
| Achieve 100% renewable energy by 2035 | Add additional renewable electricity supply | This is a citywide goal that requires no action at the project level. Nonetheless, District improvements would support the District's goal of being net zero energy by 2030 and include onsite renewable solar (where applicable), which would be consistent with this CAP goal. |
| Increase municipal zero emissions vehicles | Increase the number of zero emissions vehicles in the municipal fleet by 90% by 2025. | This is a citywide goal that requires no action at the project level. Nonetheless, District improvements would not preclude zero emission vehicles. |
| Convert existing diesel municipal solid waste collection trucks to compressed natural gas or other alternative low emission fuels | Achieve 100% conversion from diesel fuel used by municipal solid waste collection to compressed natural or other alternative low emission fuels by 2035. | This is a citywide goal that requires no action at the project level. Nonetheless, District improvements would not preclude the conversion of solid waste collection trucks to an alternative low emission fuel. |
| **Transportation** | | |
| Increase the use of mass transit | Implement the General Plan's Mobility Plan Element and the City of Villages Strategy to achieve mass transit mode share of 25% by 2035 in Transit Priority Areas | This is a citywide goal that requires no action at the project level. Nonetheless, District improvements would result in students returning to or enrolling in their assigned District school, thereby traveling reduced distances and increasing opportunities for the use of mass transit. This would be consistent with this CAP goal. |

| Goal | Action | Program Consistency Analysis |
|---|---|---|
| Increase commuter walking opportunities | Implement pedestrian improvements in Transit Priority Areas to achieve a walking commuter mode share of 7% by 2035 | This is a citywide goal that requires no action at the project level. Nonetheless, District improvements would result in students returning to or enrolling in their assigned District school, thereby traveling reduced distances and increasing walking opportunities. This would be consistent with this CAP goal. |
| Increase commuter bicycling opportunities | Implement the City's Bicycle Master Plan to increase commuter bicycling opportunities to achieve an 18% mode share by 2035 in Transit Priority Areas | This is a citywide goal that requires no action at the project level. Nonetheless, District improvements would result in students returning to or enrolling in their assigned District school, thereby traveling reduced distances and increasing bicycling opportunities. This would be consistent with this CAP goal. |
| Reduce vehicle fuel consumption | Implement a Traffic Signal Master Plan and implement a Roundabouts Mater Plan | This is a citywide goal that requires no action at the project level. Nonetheless, District improvements under the Proposed Program would support VMT reduction, and, consequently, reduce vehicle fuel consumption for academic facilities. This would be consistent with this CAP goal. |
| Promote effective land use to reduce vehicle miles traveled | Implement transit-oriented development within Transit Priority Areas to reduce average vehicle commute distances | This is a citywide goal that requires no action at the project level. Nonetheless, District improvements under the Proposed Program would support the reduction of VMT. As noted above, the Proposed Program would result in a per student VMT reduction for academic facilities. This would be consistent with this CAP goal. |
| **Waste** | | |
| Divert solid waste and capture landfill methane gas emissions | Enact the City's Zero Waste Plan and implement landfill gas collection operational procedures in compliance with CARB's Landfill Methane Capture regulations | This is a citywide goal that requires no action at the project level. Nonetheless, District improvements would be consistent with the District's goals for waste reduction. Future projects under the Proposed Program would be required to meet the District's construction and demolition diversion requirements, which consist of metal and mixed material recycling. Additionally, future projects would be required to comply with recycling food waste from school kitchens per AB 1826. New facilities would meet the District's waste, recycling, and composting goals. This would be consistent with this CAP goal. |
| **Climate Resiliency** | | |
| Increase urban tree coverage | Present to City Council for consideration a citywide Urban Tree Planting Program. The program shall include water conservation measures to minimize the water use for tree plantings. The measures should include planting drought-tolerant and native trees, and | This is a citywide goal that requires no action at the project level. Nonetheless, District improvements would plant native and low water usage plants where applicable. This would be consistent with this CAP goal. |

| Goal | Action | Program Consistency Analysis |
|---|---|---|
| | prioritizing tree plantings in areas with recycled water and greywater infrastructure. Develop a regional urban tree canopy assessment, complete the Urban Forest Management Plan, prepare a Parks Master Plan, hire an urban forest program manager, and plan for long term maintenance of additional trees. | |

*District Environmental Sustainability Goals*

The District has acknowledged a number of opportunities to address environmental sustainability in ways that have a positive impact on student education, the District budget, and the whole San Diego community. While the District has not adopted a plan to reduce GHG emissions, it has expressed its intent to develop a plan to reduce GHG emissions, while incorporating sustainable design and renewable energy into site design. As described above under Threshold 1, the Proposed Program would implement, when applicable, various actions that would be consistent with its *Dream Big* initiatives and design guide, CHPS criteria, ZNE Plan, and the District's Board policies and administrative regulations.

*Executive Order EO S-3-05/B-55-18 GHG Reduction Goals*

There are several studies that discuss potential mechanisms for meeting California's long-term decarbonization goals. For instance, the CEC commissioned a study to evaluate mitigation options and costs for achieving an 80% reduction in GHG emissions by 2050, relative to 1990 levels (Mahone et al. 2018). Other recent studies have been published by C2ES and the Energy Future Initiative (Lempert et al. 2019, Energy Futures Initiative 2019). In general, these studies reach similar conclusions. Deep reductions in GHG emissions can be achieved only with significant changes in electricity production, transportation fuels, and industrial processes (e.g., decarbonizing electricity production, electrifying transportation, implementing widespread adoption of low-carbon or no-carbon transportation fuels, electrifying non-transportation direct fuel uses, increasing energy efficiency, avoiding waste emissions, increasing carbon sequestration, and replacing high global warming potential gases). For example, the C2ES report notes that "achieving climate neutrality requires a broad array of social, economic, and technological transformations—in essence, reinventing the ways we power our homes and economies, move people and goods from place to place, and manage our lands" (Lempert et al. 2019).

The systemic changes needed to achieve the state's long-term GHG reduction goals, if legislatively adopted, will require significant policy, technical, and economic solutions. Decarbonization of the transportation fuel supply will require electric and plug-in hybrid electric vehicles to make up most light-duty vehicles. Some changes, such as the use of biofuels to replace petroleum for aviation, cannot be accomplished without action by the federal government. Furthermore, achieving the long-term GHG reduction goals will require California to dramatically increase the amount of electricity that is generated by renewable generation sources and, correspondingly, advance the deployment of energy storage technology and smart-grid strategies, such as price-responsive demand and the smart charging of vehicles. This would entail a significant redesign of California's electricity system.

In qualitatively evaluating the Proposed Program's emissions for consistency with EO S-03-05/B-55-18, it is important to note that some of these broad-scale shifts in how energy is produced and used are outside of the control of the project. The changes necessitated by the state's long-term climate policy will require additional policy and regulatory changes, which are unknown at this time. Therefore, the extent to which the project's emissions and resulting impacts would be mitigated through implementation of such changes is not known and cannot be known at this time. Furthermore, implementation of such additional policy and regulatory changes is in the jurisdiction of state-level agencies (e.g., CARB), not the District's. However, some of these measures (e.g., decarbonization, energy efficiency, and reduced fossil-fuel-based VMT) can be facilitated, at least to some extent, through implementation of specific GHG reduction measures. Under this same rationale, if the Proposed Program did not implement measures to maximize energy efficiency or utilize renewable energy, the reductions may not be enough for an individual project to meet the aggressive long-term cumulative reduction goals.

*Other State Regulations*

As discussed above in the analysis of consistency with SB 32 and EO S-3-05/B-55-18, systemic changes will be required at the state level to achieve the statewide future GHG reduction goals. Regulations—such as the SB 100-mandated 100% carbon-free RPS by 2045; implementation of the state's SLCP Reduction Strategy, including forthcoming regulations for composting and organics diversion; and future updates to the state's Title 24 standards (including requirements for net zero energy buildings)—will be necessary to attain the magnitude of reductions required for the state's goals. The Proposed Program would be required to comply with these regulations in new construction (in the case of updated Title 24 standards) or would be directly affected by the outcomes (e.g., energy consumption would be less carbon intensive due to the increasingly stringent RPSs). Unlike the scoping plans, which explicitly call for additional emissions reductions from local governments and new projects, none of these state regulations identify specific requirements or commitments for new development beyond what is already required by existing regulations, or will be required in forthcoming regulation. Thus, for the foreseeable future, the Proposed Program would not conflict with any other state-level regulations pertaining to GHGs in the post-2020 era.

*Summary*

The Proposed Program would be consistent with state regulations and the City's CAP that will reduce GHG emissions (e.g., SB 100, SLCP Reduction Strategy). However, while District policies are consistent with anticipated long-term statewide strategies to reduce GHG emissions, they may not be adequate on their own to reduce project-level emissions consistent with the levels required to comply with the 2017 Scoping Plan and meet the state's long-term climate change goals in EO S-3-05/B-55-18. It is possible that future adopted state and federal actions would reduce project emissions below a level consistent with the reduction targets in the EO, but this cannot be known at this time; thus, it is conservatively assumed that the project's emission levels would be inconsistent with the goals in EO B-55-18/S-3-05. Therefore, implementation of the Proposed Program would result in a potentially significant impact (**Impact-GHG-3**). Implementation of **MM-GHG-1** and **MM-GHG-2** would be consistent with anticipated long-term statewide strategies to reduce GHG emissions during construction and operation. However, these measures may not be adequate on their own to reduce project-level emissions during operation consistent with the levels required to comply with the 2017 Scoping Plan depending on the strategies implemented, particularly within the building energy and water sectors generated by new schools and non-school uses under the

Proposed Program, and meet the state's long-time climate change goals in EO S-3-05/B-55-18. Therefore, **Impact-GHG-3** would remain significant and unavoidable.

#### Level of Significance Prior to Mitigation

***Construction and Operation***

**Impact-GHG-3: Potential to Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases.** The Proposed Program could result in construction and long-term operational greenhouse emissions. Future projects would aim to implement District-wide sustainability actions per its *Dream Big* initiative and design guide, Collaborative for High Performance Schools criteria, Zero Net Energy Plan, and the District's Board policies and administrative regulations. However, while the District would aim to implement all applicable actions and design criteria, there is no guarantee that all actions and design criteria will be incorporated into the project design of all future projects. Therefore, it is conservatively assumed that the Proposed Program's emission levels would be inconsistent with the goals in Executive Order B-55-18/S-3-05. This is a potentially significant impact.

#### Mitigation Measures

For **Impact-GHG-3:**

Implement **MM-GHG-1** and **MM-GHG-2**, as described above.

#### Level of Significance After Mitigation

***Construction and Operation***

Implementation of **MM-GHG-1** and **MM-GHG-2** would be consistent with anticipated long-term statewide strategies to reduce GHG emissions during construction and operation. However, these measures may not be adequate on their own to reduce project-level emissions during operation consistent with the levels required to comply with the 2017 Scoping Plan depending on the strategies implemented, particularly within the building energy and water sectors generated by new schools and non-school uses under the Proposed Program, and meet the state's long-time climate change goals in EO S-3-05/B-55-18. Therefore, **Impact-GHG-3** would remain significant and unavoidable.

## Site-Specific Analysis

### Impact Discussion

As described above, the Proposed Program, including whole site modernization projects, would be consistent with state regulations and the City's CAP that will reduce GHG emissions (e.g., SB 100, SLCP Reduction Strategy). However, while District policies are consistent with anticipated long-term statewide strategies to reduce GHG emissions, they may not be adequate on their own to reduce project-level emissions consistent with the levels required to comply with the 2017 Scoping Plan and meet the state's long-term climate change goals in EO S-3-05/B-55-18. It is possible that future adopted state and federal actions would reduce project emissions below a level consistent with the reduction targets in the EO, but this cannot be known at this time; thus, it is conservatively assumed that the projects' emission levels would be inconsistent with the goals in EO B-55-18/S-3-05. Therefore, implementation of the near-term site-specific whole-site modernization projects would

result in a potentially significant impact (**Impact-GHG-3**). Implementation of **MM-GHG-1** and **MM-GHG-2** would be consistent with anticipated long-term statewide strategies to reduce GHG emissions during construction and operation. However, these measures may not be adequate on their own to reduce project-level emissions during operation consistent with the levels required to comply with the 2017 Scoping Plan depending on the strategies implemented, particularly within the building energy and water sectors generated by new schools and non-school uses under the Proposed Program, and meet the state's long-time climate change goals in EO S-3-05/B-55-18. Therefore, **Impact-GHG-3** would remain significant and unavoidable.

## Level of Significance Prior to Mitigation

### Construction and Operation

**Impact-GHG-3: Potential to Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases.** The Proposed Program could result in construction and long-term operational greenhouse gas emissions. Future project would aim to implement District-wide sustainability actions per its *Dream Big* initiative and design guide, Collaborative for High Performance Schools criteria, Zero Net Energy Plan, and the District's Board policies and administrative regulations. However, while the District would aim to implement all applicable actions and design criteria, there is no guarantee that all actions and design criteria will be incorporated into the project design of all future projects. Therefore, it is conservatively assumed that the Proposed Program's emission levels would be inconsistent with the goals in Executive Order B-55-18/S-3-05. This is a potentially significant impact.

## Mitigation Measures

For **Impact-GHG-3:**

Implement **MM-GHG-1** and **MM-GHG-2**, as described above.

## Level of Significance After Mitigation

### Construction and Operation

Implementation of **MM-GHG-1** and **MM-GHG-2** would be consistent with anticipated long-term statewide strategies to reduce GHG emissions during construction and operation. However, these measures may not be adequate on their own to reduce project-level emissions during operation consistent with the levels required to comply with the 2017 Scoping Plan depending on the strategies implemented, particularly within the building energy and water sectors generated by new schools and non-school uses under the Proposed Program, and meet the state's long-time climate change goals in EO S-3-05/B-55-18. Therefore, **Impact-GHG-3** would remain significant and unavoidable.

# Section 4.8
# Hazards and Hazardous Materials

## 4.8.1 Overview

This section describes the existing conditions and applicable laws and regulations for hazardous conditions and hazardous materials, followed by an analysis of the Proposed Program's potential to: (1) 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; (2) be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment; and (3) be located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard or excessive noise for people residing or working in the project area.

Table 4.8-1 summarizes the significant impacts and mitigation measures (MMs) discussed in Section 4.8.4.3, *Impacts and Mitigation Measures.*

**Table 4.8-1. Summary of Significant Hazards and Hazardous Materials Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact-HAZ-1:** Encounter Hazardous Materials During Construction at New Acquisition Sites. | **MM-HAZ-1:** Conduct an Environmental Site Assessment. | Less than Significant | Mitigation requires preparation of an Environmental Site Assessment (ESA). If the Phase I ESA or the Phase II ESA/ Preliminary Environmental Assessment (PEA) indicate potential sites of environmental concern are present on the project site, MM-HAZ-3 through MM-HAZ-7 (see below) shall then be implemented as appropriate; or if the Department of Toxic Substances Control (DTSC) requires additional remedial documentation and/or |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | action beyond the scope of MM-HAZ-3 through MM-HAZ-7, such as a Remedial Action Work Plan/Remedial Action Plan. |
| **Impact-HAZ-2**: Encounter Contamination or Munitions on Sites Listed as Formerly Used Defense Sites. | **MM-HAZ-2**: Prepare a Munitions Response Plan for New District Sites. | Less than Significant | Mitigation requires preparation of a Munitions Response Plan (MRP), which will include procedures in the event unexploded ordinance (UXO) is discovered during construction, as well as awareness briefings for contractors so that they are trained in the procedures. |
| **Impact-HAZ-7:** Interfere with Federal Aviation Administration Communication. | **MM-HAZ-9.** Ensure Federal Aviation Administration Notification of Proposed Construction or Alteration. | Less than Significant | The District would be required to submit an application for a project that could introduce new or higher buildings or construction equipment into an airport's navigation space for the review and approval of the Federal Aviation Administration (FAA). |
| **Impact-HAZ-8:** Conflict with Regulations Applicable to Review Area 1. | **MM-HAZ-10.** Ensure Airport Land Use Commission Review and Approval for Review Area 1. | Less than Significant | To ensure future projects that are located within the overlay for Review Area 1 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the Airport Land Use Commission (ALUC) for review and approval. |
| **Impact-HAZ-9:** Conflict with Regulations | **MM-HAZ-11**. Ensure Airport Land Use | Less than Significant | To ensure future projects that are |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| Applicable to Review Area 2. | Commission Review and Approval for Review Area 2. | | located within the overlay for Review Area 2 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval. |
| **Whole Site Modernization** | | | |
| **Impact-HAZ-3**: Encounter Hazardous Materials During Ground-Disturbing Activities. | **MM-HAZ-3**: Prepare a Site Screening Memorandum.<br>**MM-HAZ-4**: Prepare a Site Characterization Report (if determined necessary by **MM-HAZ-3.**<br>**MM-HAZ-5**: Prepare a Soil Management Plan (if determined necessary by **MM-HAZ-3.**<br>**MM-HAZ-6:** Prepare a Project-Specific Worker Health and Safety Plan (if determined necessary by **MM-HAZ-3.**<br>**MM-HAZ-7:** Prepare a Community Health and Safety Plan (if determined necessary by **MM-HAZ-3.**<br>**MM-HAZ-2**: Prepare a Munitions Response Plan for New District Sites. (if determined necessary by **MM-HAZ-3**). | Less than Significant | In order to address the presence of known or suspected onsite contamination listed in Table 4.8-2, a Site Screening Memorandum will be conducted for future projects. The Site Screening Memorandum will provide a review of readily available documentation, will indicate the presence and extent of contamination, and will indicate additional studies or plans that are needed, if any. |
| **Impact-HAZ-4:** Encounter Lead or Organochlorine Pesticides in Soil During Construction. | **MM-HAZ-3**: Prepare a Site Screening Memorandum.<br>**MM-HAZ-4**: Prepare a Site Characterization Report (if determined | | In order to address the presence of lead- or pesticide-contaminated soil due to historic land uses on an existing site, a Site Screening Memorandum will be conducted for future |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | necessary by **MM-HAZ-3**).<br>**MM-HAZ-5**: Prepare a Soil Management Plan (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-6:** Prepare a Project-Specific Worker Health and Safety Plan (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-7:** Prepare a Community Health and Safety Plan (if determined necessary by **MM-HAZ-3**). | | projects. The Site Screening Memorandum will provide a review of readily available documentation, will indicate the presence and extent of contamination, and will indicate additional studies or plans that are needed, if any. |
| **Impact-HAZ-5:** Encounter Contamination or Munitions on Sites Listed as Formerly Used Defense Sites. | **MM-HAZ-8**: Prepare a Munitions Response Plan for Existing District Sites. | Less than Significant | If ground-disturbing activities are proposed within any of the 14 schools located within the known Formerly Used Defense Sites (FUDS) identified in Table 4.8-3, the District will prepare and implement an MRP, which will include procedures in the event UXO is discovered during construction, as well as awareness briefings for contractors so that they are trained in the procedures. |
| **Impact-HAZ-7:** Interfere with Federal Aviation Administration Communication. | **MM-HAZ-9.** Ensure Federal Aviation Administration Notification of Proposed Construction or Alteration. | Less than Significant | The District would be required to submit an application for a project that could introduce new or higher buildings or construction equipment into an airport's navigation space for the review and approval of the FAA. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-HAZ-8:** Conflict with Regulations Applicable to Review Area 1. | **MM-HAZ-10.** Ensure Airport Land Use Commission Review and Approval for Review Area 1. | Less than Significant | To ensure future projects that are located within the overlay for Review Area 1 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval. |
| **Impact-HAZ-9:** Conflict with Regulations Applicable to Review Area 2. | **MM-HAZ-11**. Ensure Airport Land Use Commission Review and Approval for Review Area 2. | | To ensure future projects that are located within the overlay for Review Area 2 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval. |
| **Upgrades of Existing School and Administrative Sites** | | | |
| **Impact-HAZ-3**: Encounter Hazardous Materials During Ground-Disturbing Activities. | **MM-HAZ-3**: Prepare a Site Screening Memorandum (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-4**: Prepare a Site Characterization Report (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-5**: Prepare a Soil Management Plan (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-6:** Prepare a Project-Specific Worker Health and Safety Plan (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-7:** Prepare a Community Health and Safety Plan (if | Less than Significant | In order to address the presence of known or suspected onsite contamination listed in Table 4.8-2, a Site Screening Memorandum will be conducted for future projects. The Site Screening Memorandum will provide a review of readily available documentation, will indicate the presence and extent of contamination, and will indicate additional studies or plans that are needed, if any. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | determined necessary by **MM-HAZ-3**). | | |
| **Impact-HAZ-4:** Encounter Lead or Organochlorine Pesticides in Soil During Construction. | **MM-HAZ-3**: Prepare a Site Screening Memorandum.<br>**MM-HAZ-4**: Prepare a Site Characterization Report (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-5**: Prepare a Soil Management Plan (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-6:** Prepare a Project-Specific Worker Health and Safety Plan (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-7:** Prepare a Community Health and Safety Plan (if determined necessary by **MM-HAZ-3**). | | In order to address the presence of lead- or pesticide-contaminated soil due to historic land uses on an existing, a Site Screening Memorandum will be conducted for future projects. The Site Screening Memorandum will provide a review of readily available documentation, will indicate the presence and extent of contamination, and will indicate additional studies or plans that are needed, if any. |
| **Impact-HAZ-5:** Encounter Contamination or Munitions on Sites Listed as Formerly Used Defense Sites. | **MM-HAZ-8**: Prepare a Munitions Response Plan for Existing District Sites. | Less than Significant | If ground-disturbing activities are proposed within any of the 14 schools located within the known FUDS identified in Table 4.8-3, the District will prepare and implement a Munitions Response Plan, which will include procedures in the event UXO is discovered during construction, as well as awareness briefings for contractors so that they are trained in the procedures. |
| **Impact-HAZ-7:** Interfere with Federal Aviation Administration Communication. | **MM-HAZ-9.** Ensure Federal Aviation Administration Notification of | Less than Significant | The District would be required to submit an application for a project that could introduce new or |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | Proposed Construction or Alteration. | | higher buildings or construction equipment into an airport's navigation space for the review and approval of the FAA. |
| **Impact-HAZ-8:** Conflict with Regulations Applicable to Review Area 1. | **MM-HAZ-10.** Ensure Airport Land Use Commission Review and Approval for Review Area 1. | Less than Significant | To ensure future projects that are located within the overlay for Review Area 1 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval. |
| **Impact-HAZ-9:** Conflict with Regulations Applicable to Review Area 2. | **MM-HAZ-11**. Ensure Airport Land Use Commission Review and Approval for Review Area 2. | | To ensure future projects that are located within the overlay for Review Area 2 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval. |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| **Impact-HAZ-3**: Encounter Hazardous Materials During Ground-Disturbing Activities. | **MM-HAZ-3**: Prepare a Site Screening Memorandum (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-4**: Prepare a Site Characterization Report (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-5**: Prepare a Soil Management Plan (if determined necessary by **MM-HAZ-3**). | Less than Significant | In order to address the presence of known or suspected onsite contamination listed in Table 4.8-2, a Site Screening Memorandum will be conducted for future projects. The Site Screening Memorandum will provide a review of readily available documentation, will indicate the presence and extent of contamination, and will |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | **MM-HAZ-6:** Prepare a Project-Specific Worker Health and Safety Plan (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-7:** Prepare a Community Health and Safety Plan (if determined necessary by **MM-HAZ-3**). | | indicate additional studies or plans that are needed, if any. |
| **Impact-HAZ-4:** Encounter Lead or Organochlorine Pesticides in Soil During Construction. | **MM-HAZ-3**: Prepare a Site Screening Memorandum (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-4**: Prepare a Site Characterization Report (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-5**: Prepare a Soil Management Plan (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-6:** Prepare a Project-Specific Worker Health and Safety Plan (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-7:** Prepare a Community Health and Safety Plan (if determined necessary by **MM-HAZ-3**). | | In order to address the presence of lead- or pesticide-contaminated soil due to historic land uses on an existing, a Site Screening Memorandum will be conducted for future projects. The Site Screening Memorandum will provide a review of readily available documentation, will indicate the presence and extent of contamination, and will indicate additional studies or plans that are needed, if any. |
| **Impact-HAZ-5:** Encounter Contamination or Munitions on Sites Listed as Formerly Used Defense Sites. | **MM-HAZ-8**: Prepare a Munitions Response Plan for Existing District Sites. | Less than Significant | If ground-disturbing activities are proposed within any of the 14 schools located within the known FUDS identified in Table 4.8-3, the District will prepare and implement a Munitions Response Plan, which will include procedures in the event UXO is |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | discovered during construction, as well as awareness briefings for contractors so that they are trained in the procedures. |
| **Impact-HAZ-7:** Interfere with Federal Aviation Administration Communication. | **MM-HAZ-9.** Ensure Federal Aviation Administration Notification of Proposed Construction or Alteration. | Less than Significant | The District would be required to submit an application for a project that could introduce new or higher buildings or construction equipment into an airport's navigation space for the review and approval of the FAA. |
| **Impact-HAZ-8:** Conflict with Regulations Applicable to Review Area 1. | **MM-HAZ-10.** Ensure Airport Land Use Commission Review and Approval for Review Area 1. | Less than Significant | To ensure future projects that are located within the overlay for Review Area 1 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval. |
| **Impact-HAZ-9:** Conflict with Regulations Applicable to Review Area 2. | **MM-HAZ-11**. Ensure Airport Land Use Commission Review and Approval for Review Area 2. | | To ensure future projects that are located within the overlay for Review Area 2 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval. |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| **Impact-HAZ-3**: Encounter Hazardous Materials During Ground-Disturbing Activities. | **MM-HAZ-3**: Prepare a Site Screening Memorandum.<br>**MM-HAZ-4**: Prepare a Site Characterization | Less than Significant | A Site Screening Memorandum will provide a review of readily available documentation, will |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | Report (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-5**: Prepare a Soil Management Plan (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-6:** Prepare a Project-Specific Worker Health and Safety Plan (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-7:** Prepare a Community Health and Safety Plan (if determined necessary by **MM-HAZ-3**). | | indicate the presence and extent of contamination, and will indicate additional studies or plans that are needed, if any. |
| **Impact-HAZ-4:** Encounter Lead or Organochlorine Pesticides in Soil During Construction. | **MM-HAZ-3**: Prepare a Site Screening Memorandum.<br>**MM-HAZ-4**: Prepare a Site Characterization Report (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-5**: Prepare a Soil Management Plan (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-6:** Prepare a Project-Specific Worker Health and Safety Plan (if determined necessary by **MM-HAZ-3**).<br>**MM-HAZ-7:** Prepare a Community Health and Safety Plan (if determined necessary by **MM-HAZ-3**). | Less than Significant | A Site Screening Memorandum will be conducted for future projects. The Site Screening Memorandum will provide a review of readily available documentation, will indicate the presence and extent of contamination, and will indicate additional studies or plans that are needed, if any. |
| **Impact-HAZ-6**: Encounter Contamination or Munitions at Madison High School During Ground-Disturbing Activities. | **MM-HAZ-8**: Prepare a Munitions Response Plan for Existing District Sites. | Less than Significant | Implementation of a Munitions Response Plan will include procedures in the event UXO is discovered during |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | construction, as well as awareness briefings for contractors so that they are trained in the procedures. |
| **Impact-HAZ-7:** Interfere with Federal Aviation Administration Communication. | **MM-HAZ-9.** Ensure Federal Aviation Administration Notification of Proposed Construction or Alteration. | Less than Significant | The District would be required to submit an application for a project that could introduce new or higher buildings or construction equipment into an airport's navigation space for the review and approval of the FAA. |
| **Impact-HAZ-8:** Conflict with Regulations Applicable to Review Area 1. | **MM-HAZ-10.** Ensure Airport Land Use Commission Review and Approval for Review Area 1. | Less than Significant | To ensure future projects that are located within the overlay for Review Area 1 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval. |
| **Impact-HAZ-9:** Conflict with Regulations Applicable to Review Area 2. | **MM-HAZ-11**. Ensure Airport Land Use Commission Review and Approval for Review Area 2. | | To ensure future projects that are located within the overlay for Review Area 2 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval. |

# 4.8.2 Existing Conditions

The following describes the existing hazard and hazardous materials conditions at existing school sites or administrative facilities within the District.

## 4.8.2.1 Known Contamination at District Sites

### District Sites with Database Listings

The *Environmental Conditions/Hazards Programmatic Environmental Impact Report* (Environmental Hazards Report), prepared by Ninyo & Moore Geotechnical & Environmental Sciences Consultants (Ninyo & Moore) for the District, dated August 9, 2019, summarizes existing environmental conditions and potential environmental concerns at District-owned facilities (Appendix H). The Environmental Hazards Report was developed using readily available reports, documents, and sources, including an environmental database search performed using Environmental Data Resources (EDR), the State Water Resources Control Board (SWRCB) GeoTracker website, and the California Department of Toxic Substances Control (DTSC) Envirostor website. The database searches were conducted using a search radius of 1/8$^{th}$ mile around 210 District-owned sites. Of the 210 sites, 198 were listed on one or more environmental databases. Based on a review of the available information for each site, Ninyo & Moore evaluated the sites with database listings for potential impacts on soil, groundwater, or soil vapor at the site. Ninyo & Moore determined 52 of the 198 sites were of potential environmental concern. Table 4.8-2 describes these sites, arranged by cluster. A more detailed explanation of each potential environmental concern associated with hazardous sites is included in the Environmental Hazards Report (Appendix H).

**Table 4.8-2. School Sites and District Facilities with Potential Environmental Concern**

| Facility Name/Address | Items of Potential Concern |
|---|---|
| **Clairemont Cluster** | |
| Clairemont HS, 4150 Ute Drive | • 6,000-gallon diesel underground storage tank (UST), removed 1968.<br>• Concrete waste oil sump installed in 1958.<br>• California Department of Resources Recycling and Recovery (CalRecycle) solid waste disposal site, Facility ID No. 37-CR-0015, based on the presence of buried burned waste.<br>• DTSC school cleanup site, Site Code 404864, associated with the presence of burned waste.<br>• A specific Preliminary Environmental Assessment (PEA) for burned waste found in the parking lot was approved by DTSC in August 2015.<br>• Parking Lot Remedial Action Workplan (RAW) was approved by DTSC in December 2016.<br>• Remedial action was performed in September 2019. |
| **Crawford Cluster** | |
| Crawford HS, 4191 Colts Way | • Unauthorized release (H14074-001) of heating/fuel oil or diesel from a UST removed in 1988 resulted in impacts on soil that were reported to have been excavated and removed from the site; case closed in 2000.<br>• Possible 9,000-gallon waste oil UST/sump with piping, reportedly installed 1958. |

| Facility Name/Address | Items of Potential Concern |
|---|---|
| Fay Elementary School (ES) 4080 52nd Street | • Disposal of 16.85 tons of "contaminated soil from site cleanup" in 2005. |
| Ibarra ES, 4877 Orange Avenue | • Disposal of "contaminated soil from site cleanup" in 2003 (8.42 tons) and 2004 (182.04 tons). |
| Iftin K–8, 5465 El Cajon Boulevard | • Unauthorized release (H21219-001) associated with piping that resulted in impacts on soil; case closed in 1986.<br>• 2,000-gallon diesel UST removed in 1987. |
| Mann Middle School (MS), 4245 54th Street | • 2,000-gallon diesel UST removed in 1997. |
| **Henry Cluster** | |
| Patrick Henry HS, 6702 Wandermere Drive | • Possible 9,000-gallon waste oil UST installed in 1969.<br>• 10,000-gallon diesel UST removed in 1988.<br>• Unauthorized release (H13250-002) of fuel from a former gasoline station adjacent to the site that has impacted soil, groundwater, and soil vapor on the site; case opened in 2002. |
| Lewis MS, 5170 Greenbrier Avenue | • Unauthorized release(H17104-001) associated with a failed tank-integrity test; case closed in 1987.<br>• 6,000-gallon diesel UST removed in 1988. |
| **Hoover Cluster** | |
| Adams ES, 4672 35th Street | • Unauthorized release (H29979-001) associated with a 550-gallon boiler fuel UST removed in 1990; case closed in 1991. |
| Central ES, 4063 Polk Avenue | • Unauthorized release (H22865-001) of heating oil/fuel oil from a 1,000-gallon UST, removed in 1992, that resulted in impacts on soil; case closed in 2001.<br>• 2,000-gallon gasoline/waste oil UST removed in 1992. |
| Edison ES, 4077 35th Street | • Unauthorized release (H29585-001) of heating/fuel oil from a 2,000-gallon UST, removed in 1989, that resulted in impacts on soil; case closed in 1990.<br>• Disposal of 15.17 tons of "contaminated soil from site cleanup" in 2003. |
| Health Sciences HS and MS, 3910 University Avenue | • Multiple listings of historical gas stations, USTs, and dry cleaners on site.<br>• Unauthorized release (H05823-001) of waste oil from a 500-gallon UST, removed in 1993, that resulted in impacts on soil; case closed in 1995.<br>• Unauthorized release (H05823-002) of gasoline that resulted in impacts on soil; case closed in 1996.<br>• Disposal of "contaminated soil from site cleanup" in 2002 (121.36 tons) and 2003 (6.5 tons). |
| Hoover MS, 4474 El Cajon Boulevard | • Possible 89-gallon waste oil concrete sump installed in 1956.<br>• Unauthorized release (H14076-001) associated with a release of diesel fuel; case closed in 1994.<br>• 4,000-gallon diesel UST closed in place in 1997.<br>• 100-gallon diesel UST removed on unknown date. |
| Joyner IS, 4271 Myrtle Avenue | • Disposal of 0.4 ton of "contaminated soil from site cleanup" in 2006. |

| Facility Name/Address | Items of Potential Concern |
|---|---|
| Normal Heights ES, 3750 Ward Road | • Disposal of 15.71 tons of "contaminated soil from site cleanup" in 2005. |
| Wilson MS, 3838 Orange Avenue | • Two 4,000-gallon diesel USTs removed in 1988; however, piping and/or fill ports may have been left in place.<br>• One 300-gallon boiler fuel UST removed in 2019. The associated Local Oversite Program (LOP) Case #: DEH2019-LSAM-000530 was closed February 2020.<br>• Impacts on shallow soil from pesticides and lead from historical use of termiticides/pesticides and lead-based paint. |
| **Kearny Cluster** | |
| Kearny HS, 7651 Wellington Way | • 550-gallon waste oil and 4,000-gallon gasoline USTs removed in 1988.<br>• 89-gallon waste oil concrete sump. |
| Linda Vista ES/Empower – Ulric 2772 Ulric Street | • Unauthorized release (H36172-001) of diesel fuel from a 2,000-gallon UST, removed in 1997, that resulted in impacts on soil; residual soil contamination left in place; case closed in 2000. |
| School for Entrepreneurship and Technology (SET) HS, 3540 Aero Court | • Unauthorized release (H00023-001) of arsenic, lead, copper, petroleum, and solvents to soil, groundwater, and soil vapor from historical industrial operations. |
| **La Jolla Cluster** | |
| La Jolla HS, 750 Nautilus Street | • Unauthorized release (H14078-001) of waste oil from a concrete sump that resulted in impacts on soil; case closed in 1990.<br>• Unauthorized release (H14078-002) of diesel from a 1,000-gallon UST that resulted in impacts on soil; case closed in 2002.<br>• 280-gallon waste oil UST and 37-gallon waste oil concrete sump removed in 1988. |
| **Lincoln** | |
| O'Farrell Community School/Ingenuity 6130 Skyline Drive | • Unauthorized release (H24742-001) from a 6,000-gallon boiler fuel UST, removed in 1988, resulted in impacts on soil; case closed in 1988.<br>• Historical agricultural use resulted in impacts on shallow soil from pesticides and arsenic. |
| Webster ES/Holly Drive Leadership Academy, 4801 Elm Street | • Listed as a CalRecycle solid waste disposal site, Facility ID No. 37-CR-0107, based on the presence of buried burned waste.<br>• Listed as a DTSC school cleanup site, Site Code 404294, associated with the presence of burned waste, Operations & Maintenance (O&M) agreement with DTSC, and a land use covenant (LUC)/deed restriction are pending for the site. |
| **Madison Cluster** | |
| Lafayette ES, 6125 Printwood Way | • Located within a Formerly Used Defense Site (FUDS) boundary, Rosedale Field and Bombing Target, associated with possible unexploded ordnance (UXO), munitions debris (MD), and/or munitions and explosives of concern (MEC). |
| Lindbergh-Schweitzer ES, 4133 Mt. Albertine Avenue | • Located within a FUDS boundary, Rosedale Field and Bombing Target, associated with possible UXO, MD, and/or MEC. |
| Madison HS, 4833 Doliva Drive | • Located within a FUDS boundary, Rosedale Field and Bombing Target, associated with possible UXO, MD, and/or MEC. |

| Facility Name/Address | Items of Potential Concern |
|---|---|
| Sequoia ES, 4690 Limerick Avenue | • Located within a FUDS boundary, Rosedale Field and Bombing Target, associated with possible UXO, MD, and/or MEC. |
| **Mira Mesa Cluster** | |
| Mira Mesa HS, 10510 Reagan Road | • Unauthorized release (H14081-001) of waste oil resulting in impacts on soil from a 550-gallon UST removed in 1998; case closed in 1993. |
| Walker ES, 9225 Hillery Drive | • Located within a FUDS boundary, Linda Vista Landing Field, associated with possible UXO, MD, and/or MEC. |
| Wangenheim MS, 9230 Gold Coast Drive | • Located within a FUDS boundary, Linda Vista Landing Field, associated with possible UXO, MD, and/or MEC. |
| **Mission Bay Cluster** | |
| Mission Bay HS, 2475 Grand Avenue | • Unauthorized release (H14082-001) of boiler fuel that resulted in impacts on soil groundwater.<br>• 1,000-gallon boiler fuel UST closed in-place; case closed in 1992. |
| Pacific Beach MS, 4676 Ingraham Street | • Unauthorized release (H17124-001) of heating oil/boiler fuel from a 2,500-gallon UST removed in 1988 that resulted in impacts on soil; case closed in 1996. |
| Morse Cluster | |
| Bell MS, 620 Briarwood Road | • Listed as a CalRecycle land disposal site/solid waste landfill (37-CR-0088) that is not operational but is under site assessment for the presence of volatile organic compounds (VOCs) in groundwater.<br>• Undergoing investigation for potential Per- and Polyfluoroalkyl Substances (PFAS) due to former uses of the landfill per Water Board Order WQ-2019-0006-DWQ. |
| Morse HS/Twain Morse HS, 6905 Skyline Drive | • Unauthorized release (H14083-001) of boiler fuel from a 4,000-gallon UST removed in 1988 that resulted in impacts on soil; case closed in 1988.<br>• Unauthorized release (H14083-002) of boiler fuel from piping associated with the above-listed 4,000-gallon UST, which resulted in impacts on soil; case closed in 2013.<br>• Listed as a DTSC school cleanup site, Site Code 404419, that is inactive and requires action as of 2005 with potential contaminants of concern listed as lead and naturally occurring asbestos. |
| **Point Loma Cluster** | |
| Correia MS, 4302 Valeta Street | • Unauthorized release (H00132-001) of boiler fuel from a 4,000-gallon UST removed in 1988 that resulted in impacts on soil; case closed in 1989.<br>• Listed as CalRecycle land-disposal site, Famosa Boulevard Secondary Deposit Site (37-CR-0014), associated with burned waste mixed with fill soil at the site.<br>• Listed as a DTSC school cleanup site, Site Code 404627, associated with the presence of the burned waste on the site. An O&M Agreement is in place with DTSC and an LUC/deed-restriction has been recorded with the County of San Diego. |
| Dana MS, 1775 Chatsworth Boulevard | • Unauthorized release (H32250-001) of boiler fuel from two 3,000-gallon USTs removed in 1992 that resulted in impacts on soil; case closed in 2002. However, impacted soil and piping was closed in place. |

| Facility Name/Address | Items of Potential Concern |
|---|---|
| Dewey ES, 3251 Rosecrans Street | • Unauthorized release (H36169-001) of heating oil/fuel oil from a 2,000-gallon UST removed in 1997 that resulted in impacts on soil and groundwater; case closed in 2004. However, impacted soil and groundwater, and closed in place remote fill ports/piping remain. |
| Point Loma HS, 2335 Chatsworth Boulevard | • Unauthorized release (H14084-001) of waste oil from 55-gallon UST removed in 1988 that resulted in impacts on soil; case closed in 1990.<br>• Possible 123-gallon waste oil sump and 8,500-gallon boiler fuel UST onsite.<br>• Five former hydraulic lifts. |
| **San Diego Cluster** | |
| Grant K–8, 1425 Washington Place | • Listed as a CalRecycle land-disposal site (37-CR-0126) associated with buried burned waste.<br>• Listed as a DTSC school cleanup site, Site Code 404913, associated with the presence of burned waste. A PEA and a RAW for the removal of material were prepared. The RAW was approved by DTSC in 2019. |
| iVirtual HS, 3939 Conde Street | • Unauthorized release (H36175-001) of heating/fuel oil from a 1,500-gallon UST, closed in place at the site, that resulted in impacts on soil that remain onsite; case closed in 2003. |
| Logan K–8, 2875 Ocean View Boulevard | • Boiler fuel UST of unknown size closed in place. |
| Memorial Preparatory, 2850 Logan Avenue | • Unauthorized release (DEH2019-LSAM-000540) associated with a release of boiler fuel from a UST that resulted in impacts on soil; case closed in 2019.<br>• Possible USTs onsite. |
| San Diego Cooperative 2 K8, 3550 Logan Avenue | • Unauthorized release (H32216-001) of heating oil/fuel oil from a 250-gallon UST removed in 1991 that resulted in impacts on soil that remain onsite; case closed in 1992. |
| San Diego HS/East Village HS, 1405 Park Boulevard | • Unauthorized release (H02488-001) of heating oil from 1,000-gallon and 1,500-gallon USTs removed in 2002 that resulted in impacts on soil, which remains onsite; case closed in 2002. |
| Sherman ES, 450 24th Street | • Unauthorized release (H209017-001) of diesel and gasoline from a UST that resulted in impacts on soil; case closed in 2014. |
| **Scripps Ranch Cluster** | |
| • Listing of potential concern not noted | |
| **Serra Cluster** | |
| De Portola MS, 11010 Clairemont Mesa Boulevard | • Located within a FUDS boundary, Camp Elliot, associated with possible UXO, MD, MEC, and/or 2,4,6-trinitrololuene (TNT) |
| Farb MS, 4880 La Cuenta Drive | • Located within a FUDS boundary, Camp Elliot, associated with possible UXO, MC, MEC, and/or TNT. |
| Hancock ES, 3303 Taussig Street | • Located within a FUDS boundary, Camp Elliot, associated with possible UXO, MC, MEC, and/or TNT.<br>• Located on Department of Defense (DOD) land. |
| Kumeyaay ES, 6475 Antigua Boulevard | • Located within a FUDS boundary, Camp Elliot, associated with possible UXO, MD, MEC, and/or TNT.<br>• Unauthorized release (H33524-001) of waste oil that resulted in impacts on soil; case closed in 1994. |

| Facility Name/Address | Items of Potential Concern |
|---|---|
| Miller ES, 4343 Shields Street | • Located within a FUDS boundary, Camp Elliot, associated with possible, UXO, MD, MEC, and/or TNT.<br>• Located on DOD land. |
| Serra HS, 5156 Santo Road | • Located within a FUDS boundary, Camp Elliot, associated with possible UXO, MD, MEC, and/or TNT. |
| Tierrasanta ES, 5450 La Cuenta Drive | • Located within a FUDS boundary, Camp Elliot, associated with possible UXO, MD, MEC, and/or TNT. |
| Vista Grande Elementary School/Elevate Tierrasanta 5606 Antigua Boulevard | • Located within a FUDS boundary, Camp Elliot, associated with possible UXO, MD, MEC, and/or TNT. |
| **University City Cluster** | |
| • Listings of potential concern not noted. | |
| **Unassigned Cluster** | |
| • Listings of potential concern not noted. | |

## 4.8.2.2 Formerly Used Defense Sites

The U.S. Army is the Department of Defense's (DOD's) lead agency responsible for the cleanup of properties formerly owned, leased, or otherwise possessed by the United States and under the jurisdiction of the Secretary of Defense prior to October 1986 (USACE 2020). These sites are known as Formerly Used Defense Sites (FUDS). The U.S. Army Corp of Engineers (USACE) executes the FUDS Program on behalf of the U.S. Army and DOD. Potential FUDS must be reviewed for the origin and extent of contamination or munitions, past and present ownership, and other policies before approval for DOD-funded cleanup. There are 12 District-owned school sites that are located within known FUDS. Table 4.8-3 lists the school sites and the FUDS area. Rosedale Field and Dive Bombing Target (Rosedale) is a site in northern Clairemont that was historically used as an auxiliary landing field and practice bombing target. Rosedale currently has a cleanup status of "inactive – action required as of 8/15/2018" (DTSC 2020a). The Linda Vista Landing Field (Linda Vista) is located approximately 1 mile north of Miramar Naval Air Station in the Mira Mesa area. Linda Vista was used as an emergency landing area and practice bombing site by the Navy. Visual site inspections conducted in 2001 found no evidence of munitions and explosives or concern or munitions debris. Linda Vista currently has a cleanup status of "inactive – action required as of 8/15/2018" (DTSC 2020b). Camp Elliott is a former Marine Corps camp used for artillery, anti-aircraft, and machine gun training, located in eastern part of the City of San Diego, in the neighborhoods of Tierrasanta and Mission Trails, and the East Elliott Community Planning Area, as well as portions of the City of Santee. Camp Elliot has been investigated since1985 through the FUDS program, and currently has the cleanup status of "active as of 9/21/1998" (DTSC 2020c).

**Table 4.8-3. District School Sites Located Within a FUDS Area**

| School | FUDS Area |
|---|---|
| Lafayette Elementary School | Rosedale |
| Lindbergh/Schweitzer Elementary School | Rosedale |
| Madison High School | Rosedale |
| Sequoia Elementary School | Rosedale |
| Walker Elementary School | Linda Vista |
| Wangenheim Middle School | Linda Vista |
| DePortola Middle School | Camp Elliott |
| Farb Middle School | Camp Elliott |
| Hancock Elementary School | Camp Elliott |
| Kumeyaay Elementary School | Camp Elliott |
| Miller Elementary School | Camp Elliott |
| Tierrasanta Elementary School | Camp Elliott |
| Serra High School | Camp Elliott |
| Vista Grande Elementary School | Camp Elliott |

## 4.8.2.3 Proximity to Airports

There are four airports located in or within 2 miles of the District jurisdiction. The San Diego International Airport, Montgomery Field and Marine Corp Air Station (MCAS) Miramar are located within the District, while Gillespie Field is approximately 2 miles from the Program area. The San Diego County Regional Airport Authority serves as the Airport Land Use Commission (ALUC), the overseeing agency, for the region's airports. The ALUC develops Airport Land Use Compatibility Plans (ALUCP) for each airport in the region to promote compatible development of the airport and the health and safety of residents and users in the vicinity of the airport. The ALUCP identifies strategic development plans and goals and policies that all development must comply with to ensure safe and orderly growth.

### Airport Overlay Zones

The ALUCPs for each airport establish airport overlay zones to identify the areas surrounding the airports that may be impacted by noise or aircraft overflight, or where construction and development in the surrounding areas may impact the operation of the airport. The noise contour establishes a 60 decibel (dB) Community Noise Equivalent Level (CNEL) contour as the threshold above which noise compatibility standards apply for new development. The noise compatibility standards and policies do not apply to existing land uses.

Review Area 1 is defined by the combination of the 60 dB CNEL noise contour, the outer boundary of all safety zones, and the airspace Threshold Siting Surfaces (TSSs). A TSS is the critical airspace that must be protected to allow for safe approaches to runways, within which specific height limitations may apply. All policies and standards of the ALUCP apply within Review Area 1. ALUC review is required for all land use plans, regulations, and projects located in Review Area 1.

Review Area 2 is defined by the combination of the airspace protection and overflight boundaries beyond Review Area 1. Only airspace protection and overflight policies and standards apply within

Review Area 2. ALUCP regulations state that ALUC review is required for land use projects and plans within Review Area 2 if they propose increases in height limits and for land use projects that:

- Have received a Notice of Presumed Hazard, a Determination of Hazard, or a Determination of No Hazard subject to conditions, limitations, or marking and lighting requirements, from the Federal Aviation Administration (FAA); and/or
- Would create any of the following hazards:
  - Glare
  - Lighting
  - Electromagnetic interference
  - Dust, water vapor, and smoke
  - Thermal plumes
  - Bird attractants

Table 4.8-4 lists the District's schools, by cluster, and the airport overlay zone(s) in which they are located.

**Table 4.8-4. School Sites and District Facilities Within Airport Land Use Overlay Zones**

| | Airport Land Use Overlay Zone | | | | |
|---|---|---|---|---|---|
| **School Site or District Facilities** | **Review Area 1** | **Review Area 2** | **FAA Notification[1]** | **Air Noise Contours** | **Air Overflight** |
| **Clairemont Cluster** | | | | | |
| Bay Park ES | N/A | Lindbergh; Montgomery | N/A | N/A | N/A |
| Holmes ES | N/A | Montgomery | N/A | N/A | Montgomery |
| Longfellow ES | N/A | Lindbergh; Montgomery | Yes | N/A | N/A |
| Marston MS | N/A | Montgomery | N/A | N/A | N/A |
| Mt. Everest Academy | N/A | Miramar; Montgomery | N/A | N/A | Montgomery |
| Muir K12 | N/A | Miramar; Montgomery | N/A | N/A | N/A |
| Riley K12 | N/A | Miramar; Montgomery | N/A | N/A | Montgomery |
| Toler ES | N/A | Montgomery | N/A | N/A | N/A |
| Whittier K-12 | N/A | Montgomery | N/A | N/A | N/A |
| Clairemont High School | N/A | Montgomery | N/A | N/A | N/A |
| **Crawford Cluster** | | | | | |
| Clay ES | N/A | Montgomery | N/A | N/A | N/A |
| Harriet Tubman Charter | N/A | Montgomery | N/A | N/A | N/A |
| Oak Park ES | N/A | Lindbergh | N/A | N/A | N/A |

| School Site or District Facilities | Airport Land Use Overlay Zone: Review Area 1 | Airport Land Use Overlay Zone: Review Area 2 | FAA Notification[1] | Air Noise Contours | Air Overflight |
|---|---|---|---|---|---|
| **Henry Cluster** | | | | | |
| Benchley/Weinberger ES | N/A | Montgomery | Yes | N/A | N/A |
| Dailard ES | N/A | Montgomery | N/A | N/A | N/A |
| Foster ES | N/A | Montgomery | N/A | N/A | Montgomery |
| Gage ES | N/A | Gillespie | Yes | N/A | Gillespie |
| Green ES | N/A | Montgomery | N/A | N/A | N/A |
| Hardy ES | N/A | Montgomery | N/A | N/A | N/A |
| Hearst ES | N/A | Montgomery | N/A | N/A | N/A |
| Henry HS | N/A | Montgomery | N/A | N/A | N/A |
| Language Academy | N/A | Montgomery | N/A | N/A | N/A |
| Lewis MS | N/A | Montgomery | N/A | N/A | Montgomery |
| Magnolia Science Academy | N/A | Montgomery | Yes | N/A | N/A |
| Marvin ES | N/A | Montgomery | N/A | N/A | N/A |
| Pershing MS | N/A | Montgomery | Yes | N/A | N/A |
| **Hoover Cluster** | | | | | |
| Adams ES | N/A | Montgomery | N/A | N/A | N/A |
| Edison ES | N/A | Lindbergh | Yes | N/A | N/A |
| Normal Heights ES | N/A | Montgomery | N/A | N/A | N/A |
| Rowan ES | N/A | Lindbergh | Yes | N/A | Lindbergh |
| San Diego Global Vision Academy | N/A | Montgomery | N/A | N/A | N/A |
| San Diego Global Vision Academy MS | N/A | Montgomery | N/A | N/A | N/A |
| **Kearny Cluster** | | | | | |
| Angier ES | Montgomery | N/A | Yes | N/A | Montgomery |
| Carson ES | N/A | Lindbergh; Montgomery | Yes | N/A | N/A |
| Chesterton ES | N/A | Montgomery | N/A | N/A | N/A |
| Coleman Tech Charter High | Montgomery | N/A | Yes | N/A | Montgomery |
| Cubberley ES | Montgomery | N/A | N/A | N/A | Montgomery |
| Elevate ES | N/A | Montgomery | N/A | N/A | N/A |
| Empower Charter | N/A | Lindbergh; Montgomery | N/A | N/A | N/A |
| Fletcher ES | N/A | Lindbergh; Montgomery | N/A | N/A | N/A |
| Jones ES | N/A | Montgomery | Yes | N/A | Montgomery |
| Juarez ES | N/A | Montgomery | N/A | N/A | Montgomery |

| School Site or District Facilities | Airport Land Use Overlay Zone: Review Area 1 | Review Area 2 | FAA Notification[1] | Air Noise Contours | Air Overflight |
|---|---|---|---|---|---|
| Kavod ES Charter | Montgomery | N/A | N/A | N/A | Montgomery |
| Kearny Construction Tech | N/A | Montgomery | N/A | N/A | Montgomery |
| Kearny Digital Media & Design | N/A | Montgomery | N/A | N/A | Montgomery |
| Kearny International Business | N/A | Montgomery | N/A | N/A | Montgomery |
| Kearny SCT | N/A | Montgomery | N/A | N/A | Montgomery |
| Linda Vista ES | N/A | Montgomery | N/A | N/A | N/A |
| Montgomery MS | N/A | Lindbergh; Montgomery | N/A | N/A | N/A |
| Ross ES | Montgomery | Miramar | Yes | N/A | Montgomery |
| San Diego Cooperative Charter | N/A | Montgomery | N/A | N/A | N/A |
| Taft MS | Montgomery | N/A | Yes | N/A | Montgomery |
| Twain HS | N/A | Lindbergh; Montgomery | Yes | N/A | N/A |
| Wegeforth ES | Montgomery | N/A | Yes | N/A | Montgomery |
| **La Jolla Cluster** | | | | | |
| Torrey Pines ES | N/A | Miramar | N/A | N/A | N/A |
| **Lincoln Cluster** | | | | | |
| Baker ES | N/A | Lindbergh | N/A | N/A | Lindbergh |
| Chollas/Mead ES | Lindbergh | N/A | N/A | Lindbergh 60 dB | Lindbergh |
| Encanto ES | N/A | Lindbergh | N/A | | Lindbergh |
| Epiphany Prep Charter | Lindbergh | Lindbergh | N/A | Lindbergh 60 dB | Lindbergh |
| Gompers Prep Academy | N/A | Lindbergh | N/A | N/A | Lindbergh |
| Holly Drive Leadership Academy | N/A | Lindbergh | N/A | N/A | Lindbergh |
| Horton ES | Lindbergh | Lindbergh | N/A | Lindbergh 60 dB | Lindbergh |
| Ingenuity Charter | Lindbergh | N/A | N/A | Lindbergh 60 dB | Lindbergh |
| Johnson ES | N/A | Lindbergh | N/A | N/A | Lindbergh |
| Knox MS | Lindbergh | | N/A | N/A | Lindbergh |
| Lincoln HS | Lindbergh | Lindbergh | N/A | Lindbergh 60 dB | Lindbergh |
| Millennial Tech MS | N/A | Lindbergh | N/A | N/A | Lindbergh |
| Nye ES | N/A | Lindbergh | N/A | N/A | Lindbergh |
| Porter ES | N/A | Lindbergh | N/A | N/A | Lindbergh |

| School Site or District Facilities | Airport Land Use Overlay Zone: Review Area 1 | Review Area 2 | FAA Notification[1] | Air Noise Contours | Air Overflight |
|---|---|---|---|---|---|
| The O'Farrell Charter | Lindbergh | N/A | N/A | Lindbergh 60 dB | Lindbergh |
| Valencia Park ES | Lindbergh | N/A | N/A | Lindbergh 60 dB | Lindbergh |
| Webster ES | N/A | Lindbergh | N/A | N/A | Lindbergh |
| **Madison Cluster** | | | | | |
| Creative, Performing, and Media Arts | Miramar | Miramar; Montgomery | N/A | Miramar 60 dB | Montgomery |
| Field ES | N/A | Miramar; Montgomery | N/A | N/A | N/A |
| Hawthorne ES | Miramar | Miramar; Montgomery | N/A | Miramar 60 dB | N/A |
| Innovation MS | Miramar | Montgomery | N/A | Miramar 60 dB | Miramar; Montgomery |
| Lafayette ES | Montgomery | Miramar | N/A | Montgomery 60 dB | Montgomery |
| Lindbergh/Schweitzer ES | N/A | Miramar; Montgomery | N/A | N/A | Montgomery |
| Madison HS | Miramar; Montgomery | Miramar; Montgomery | N/A | Miramar and Montgomery 60 dB | Montgomery |
| Sequoia ES | N/A | Miramar; Montgomery | N/A | N/A | Montgomery |
| Whitman ES | N/A | Miramar; Montgomery | N/A | N/A | N/A |
| **Mira Mesa** | | | | | |
| Challenger MS | N/A | Miramar | N/A | N/A | Miramar |
| Ericson ES | N/A | Miramar | N/A | N/A | Miramar |
| Hage ES | N/A | Miramar | N/A | N/A | Miramar |
| Hickman ES | N/A | Miramar | N/A | N/A | N/A |
| Jonas Salk ES | N/A | Miramar | N/A | N/A | N/A |
| Mason ES | N/A | Miramar | N/A | N/A | N/A |
| Mira Mesa HS | N/A | Miramar | N/A | N/A | N/A |
| Sandburg ES | N/A | Miramar | N/A | N/A | Miramar |
| TRACE | N/A | Miramar | N/A | N/A | Miramar |
| Walker ES | N/A | Miramar | N/A | N/A | Miramar |
| Wangenheim MS | N/A | Miramar | N/A | N/A | Miramar |
| **Morse Cluster** | | | | | |
| Bell MS | N/A | Lindbergh | N/A | N/A | Lindbergh |
| Boone ES | N/A | Lindbergh | N/A | N/A | Lindbergh |
| Fulton K–8 | N/A | Lindbergh | N/A | N/A | Lindbergh |

| School Site or District Facilities | Airport Land Use Overlay Zone: Review Area 1 | Review Area 2 | FAA Notification[1] | Air Noise Contours | Air Overflight |
|---|---|---|---|---|---|
| Morse HS | Lindbergh | Lindbergh | N/A | Lindbergh 60 dB | Lindbergh |
| **Point Loma Cluster** | | | | | |
| Cabrillo ES | N/A | Lindbergh | Yes | N/A | Lindbergh |
| Correia MS | Lindbergh | N/A | Yes | Lindbergh 60 dB and 65 dB | Lindbergh |
| Dana | Lindbergh | Lindbergh | Yes | Lindbergh 60 dB | Lindbergh |
| Dewey ES | Lindbergh | N/A | Yes | Lindbergh 60 dB and 65 dB | Lindbergh |
| Explorer ES | Lindbergh | N/A | Yes | Lindbergh 60 dB and 65 dB | Lindbergh |
| High Tech ES | Lindbergh | N/A | Yes | Lindbergh 60 dB | Lindbergh |
| High Tech HS | Lindbergh | N/A | Yes | Lindbergh 60 dB and 65 dB | Lindbergh |
| High Tech HS International | Lindbergh | N/A | Yes | Lindbergh 60 dB and 65 dB | Lindbergh |
| High Tech HS Media | Lindbergh | N/A | Yes | Lindbergh 60 dB and 65 dB | Lindbergh |
| High Tech MS | Lindbergh | N/A | Yes | Lindbergh 60 dB and 65 dB | Lindbergh |
| High Tech MS Media | Lindbergh | N/A | Yes | Lindbergh 60 dB and 65 dB | Lindbergh |
| Loma Portal ES | Lindbergh | N/A | Yes | Lindbergh 60 dB, 65 dB, and 70 dB | Lindbergh |
| Ocean Beach ES | Lindbergh | N/A | N/A | Lindbergh 60 dB | Lindbergh |
| Point Loma HS | Lindbergh | N/A | Yes | Lindbergh 60 dB, 65 dB, and 70 dB | Lindbergh |
| Silver Gate ES | N/A | Lindbergh | Yes | N/A | Lindbergh |
| Sunset View ES | N/A | Lindbergh | Yes | N/A | Lindbergh |
| **San Diego Cluster** | | | | | |
| ALBA | N/A | Lindbergh | Yes | N/A | N/A |
| Albert Einstein Academy Charter MS | Lindbergh | N/A | Yes | Lindbergh 60 dB and 65 dB | Lindbergh |
| Birney ES | N/A | Lindbergh | Yes | N/A | Lindbergh |
| Burbank ES | N/A | Lindbergh | Yes | N/A | |
| E3 Civic HS | N/A | Lindbergh | N/A | N/A | Lindbergh |
| Einstein Academy | Lindbergh | N/A | Yes | Lindbergh 60 dB and 65 dB | Lindbergh |

| School Site or District Facilities | Airport Land Use Overlay Zone: Review Area 1 | Review Area 2 | FAA Notification[1] | Air Noise Contours | Air Overflight |
|---|---|---|---|---|---|
| Florence ES | N/A | Lindbergh | Yes | N/A | Lindbergh |
| Garfield ES | N/A | Lindbergh; Montgomery | Yes | N/A | |
| Garfield HS | Lindbergh | Lindbergh | Yes | Lindbergh 60 dB | Lindbergh |
| Golden Hill K–8 | Lindbergh | N/A | Yes | Lindbergh 60 dB and 65 dB | Lindbergh |
| Grant K–8 | N/A | Lindbergh | Yes | N/A | Lindbergh |
| Jefferson ES | N/A | Lindbergh | Yes | N/A | Lindbergh |
| Kimbrough ES | N/A | Lindbergh | Yes | N/A | Lindbergh |
| King-Chavez Academy of Excellence | N/A | Lindbergh | Yes | N/A | N/A |
| King-Chavez Arts Academy | N/A | Lindbergh | N/A | N/A | Lindbergh |
| King-Chavez Athletics Academy | N/A | Lindbergh | N/A | N/A | Lindbergh |
| King-Chavez Community High | N/A | Lindbergh | Yes | N/A | Lindbergh |
| King-Chavez Preparatory Academy | N/A | Lindbergh | Yes | N/A | Lindbergh |
| King-Chavez Primary Academy | N/A | Lindbergh | N/A | N/A | Lindbergh |
| KIPP Adelante Preparatory Academy | N/A | Lindbergh | Yes | N/A | Lindbergh |
| Logan K–8 | N/A | Lindbergh | Yes | N/A | N/A |
| McGill School of Success | N/A | Lindbergh | Yes | N/A | Lindbergh |
| McKinley ES | N/A | Lindbergh | Yes | N/A | N/A |
| Memorial Scholars & Athletes | N/A | Lindbergh | Yes | N/A | N/A |
| Museum | N/A | Lindbergh | Yes | N/A | Lindbergh |
| Old Town Academy K–8 Charter | N/A | Lindbergh | Yes | N/A | Lindbergh |
| Perkins K–8 | N/A | Lindbergh | N/A | N/A | N/A |
| Rodriguez ES | N/A | Lindbergh | N/A | N/A | N/A |
| Roosevelt International MS | N/A | Lindbergh | Yes | N/A | N/A |
| San Diego Business | Lindbergh | Lindbergh | Yes | Lindbergh 60 dB, 65 dB, and 70 dB | Lindbergh |
| San Diego Early/Middle College | Lindbergh | Lindbergh | Yes | Lindbergh 60 dB | Lindbergh |

| School Site or District Facilities | Airport Land Use Overlay Zone: Review Area 1 | Review Area 2 | FAA Notification[1] | Air Noise Contours | Air Overflight |
|---|---|---|---|---|---|
| San Diego International Studies | Lindbergh | Lindbergh | Yes | Lindbergh 60 dB, 65 dB, and 70 dB | Lindbergh |
| San Diego Science and Tech | Lindbergh | Lindbergh | Yes | Lindbergh 60 dB, 65 dB, and 70 dB | Lindbergh |
| Sherman ES | N/A | Lindbergh | Yes | N/A | Lindbergh |
| Urban Discovery Academy Charter | N/A | Lindbergh | Yes | N/A | Lindbergh |
| Washington ES | Lindbergh | N/A | Yes | Lindbergh 60 dB | Lindbergh |
| **Scripps Ranch Cluster** | | | | | |
| Innovations Academy | N/A | Miramar | N/A | N/A | Miramar |
| Jerabek ES | N/A | Miramar | Yes | N/A | N/A |
| Marshall MS | Miramar | Miramar | Yes | Miramar 60 dB | N/A |
| Miramar Ranch ES | N/A | Miramar | Yes | N/A | N/A |
| Scripps Ranch HS | Miramar | Miramar | Yes | Miramar 60 dB | Miramar |
| **Serra Cluster** | | | | | |
| De Portola MS | N/A | Miramar; Montgomery | Yes | N/A | N/A |
| Farb MS | N/A | Miramar; Montgomery | N/A | N/A | Montgomery |
| Hancock ES | Montgomery | Montgomery | N/A | N/A | Montgomery |
| Kumeyaay ES | N/A | Miramar; Montgomery | N/A | N/A | N/A |
| Miller ES | N/A | Miramar; Montgomery | Yes | N/A | Montgomery |
| Serra HS | N/A | Miramar; Montgomery | Yes | N/A | Montgomery |
| Tierrasanta ES | N/A | Miramar; Montgomery | Yes | N/A | N/A |
| Vista Grande ES | N/A | Miramar; Montgomery | N/A | N/A | N/A |
| **Unassigned** | | | | | |
| Audeo Charter | Miramar | N/A | N/A | Miramar 60 dB | Miramar |
| Charter School of San Diego | Miramar | N/A | N/A | Miramar 60 dB | Miramar |
| Laurel Preparatory Academy | N/A | N/A | N/A | Miramar 60 dB | Miramar |

| School Site or District Facilities | Airport Land Use Overlay Zone: Review Area 1 | Review Area 2 | FAA Notification[1] | Air Noise Contours | Air Overflight |
|---|---|---|---|---|---|
| **University City Cluster** | | | | | |
| Curie ES | N/A | Miramar | N/A | N/A | N/A |
| Doyle ES | N/A | Miramar | N/A | N/A | N/A |
| Preuss School UCSD | N/A | Miramar | N/A | N/A | N/A |
| Spreckels ES | N/A | Miramar | N/A | N/A | N/A |
| Standley MS | N/A | Miramar | N/A | N/A | N/A |
| University City HS | Miramar | Miramar | N/A | Miramar 60 dB | N/A |

[1] FAA Notification overlays are based on an imaginary surface extending outward and upward at any of the following slopes:

- 100 to 1 for a horizontal distance of 20,000 feet from the nearest point of the nearest runway of each airport described in 14 Code of Federal Regulations (CFR) 77.9(d) with its longest runway more than 3,200 feet in actual length, excluding heliports.
- 50 to 1 for a horizontal distance of 10,000 feet from the nearest point of the nearest runway of each airport described in 14 CFR 77.9(d) with its longest runway no more than 3,200 feet in actual length, excluding heliports.
- 25 to 1 for a horizontal distance of 5,000 feet from the nearest point of the nearest landing and takeoff area of each heliport described in 14 CFR 77.9(d).

dB = decibels; ES = elementary school; HS = high school; K = kindergarten; MS = middle school; N/A = not applicable; SCT = Science Connections and Technology; UCSD = University of California, San Diego.

# 4.8.3 Applicable Laws and Regulations

## 4.8.3.1 Federal

### Federal Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established a program, which is administered by the U.S. Environmental Protection Agency (EPA), to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. Under RCRA regulations, hazardous wastes must be tracked from the time of generation to the point of disposal. The RCRA program also establishes standards for hazardous waste treatment, storage, and disposal units, which are intended to have hazardous wastes managed in a manner that minimizes present and future threats to the environment and human health. At a minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed of at a facility, any treatment, storage, or disposal unit must be permitted under the RCRA. The RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous materials.

## Department of Transportation Hazardous Materials Regulations

U.S. Department of Transportation (DOT) Hazardous Materials Regulations (Code of Federal Regulations [CFR] Title 49, Parts 100–185) cover all aspects of hazardous materials packaging, handling, and transportation. Parts 107 (Hazard Materials Program), 130 (Oil Spill Prevention and Response), 172 (Emergency Response), 173 (Packaging Requirements), 177 (Highway Transportation), 178 (Packaging Specifications), and 180 (Packaging Maintenance) would all apply to goods movement to and from projects occurring under the Proposed Program and/or surrounding uses.

Enforcement of these aforementioned DOT regulations is shared by each of the following administrations under delegations from the Secretary of the DOT.

- **Research and Special Programs Administration** is responsible for container manufacturers, reconditioners, and retesters and shares authority over shippers of hazardous materials.
- **Federal Highway Administration** enforces all regulations pertaining to motor carriers.
- **Federal Railroad Administration** enforces all regulations pertaining to rail carriers.
- **FAA** enforces all regulations pertaining to air carriers.
- **U.S. Coast Guard** enforces all regulations pertaining to shipments by water.

## Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted in 1980 to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. The corresponding regulation in 42 CFR 103 provides the general framework for response actions and managing hazardous waste. CERCLA also covers environmental cleanup of FUDS, which are properties that were formerly owned by, leased to, or otherwise possessed by the United States and under the Jurisdiction of the DOD prior to October 1986. The U.S. Army is DOD's lead agent for the FUDS Program.

## Emergency Planning and Community Right-To-Know Act

The Emergency Planning and Community Right-to-Know Act was enacted by Congress as the national legislation on community safety in 1986, as Title III of the Superfund Amendments and Reauthorization Act (42 U.S. Code 11001 et seq.). This law was designated to help local communities protect public health, safety, and the environment from chemical hazards. To implement this act, Congress required each state to appoint a State Emergency Response Commission. The State Emergency Response Commissions are required to divide their states into Emergency Planning Districts and to name a Local Emergency Planning Committee for each district. The act provides requirements for emergency release notification, chemical inventory reporting, and toxic release inventories for facilities that handle chemicals.

### Occupational Safety and Health Act of 1970

The Occupational Safety and Health Act establishes the framework for safe and healthful working conditions for working men and women by authorizing enforcement of the standards developed under the act. The act also provides for training, outreach, education, and assistance related to establishing a safe working environment. Regulations defining safe standards have been developed for general industry, construction, maritime, recordkeeping, and agriculture. A major component of the act is the requirement that employers implement the Occupational Safety and Health Act Hazard Communication Standard to provide information to employees about the existence and potential risks of exposures to hazardous substances in the workplace. As part of the Hazard Communication Standard, employers must:

- Obtain material safety data sheets from chemical manufacturers that identify the types and handling requirements of hazardous materials used in given areas;
- Make the material safety data sheets available to their employees;
- Label chemical containers in the workplace;
- Develop and maintain a written hazard communication program; and
- Develop and implement programs to train employees about hazardous materials.

Occupational Safety and Health Administration standards specific to hazardous materials are listed in 29 CFR 1910 Subpart H. Safety and health regulations pertaining to construction are listed in 29 CFR 1926 Subpart H.

## 4.8.3.2 State

### Cortese List

California Government Code 65962.5 (commonly referred to as the *Cortese List*) includes hazardous waste facilities and sites listed by DTSC, Department of Health Services lists of contaminated drinking water wells, sites listed by the State Water Resources Control Board (SWRCB) as having underground storage tank leaks or a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites with a known migration of hazardous waste/material.

### California Health and Safety Code (Hazardous Waste Control Act)

DTSC, a department of the California Environmental Protection Agency, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of the Federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Division 20, Chapter 6.5, of the California Health and Safety Code identifies hazardous waste control regulations pertaining to transportation, treatment, recycling, disposal, enforcement, and the permitting of hazardous waste. Division 20, Chapter 6.10, identifies regulations applicable to the cleanup of hazardous materials releases. Title 22, Division 4.5, contains environmental health standards for the management of hazardous waste, as well as standards for the identification of hazardous waste (Chapter 11), and standards that are applicable to transporters of hazardous waste (Chapter 13).

## Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

This program (California Health and Safety Code, Chapter 6.11, Sections 25404–25404.9) consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of the environmental and emergency response programs and provides authority to the Certified Unified Program Agency (CUPA). The CUPA for San Diego County is the San Diego County Department of Environmental Health's Hazardous Materials Division (HMD), which has the responsibility and authority for implementing and enforcing the requirements listed in Chapter 6.5 (commencing with Section 25100), Chapter 6.67 (commencing with Section 25270), Chapter 6.7 (commencing with Section 25280), Chapter 6.95 (commencing with Section 25500), and Sections 25404.1 and 25404.2, including the following.

- **Aboveground Petroleum Storage Act Requirements for Spill Prevention, Control, and Countermeasure (SPCC) Plans.** Facilities with a single tank or cumulative aboveground storage capacities of 1,320 gallons or greater of petroleum-based liquid product (e.g., gasoline, diesel, lubricants) must develop an SPCC plan. An SPCC plan must be prepared in accordance with the oil pollution prevention guidelines in 40 CFR 112. This plan must describe the procedures, methods, and equipment needed at the facility to prevent discharges of petroleum from reaching navigable waters. A registered professional engineer must certify the SPCC plan, and a complete copy of the plan must be maintained on site.
- **California Accidental Release Prevention Program.** This program requires any business that handles more than threshold quantities of an extremely hazardous substance to develop a Risk Management Plan. The Risk Management Plan is implemented by the business to prevent or mitigate releases of regulated substances that could have offsite consequences through hazard identification, planning, source reduction, maintenance, training, and engineering controls.
- **Hazardous Materials Business Plan/Hazardous Materials Inventory Statements.** Hazardous Materials Business Plans contain basic information regarding the location, type, quantity, and health risks of hazardous materials and/or waste. Each business must prepare a Hazardous Material Business Plan if that business uses, handles, or stores a hazardous material and/or waste or an extremely hazardous material in quantities greater than or equal to the following.
    - 55 gallons for a liquid
    - 500 pounds for a solid
    - 200 cubic feet for any compressed gas
    - Threshold planning quantities of an extremely hazardous substance
- **Hazardous Waste Generator Program**. This program regulates businesses that generate any amount of a hazardous waste. Proper handling, recycling, treating, storing, and disposing of hazardous waste are key elements to this program.
- **Tiered Permitting Program**. This program regulates the onsite treatment of hazardous waste.
- **Underground Storage Tank Program.** This program regulates the construction, operation, repair, and removal of underground storage tanks that store hazardous materials and/or waste.

## Hazardous Waste Control Act

DTSC is responsible for the enforcement of the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which creates the framework under which hazardous wastes are managed in California. The Hazardous Waste Control Act requires a hazardous waste generator that stores or accumulates hazardous waste for periods greater than 90 days at an onsite facility or for periods greater than 144 hours at an offsite or transfer facility, which treats or transports hazardous waste, to obtain a permit to conduct such activities. The law provides for the development of a state hazardous waste program that administers and implements the provisions of the Federal RCRA for a cradle-to-grave waste management system in California. It also provides for the designation of California-only hazardous waste and development of standards that are equal to or, in some cases, more stringent than Federal requirements, such as mandating source-reduction planning and regulating the number of types of waste and waste management activities that are not covered by Federal law with the RCRA.

## Environmental Health Standards for the Management of Hazardous Waste

These standards (California Code of Regulations [CCR], Title 22, Division 4.5, Section 66001 et seq.) establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the State Hazardous Waste Control Act and Federal RCRA.

## California Code of Regulations, Title 8—Industrial Relations

Title 8 of the California Code of Regulations, Section 1532.1 is a rule developed by the Federal Occupational Safety and Health Administration in 1993 and adopted by the State of California. This rule is comparable to the Federal standards described above. Occupational safety standards exist in Federal and State laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The Federal Occupational Safety and Health Administration and the California Division of Occupational Safety and Health (Cal/OSHA) are responsible for ensuring worker safety in the workplace. Cal/OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. These standards would be applicable to both construction and operation of projects occurring under the Proposed Program. Title 8 includes regulations pertaining to hazard control (including administrative and engineering controls), hazardous chemical labeling and training requirements, hazardous exposure prevention, hazardous material management, and hazardous waste operations.

Title 8 also specifies requirements for the removal and disposal of asbestos-containing materials (ACMs). In addition to providing information regarding how to remove ACMs, specific regulations limit the time of exposure, regulate access to work areas, require demarcation of work areas, prohibit certain activities in the presence of ACM removal activities, require the use of respirators, require monitoring of work conditions, require appropriate ventilation, and require qualified persons for ACM removal.

Title 8 also covers the removal of lead-based paint (LBP). Specific regulations cover the demolition of structures that contain LBP, the process associated with its removal or encapsulation, remediation of lead contamination, the transportation/disposal/ storage/containment of lead or materials containing lead, and maintenance operations associated with construction activities involving lead, such as LBP. Similar to ACM removal, LBP removal requires proper ventilation, respiratory protection, and qualified personnel.

## California Labor Code (Division 5, Parts 1 and 7)

California Labor Code regulations ensure appropriate training regarding the use and handling of hazardous materials and the operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5, ensures that employees who handle hazardous materials are appropriately trained and informed about the materials. Division 5, Part 7, ensures that employees who work with volatile flammable liquids are outfitted with appropriate safety gear and clothing.

## State Water Resources Control Board Construction General Permit (2009-0009-DWQ)

Construction activities that disturb 1 acre or more of land must obtain coverage under the SWRCB Construction General Permit (Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ, and Order 2012-006-DWQ). Under the terms of the permit, applicants must file a complete and accurate Notice of Intent and Permit Registration Documents with the SWRCB. Applicants must also demonstrate conformance with applicable construction Best Management Practices (BMPs) and prepare a construction Storm Water Pollution Prevention Plan containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site.

## California Education Code Section 17213

The California Education Code (CEC) is the set of laws related to all kindergarten through 12th grade (K-12) public schools in California. The San Diego County Board of Education is responsible for complying with and enforcing these laws. The CEC includes several regulations intended to protect students and staff from exposure to hazards or hazardous materials at public school facilities. The California Department of Education has the primary responsibility of ensuring new school sites or existing schools sites being expanded are protected from hazardous conditions. New school site acquisitions that would use state funding are required to receive approval from the Department of Education's School Facilities Planning Division, which certifies to the California Office of Public School Construction, an office in the California Department of General Services, that the new or existing school site is free from contamination or hazards that would make it an unsafe school site.

Section 17213 (subdivision a) stipulates a governing school board cannot approve an acquisition of a school site unless it has determined it is not located on any of the following:

- The site of a current or former hazardous waste disposal site or solid waste disposal site, unless if the site was a former solid waste disposal site, the governing board concludes the solid waste has been removed;
- A hazardous substance release site identified by the DTSC in a current list adopted pursuant to Section 25356 of the Health and Safety Code for removal or remedial action pursuant to Chapter 6.8 (commencing with Section 25300) of Division 20 of the Health and Safety Code;
- A site that contains one or more pipelines, situated underground or aboveground, that carries hazardous substances, extremely hazardous substances, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to the that school or neighborhood.

However, per Section 17213.1, as a condition of receiving state funding, a school district is not required to comply with Section 17213, subdivision (a) described above, and shall comply with the following

requirements prior to the acquisition of a school site, or if a school district owns or leases a school site, prior to construction of a project.

- Prior to acquiring a school site, the school district shall contract with an environmental assessor to supervise the preparation of, and sign, a Phase I environmental site assessment (ESA). The Phase I ESA must be submitted and reviewed by the Department of Toxic Substances Control (DTSC).
- If the Phase I ESA recommends a preliminary endangerment assessment (PEA) is needed, or after reviewing the Phase I ESA the DTSC determines a PEA is needed, the school district must either contract with an environmental assessor for the preparation of a PEA and enter into an agreement with the DTSC to oversee the preparation of the PEA, or, elect not to pursue the acquisition or expansion project.

## Education Code Section 17251/California Code of Regulations, Title 5

Education Code Section 17251 and CCR, Title 5, Sections 14001 through 14012, outline the powers and duties of the Department of Education regarding school sites and the construction of school buildings. Districts seeking state funding must comply with the Education Code and CCR Title 5. Site approval from the Department of Education must be granted before the State Allocation Board will apportion funds. Districts using local funds are encouraged to seek the Department's approval. The California Department of Education issues and maintains a *School Site Selection and Approval Guide* to assist school districts in selecting sites that provide a safe and supportive environment for the instructional program and the learning process. The guide outlines the selection criteria for gaining California Department of Education approval, a condition for receiving state funds.

## DTSC Interim Guidance

The DTSC prepared a guidance to provide a streamlined approach to evaluating potential school sites across the state. The *Interim Guidance: Evaluation of School Sites with Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers* was released in 2006. Historically, building materials often used in school buildings and auxiliary structures contained certain substances that were later determined to be hazardous. This includes LBP and other lead-containing materials. DTSC considers lead from LBP to be a potential threat in residences constructed before January 1, 1979, school buildings constructed before January 1, 1993, and commercial/industrial structures constructed at any time. Additionally, organochlorine pesticides were commonly used as insecticides for termite control (termiticides) around structures and may have been applied surficially or injected into the surrounding soil. Wooden structures or structures with wooden components constructed prior to January 1, 1989, are most likely to contain organochlorine pesticides from termiticide application. Also, electrical transformers installed before January 1, 1979, are most likely to contain polychlorinated biphenyls.

DTSC guidance suggests evaluation of lead from LBP, organochlorine pesticides from termiticides, or polychlorinated biphenyls from electrical transformers may be addressed in a Phase I or Phase I Addendum if the site is a school, residence, or commercial property; if these are the only recognized environmental conditions on site; and if the environmental review process for the site has not reached a PEA. A PEA would be used to evaluate contamination if there are additional recognized environmental conditions identified on the site. DTSC has prepared extensive guidance, including soil sampling and sample analysis, for the evaluation of lead, organochlorine pesticides, and

polychlorinated biphenyls on proposed new or expanding school sites that would be incorporated into either a Phase I, Phase I Addendum, or PEA.

# 4.8.3.3 Regional

## San Diego County Code, Title 6, Division 8

San Diego County Code of Regulatory Ordinances under Title 6, Division 8, Chapters 8 through 11 establish the HMD as the local CUPA. The HMD is responsible for the protection of public health, safety, and the environment and inspects businesses or facilities that handle or store hazardous materials, generate hazardous waste, generate medical waste, and own or operate underground storage tanks. HMD also administers the California Accidental Release Prevention Program and the Aboveground Petroleum Storage Act Program, and provides specialized instruction to small businesses through its Pollution Prevention Specialist. HMD has the authority under State law to inspect facilities with hazardous materials or hazardous waste and, in cases where a facility is in non-compliance with the applicable State law or regulations, take enforcement action.

Projects are required to notify HMD regarding the use, handling, release (spills), storage, and/or disposal of hazardous materials and hazardous waste in accordance with existing State law and County ordinance. The notification is the initial step in the HMD permitting process, which requires businesses that handle or store hazardous materials, are part of the California Accidental Release Prevention Program, generate or treat hazardous wastes, generate or treat medical waste, store at least 1,320 gallons of aboveground petroleum, or own and/or operate underground storage tanks to obtain and maintain a Unified Program Facility Permit. The online notification must be done using the State of California Environmental Reporting System by the applicant/permittee requesting a permit and be submitted within 30 days.

If a building permit is required, Section 65850.2 of the California Government Code prohibits building departments from issuing a final Certificate of Occupancy unless a business or facility that handles hazardous materials has submitted and met the requirements of a Hazardous Materials Business Plan. The Hazardous Materials Business Plan contains detailed information on the storage of hazardous materials at regulated facilities and serves to prevent or minimize damage to public health, safety, and the environment from a release or threatened release of a hazardous material. The Hazardous Materials Business Plan also provides emergency response personnel with adequate information to help them better prepare and respond to chemical-related incidents at regulated facilities.

## Operational Area Emergency Plan

The San Diego County Operational Area was formed to help the County and its cities develop emergency plans, implement such plans, develop mutual aid capabilities between jurisdictions, and improve communications between jurisdictions and agencies. The San Diego County Operational Area consists of the County and all jurisdictions within the County. The Operational Area Emergency Plan is for use by the County and all of the cities within the County to respond to major emergencies and disasters. It defines roles and responsibilities of all County departments and many city departments.

Cities within the County are encouraged to adopt the Operational Area Emergency Plan, with modifications that would be applicable to each city. The plan is updated once every 4 years by the

Office of Emergency Services and the Unified Disaster Council of the Unified San Diego County Emergency Services Organization.

# 4.8.3.4 Local

## City of San Diego Solid Waste Local Enforcement Agency

The City's Solid Waste Local Enforcement Agency is responsible for enforcing Federal and State laws and regulations for the safe and proper handling of solid waste. State law (Public Resources Code) requires that every local jurisdiction designate a solid waste Local Enforcement Agency that is certified by the Department of Resources Recycling and Recovery to enforce Federal and State laws and regulations for the safe and proper handling of solid waste.

Any development plan proposing to handle, process, transport, store, or dispose of solid wastes including household trash and garbage, construction debris, commercial refuse, sludge, ash, discarded appliances and vehicles, manure, landscape clippings, and other discarded wastes shall contact the Local Enforcement Agency for determination of the need for a solid waste facility permit.

## RWQCB Municipal Permit (Order No. R9-2013-0001)

The Municipal Stormwater Permit (Order No. R9-2013-0001 as amended by Order Nos. R9-2015-001 and R9-2015-0100) is a National Pollutant Discharge Elimination System (NPDES) permit issued that requires the owners and operators of Municipal Separate Storm Sewer Systems (MS4s) within the San Diego region to implement management programs to limit discharges of pollutants and non-stormwater discharges to and from their MS4 from all phases of development. The Municipal Stormwater Permit requires the District and other "copermittees" to develop watershed-based Water Quality Improvement Plans. The Municipal Stormwater Permit emphasizes watershed program planning and program outcomes. The intent of the permit is to enable each jurisdiction to focus its resources and efforts to:

- Reduce pollutants in stormwater discharges from its MS4;
- Effectively prohibit non-stormwater discharges to its MS4; and
- Achieve the interim and final [Water Quality Improvement Plan] numeric goals.

Projects occurring under the Proposed Program would be required to comply with the NPDES permit requirements.

## Temporary Groundwater Extractions Permit (Order No. R9-2007-0034)

Order No. R9-2007-0034 is intended to cover temporary discharges of groundwater extraction wastes to the San Diego Bay, and its tributaries under tidal influence, from groundwater extraction due to construction and other groundwater extraction activities. Dischargers must meet the applicable criteria listed in the permit to be subject to waste discharge requirements under this permit. Receiving water limitations are based on water quality objectives contained in the Basin Plan and are a required part of the permit. The discharge of groundwater extraction waste from any site cannot, separately or jointly with any other discharge, cause violations of certain water quality objectives in the Bay.

## San Diego Unified School District's Standard Construction Specifications

All projects within the District are required to comply with the District's most recent Standard Construction Specifications during construction of a project. Several of the standard specifications require compliance with existing regulations or require contractors to avoid or minimize impacts. Some of the sections of the specifications related to reducing hazards and hazardous materials impacts include, but are not limited to, the following:

- Section 01 45 00, Environmental Testing of Imported Fill Materials, of the District's Standard Construction Specifications.
- Section 02 82 33, Removal and Disposal of Asbestos Containing Materials, of the District's Standard Construction Specifications, which includes all labor, materials, facilities, equipment, services, employee training, permits, agreements, waste transport, and disposal necessary to perform the work required for asbestos removal in accordance with specifications from EPA, the Air Pollution Control District (APCD), Occupational Safety and Health Administration (OSHA), National Institute for Occupational Safety and Health (NIOSH), State of California regulations, and any other applicable Federal, State, and local government regulations.
- Section 02 83 33, Removal and Disposal of Material Containing Lead, of the District's Standard Construction Specifications, which includes all labor, materials, facilities, equipment, services, employee training, permits, agreements, waste transport, and disposal necessary to perform the work required for removal of materials containing lead in accordance with specifications from EPA, APCD, OSHA, NIOSH, State of California regulations, and any other applicable Federal, State, and local government regulations.
- Section 02 84 33, Removal and Disposal of Universal Waste and PCB, of the District's Standard Construction Specifications, which includes standards for the abatement of potential hazards relating to materials falling under the RCRA Universal Waste Rule (UWR), materials potentially containing polychlorinated biphenyls (PCB), and UWR/PCB contaminated materials.

## San Diego County Regional Airport Authority

The San Diego County Regional Airport Authority is the ALUC for San Diego County under the authority of the State Aeronautics Act pursuant to Public Utilities Code Section 21001 et seq. Article 3.5 of the Aeronautics Act outlines the responsibilities of the ALUC, including preparation of an ALUCP for compatible development of the area surrounding an airport. An ALUCP does not regulate the development of an airport or have authority or existing land uses; only the safe and appropriate development of future land uses in the vicinity of an airport, as well as the health and safety of the public within the vicinity. The San Diego County Regional Airport Authority is responsible for adopting ALUCPs for 16 public-use and military airports in San Diego County. An ALUCP focuses on defined areas around each airport defining noise, safety, and airspace protection factors in accordance with guidance from the *California Airport Land Use Planning Handbook* published by the California Department of Transportation, Division of Aeronautics. The goals and regulations found within the ALUCP apply to land use plans, projects, and regulations that fall within these defined areas described by the ALUCP.

The FAA Notification overlay outlines the area surrounding the airport required to comply with Federal law requiring notification to the FAA for the construction of new structures or objects in the airspace. Federal law 14 CFR Part 77 Notification Criteria requires project sponsors of structures or objects such as antennas, trees, or construction cranes, that exceed the Part 77 height criteria to submit to the FAA a Notice of Proposed Construction or Alternation (Form 7460-1). Additionally, the FAA may require notification for structures that may cause signal reception interference with

navigational aids (NAVAIDS). The Part 77 height criteria apply to objects taller than 200 feet above the ground anywhere in the United States and shorter objects within 20,000 feet of runways longer than 3,200 feet or within 10,000 feet of shorter runways.

The airspace protection boundary is based on the outermost edge of the Part 77 Subpart B 100:1 notification surface boundary; Part 77 civil airport imaginary airspace surfaces; the approach surfaces for both runway ends defined by the criteria in FAA Order 8260.3B; and the TSSs.

The Safety Compatibility Zones establish where the safety standards and policies apply to different land use categories. There are five safety zones in total. The ALUCPs for each airport identify the standards and policies that apply to each safety zone. Standards may restrict development of new structures or types of land uses allowed in each zone.

The overflight boundary establishes the area around the airport where an overflight notification agreement must be recorded with the Office of the County Recorder for any new dwelling unit within the overflight area.

# 4.8.4 Impact Analysis

## 4.8.4.1 Methodology

The following impact analysis evaluates the effects from hazards and hazardous materials that may result with implementation of the construction and operational activities associated with each project category. Based upon the existing conditions described above, the impact analysis assesses the direct and indirect impacts related to hazards and hazardous materials and determines whether the Proposed Program would trigger a threshold listed below. Mitigation measures are provided, where applicable.

## 4.8.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining significance of impacts associated with hazards and hazardous materials resulting from the Proposed Program. The determination of whether a hazards and/or hazardous materials impact would be significant is based on the thresholds described below and the professional judgment of the District as Lead Agency and the recommendations of qualified personnel at ICF and Ninyo & Moore, all of which is based on the evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following.

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. 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.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

4. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.
5. Be located within an airport land use plan or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard or excessive noise for people residing or working within the vicinity of the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

As discussed in Section IX of the Initial Study/Environmental Checklist (Appendix B), Thresholds 1, 3, and 6 are not included in the analysis below, because it was determined the Proposed Program would not result in significant impacts related to a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials; emit hazardous emissions or use hazardous materials within one-quarter mile of an existing or proposed school; or impair the implementation of an emergency response plan. Those conclusions and the rationale that supports them are summarized in Chapter 6, *Additional Consequences of Project Implementation.* Therefore, only Thresholds 2, 4, and 5 are discussed in the following impact analysis. The impacts related to exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires is discussed in Section 4.16, *Wildfire.*

# 4.8.4.3 Impacts and Mitigation Measures

***Threshold 2: Would the Proposed Program 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?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

***Construction***

*Use of Common Hazardous Materials*

Construction of new school or administrative facilities would involve the temporary use of hazardous materials commonly used during construction, such as petroleum-based substances (fuels, solvents, lubricants, paints, and oils), as well as metals, cleaners, and other construction materials. Generally, common construction-related hazardous materials are not acutely hazardous materials. The transport, use, and disposal of construction-related hazardous materials would be required to comply with applicable regulations, as described above, such as the RCRA, DOT Hazardous Materials Regulations, California Code of Regulations, California Labor Code, and the District's Standard Construction Specifications; and would be subject to regulatory agency oversight and inspection, including by the applicable fire departments (storage) and County Department of Environmental Health (DEH). These regulations, and the accompanying oversight, would prevent

potential impacts related to reasonably foreseeable upset and accident conditions from the release of hazardous materials used during construction activities.

*Encountering Contaminated Media*

Excavation, grading, or other ground-disturbing activities during construction of new school or administrative facilities could encounter potential hazardous material sites; however, the locations of future sites are unknown at the time of this writing and therefore were not included in the environmental database search or Table 4.8-2. All school site acquisitions of properties proposed for student occupation receiving state funding are required to have a Phase I ESA prepared, and a PEA prepared if recommended by the Phase I ESA (per CEC Section 17213.1, described in Section 4.8.3.2) or required by DTSC. The preparation of a Phase I ESA and PEA would identify possible sources of hazardous material contamination on the site to be acquired. If needed, the PEA will recommend the remediation of the site due to the contamination, which would reduce or remove the potential hazard to students, staff, the public, and the environment associated with the potential contamination. However, not all new acquisitions would be funded by the state or would be for properties that will be used for student occupation. As such, not all potential future new acquisitions would be required to comply with these existing regulations. Because the existing hazardous conditions of some future acquisition sites are unknown, new acquisition and new school or administrative facilities construction could result in the encounter of hazardous materials, which would have the potential to exacerbate hazardous conditions onsite (**Impact-HAZ-1**).

In order to address potential unknown hazardous contamination on future acquisition project sites that would not receive state funding (**Impact-HAZ-1**), an ESA (Phase I, Phase I Addendum, and/or Phase II ESA/PEA) would be conducted prior to project construction for future, currently unknown project sites (**MM-HAZ-1**). If the ESA identifies potential environmental concerns, **MM-HAZ-3** through **MM-HAZ-7** would be implemented. In addition, if the project is under the jurisdiction of the DTSC, based on the recommendation of the ESA, the DTSC may require further remedial documentation and/or action, in which case, the proposed project would be required to implement the remedial action. The mitigation would reduce the potential impact resulting from potential contamination on future project sites to less than significant.

*Encountering Asbestos-Containing Materials and Lead-Based Paint*

New acquisition and new school or administrative facilities construction could require demolition of old buildings or structures. Per DTSC guidelines, residential buildings built before January 1, 1979, and school structures built before January 1, 1993, have the potential to contain LBP (DTSC 2006). Additionally, DTSC guidance notes that any commercial/industrial building may contain LBP, regardless of the date it was constructed. DTSC does not offer guidance on ACMs for schools; however, generally buildings built before 1980 have the potential to contain ACMs (OSHA 1995). The demolition of such buildings could release these materials to the air or the environment if proper measures are not implemented. Any demolition or grading activities would be required to comply with CCR Title 8, Industrial Relations, which provides specific guidance on removal and disposal of ACM, and lead-containing surfaces. Additionally, future projects would comply with the District's Standard Construction Specifications, Section 02 82 33, which provide standards for the abatement of ACMs, as well as Section 02 83 33, which includes standards for abatement of lead containing materials. These requirements include preconstruction surveys for the presence of ACMs and lead-containing surfaces that would need to be conducted by California Department of Public Health Certified Lead Inspector/Assessors and California Division of Occupational Safety and Health

Certified Asbestos Consultants. If surveys identify the presence of ACMs or LBP, these requirements include the proper procedures for removal and disposal of contaminated materials. As such, compliance with existing regulations would ensure that removal of any ACM and/or lead-containing materials would be conducted in a safe manner, including proper disposal in an approved facility.

In addition, concentrations of lead in the soil can be above acceptable levels at or in the vicinity of the dripline of a structure (the edge of the roof where rain water might drip off) or in areas where runoff from structures may flow at the site of current or former residences built before January 1, 1979, schools built before January 1, 1992, or commercial/industrial buildings of any age, because lead used in building materials or paint may have leeched from these materials and contaminated the soil surrounding the structure. Furthermore, organochlorine pesticides, often used historically as termiticides for wooden structures (or structures with wooden components), may be present in the soil surrounding existing or historic structures built before January 1, 1989 (DTSC 2006). For new acquisitions that have or had structures older than the above thresholds, and that would receive state funding, the DTSC would require the investigation into lead or organochlorine pesticides in soils at these properties through a Phase I ESA Addendum or PEA. If the site investigation indicated contaminated soils were present onsite, DTSC would oversee the remediation and closure of the site. Therefore, existing regulatory oversight would ensure that potential contamination would be identified and removed, and would not be exposed to the environment or the public.

*Formerly Used Defense Sites*

FUDS are sites that were formerly owned by, leased to, or otherwise possessed by the DOD and require environmental restoration. FUDS sites could contain potential contamination or munitions from past DOD activities. Ground-disturbing activities related to construction of new school or administrative facilities could encounter hazards related to FUDS. New acquisitions, as yet unknown, could be listed as FUDS sites. If unexploded ordnances (UXO), munitions debris (MD) and/or munitions or explosives of concern (MEC) are located within the proposed disturbance areas of these school or administrative facility sites, construction activities would have the potential to disturb and possibly explode these munitions with related contamination, which would create a significant hazard to the public and the environment through reasonably foreseeable upset and accident conditions (**Impact-HAZ-2**).

If ground-disturbing activities are proposed within a FUDS at a new, as yet unknown site (**Impact-HAZ-2**), the District will prepare and implement a Munitions Response Plan (**MM-HAZ-2**). The Munitions Response Plan will include procedures in the event UXO is discovered during construction, as well as awareness briefings for contractors so that they are trained in the procedures. In addition, Miller Elementary School, located at 4343 Shields Street, San Diego, CA 92124 and Hancock Elementary School, located at 3303 Taussig Street, San Diego, CA 92124 are both located within the Camp Elliot Tierra Santa FUDS area. However, they are located on land leased to the District by the United States Department of the Navy. Specifically, both schools are within the Murphy Canyon Naval Housing (MCNH), Munitions Response Plan (MRP) Site 6. Munitions Response Program Site 6 encompasses the entire MCNH area, as well as the open spaces and canyons that surround it, and is owned by the Navy. MCNH includes approximately 2,321 homes used for Navy housing and remains under the administrative oversight of Naval Base San Diego (NBSD), specifically the Naval Ordnance Safety and Security Activity (NOSSA). Any ground-disturbing activities at these two schools require specific coordination and oversight with the Navy NOSSA as identified in **MM-HAZ-2.** The impacts would be reduced to less than significant.

***Operation***

Operation of the Proposed Program is not expected to 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. Implementation of the Proposed Program would continue existing use of the existing school sites and other District-owned properties, which would include the use of common hazardous materials, such as cleaners, solvents, fuels, oils, or lubricants, typically used for routine cleaning and maintenance activities. All hazardous materials would be used in accordance with applicable regulations, such as the RCRA, DOT Hazardous Materials Regulations, and the local CUPA regulations, as summarized in Section 4.8.3, *Existing Conditions*. Operations of the Proposed Program would not include ground-disturbing activities that would have the possibility of encountering contaminated soils, groundwater, or soil vapor or the hazardous materials listed on an environmental database. Therefore, operations would not result in a significant hazard to the public or the environment due to reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-HAZ-1: Encounter Hazardous Materials During Construction at New Acquisition Sites.** Ground-disturbing construction activities at future, unknown sites may encounter soil, groundwater, or vapor contaminated with hazardous materials due to previous uses of the property, that are not listed on Table 4.8-2, which could result in a significant hazard to the public or the environment. This is a potentially significant impact.

**Impact-HAZ-2: Encounter Contamination or Munitions on Sites Listed as Formerly Used Defense Sites.** Ground-disturbing activities at new acquisition and new school or administrative facilities, the locations of which are as yet unknown, could occur on a Formerly Used Defense Site (FUDS). This ground disturbance could encounter potential contamination or munitions from unexploded ordnance (UXO), munitions debris (MD), or munitions and explosives of concern (MECs). This could result in a significant hazard to the public or the environment. This is a potentially significant impact.

### Operation

Operation of new school or administrative facilities would not result in impacts associated with significant hazards to the public or the environment due to reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

### Mitigation Measures

For **Impact-HAZ-1:**

**MM-HAZ-1: Conduct an Environmental Site Assessment.** Prior to acquisition, if not required per California Education Code (CEC) 17213, property-specific due diligence shall be conducted by a licensed Professional Geologist, Professional Engineering Geologist, or Professional Engineer with more than 2 years of experience conducting hazardous material and contamination assessments. The following steps shall be implemented, as appropriate.

- **Prepare Phase I Environmental Site Assessment.** A Phase I Environmental Site Assessment (ESA) shall be conducted in accordance with the standard of care at that time

(currently the ASTM Standard Practice E1527-13) and applicable regulations (currently the U.S. Environmental Protection Agency's [EPA's] 40 Code of Federal Regulations 312: *Standards and Practices for All Appropriate Inquiries*). If the Phase I ESA is being prepared for a project that will use state funding, the Phase I ESA must also be prepared in accordance with the requirements detailed in in California Code of Regulations Section 69104.

- **Prepare a Phase I ESA Addendum**. For a project that will use state funding, Department of Toxic Substances Control (DTSC) permits evaluation of lead from lead-based paint (LBP), organochlorine pesticides from termiticides, or polychlorinated biphenyls from electrical transformers to be addressed in a Phase I Addendum if the site is a school, residential, or commercial property; if these are the only recognized environmental conditions on site; and if the environmental review process for the site has not reached a Preliminary Environmental Assessment (PEA). The work should be performed in accordance with the DTSC's *Interim Guidance: Evaluation of School Sites with Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers (2006).* A PEA would be used to evaluate contamination if there are additional recognized environmental conditions identified on the site or if the Phase I Addendum identifies significant contamination (see below). DTSC may permit for a Phase I and Phase I Addendum to be submitted as a PEA equivalent document.
- **Prepare Phase II ESA/PEA.** Based on the findings of the Phase I ESA and/or Phase I Addendum, further evaluation through a Phase II ESA or PEA (for projects utilizing state funding) may be recommended, in which case a Phase II ESA or PEA shall be conducted prior to any disturbance of the area suspected of potential contamination, as indicated by the Phase I ESA or Phase I Addendum. For properties with cases under regulatory oversight, the regulatory agency may require an approved work plan prior to commencement of the Phase II ESA or PEA. Results of previous assessment activities for a property (e.g., previous Phase II ESAs, underground storage tank [UST] removal sampling data), if any, shall be evaluated by a qualified environmental hazardous materials professional with more than 2 years of experience preparing and evaluating Phase II ESAs/PEAs. If a PEA is required, it should be prepared in accordance with the current DTSC *Preliminary Endangerment Assessment Guidance Manual*. If the PEA concludes that significant contamination is present, the DTSC may require additional evaluation as detailed in Figure 1-1 Cleanup Process in the DTSC's *Preliminary Endangerment Assessment Guidance Manual*.

If the Phase I ESA or the Phase II ESA/PEA indicate potential sites of environmental concern are present on the project site, **MM-HAZ-3** through **MM-HAZ-7** (see below) shall then be implemented as appropriate; or if DTSC requires additional remedial documentation and/or action beyond the scope of **MM-HAZ-3** through **MM-HAZ-7**, such as a Remedial Action Work Plan/Remedial Action Plan, these requirements shall be implemented.

For **Impact-HAZ-2:**

**MM-HAZ-2: Prepare a Munitions Response Plan for New District Sites.** For work occurring within a new acquisition or new school construction site that is located within a known Formerly Used Defense Site (FUDS) area, the following procedures shall be implemented to ensure safety for all students, staff, and contractors working in these areas:

- Preparation of a Munitions Response Plan (MRP) consistent with the District's MRP template (see Appendix H) shall be required for the new school or new administrative facility located within the known FUDS areas. The purpose of the MRP is to outline the procedures that must take place in the event an unexploded ordnance is discovered during ground-disturbing activities.
- An unexploded ordnance (UXO) awareness briefing shall be conducted for all District staff and contractors who will be involved in any ground disturbance at a new school or administrative facility in a known FUDS area. The awareness briefings shall be completed prior to the start of ground-disturbing activities. Any new personnel shall be trained prior to beginning work on site. See Appendix H for a sample briefing,
- Any ground disturbance at new school or administrative facilities located within the Rosedale and Linda Vista FUDS areas shall require a preconstruction survey of the area to be disturbed by a qualified UXO technician using a magnetometer, ground penetrating radar, or other appropriate equipment, to locate any potential hazards. The preconstruction survey is meant as a preliminary tool to assess the risk of UXO presence and shall not be used to provide UXO clearance for ground-disturbing activities. All construction-related ground-disturbing activity into native and nonnative soils shall require a UXO technician be present. Monitoring may also be performed in lieu of a preconstruction survey if the presence of UXO materials is assumed.
- Monitoring shall be performed during ground disturbance at any new school or administrative facility site where the preconstruction survey identified the presence of a UXO or other hazard. Monitoring shall be conducted by a qualified UXO technician. Monitoring may also be performed in lieu of a preconstruction survey if the presence of UXO materials is assumed.
- Miller Elementary School, located at 4343 Shields Street, San Diego, CA 92124 and Hancock Elementary School, located at 3303 Taussig Street, San Diego, CA 92124 are both located within the Camp Elliot Tierra Santa FUDS area. However, they are located on land leased to the District by the United States Department of the Navy. Prior to any ground-disturbing activities at these two schools, the District shall coordinate with Naval Ordnance Safety and Security Activity (NOSSA). For additional information regarding ground-disturbing activities at these two schools the District shall contact the Department of the Navy, Naval Ordnance Safety and Security Activity, Farragut Hall 3817, Strauss Avenue, Suite 108 Indian Head, MD 20640-5151, Attn: Captain. Eric Bray (301-744-6003). The Navy NOSSA will provide oversight and ensure that all ground-distributing activities follow the Navy's protocols to ensure that any potential risk associated with UXOs is avoided.

### Level of Significance After Mitigation

#### *Construction*

In order to address potential unknown hazardous contamination on future acquisition project sites that would not receive state funding (**Impact-HAZ-1**), an ESA (Phase I, Phase I Addendum, and/or Phase II ESA/PEA) would be conducted prior to project construction for future, currently unknown project sites (**MM-HAZ-1**). If the ESA identifies potential environmental concerns, **MM-HAZ-3** through **MM-HAZ-7** would then be implemented. In addition, if the project is under the jurisdiction of the DTSC, based on the recommendation of the ESA, the DTSC may require further remedial documentation and/or action, in which case the proposed project would be required to implement

the remedial action. The mitigation would reduce the potential impact resulting from potential contamination on future project sites. The impacts would be reduced to less than significant.

If ground-disturbing activities are proposed within a FUDS at a new, as yet unknown site (**Impact-HAZ-2**), the District will prepare and implement a Munitions Response Plan (**MM-HAZ-2**). The MRP will include procedures in the event UXO is discovered during construction, as well as awareness briefings for contractors so that they are trained in the procedures. The impacts would be reduced to less than significant.

***Operation***

Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

## Whole Site Modernization; Upgrades of Existing School and Administrative Sites; and Joint Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

***Construction***

*Use of Common Hazardous Materials*

Construction related to whole site modernization, upgrades of existing school and administrative sites, and joint use facilities would involve the temporary use of hazardous materials commonly used during construction, such as petroleum-based substances (fuels, solvents, lubricants, paints, and oils), as well as metals, cleaners, and other construction materials. Generally, common construction-related hazardous materials are not acutely hazardous materials. The transport, use, and disposal of construction-related hazardous materials would be required to comply with applicable regulations, as described above, such as the RCRA, DOT Hazardous Materials Regulations, California Code of Regulations, California Labor Code, and the District's Standard Construction Specifications; and would be subject to regulatory agency oversight and inspection, including by the applicable fire departments (storage) and County DEH. These regulations, and the accompanying oversight, would prevent potential impacts related to reasonably foreseeable upset and accident conditions from the release of hazardous materials used during construction activities.

*Encountering Contaminated Media*

Implementation of the Proposed Program could include whole site modernization, upgrades of existing school and administrative sites, and construction of joint-use facilities at existing District-owned facilities. All of these project categories could involve excavation, grading, and other ground-disturbing activities. If the District-owned school or facility site is listed in Table 4.8-2, ground-disturbing activities during construction could potentially encounter hazardous materials associated with the environmental database listings described in the table. The listings include hazardous conditions such as contaminated soil, groundwater, and/or vapor due to past spills or leaks of hazardous materials, or past land uses such as waste disposal. Exposure to these hazardous materials by workers, the public, or the environment due to ground disturbance would exacerbate the existing risk associated with the hazardous materials onsite. As such, implementation of whole site modernization, upgrades of existing school and administrative sites, and joint use facilities could 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 (**Impact-HAZ-3**).

In order to address the presence of known or suspected onsite contamination listed in Table 4.8-2 (**Impact-HAZ-3**), a Site Screening Memorandum will be prepared for future projects (**MM-HAZ-3**). The Site Screening Memorandum will provide a review of readily available documentation, will indicate the presence and extent of contamination, and will indicate additional studies or plans that are needed, if any. If indicated by **MM-HAZ-3**, a Site Characterization Report (**MM-HAZ-4**) will be prepared. The Site Characterization Report will determine the location, type, and extent of the known or suspected onsite contamination, and if the scope of work for a future proposed project would be likely to encounter the onsite contamination. If it is determined that the project would encounter onsite contamination, a Soil Management Plan or Soil and Groundwater Management Plan (**MM-HAZ-5**) will be prepared to outline the appropriate measures associated with monitoring of the disturbed soil, soil and groundwater handling, stockpiling, characterization, onsite reuse, export, and disposal protocols. If a proposed project has been determined to be likely to encounter existing environmental hazards, a Worker Health and Safety Plan (**MM-HAZ-6**) and a Community Health and Safety Plan (**MM-HAZ-7**) will be prepared and implemented during construction activities to ensure workers onsite and the adjacent community are protected from exposure to potential environmental and health hazards. Implementation of **MM-HAZ-3** through **MM-HAZ-7** would ensure potential onsite contamination would be handled properly, and workers and the public would be protected from potential exposure to hazardous materials. The impacts would be reduced to less than significant.

*Encountering Asbestos-Containing Materials and Lead-Based Paint*

Whole site modernization, upgrades of existing school and administrative sites, and joint use facilities projects could require demolition of old buildings or structures. Per DTSC guidelines, residential buildings built before January 1, 1979, and school structures built before January 1, 1993, have the potential to contain LBP (DTSC 2006). Additionally, DTSC guidance notes that any commercial/industrial building may contain LBP, regardless of the date it was constructed. DTSC does not offer guidance on ACMs for schools; however, generally buildings built before 1980 have the potential to contain ACMs. The demolition of such buildings could release these materials to the air or the environment if proper measures are not implemented. Any demolition or grading activities would be required to comply with CCR Title 8, Industrial Relations, which provides specific guidance on removal and disposal of ACM, and lead-containing surfaces. Additionally, future projects would comply with the District's Standard Construction Specifications, Section 02 82 33, which provide standards for the abatement of ACMs, as well as Section 02 83 33, which includes standards for abatement of lead containing materials. These requirements include preconstruction surveys for the presence of ACMs and lead-containing surfaces that would need to be conducted by California Department of Public Health Certified Lead Inspector/Assessors and California Division of Occupational Safety and Health Certified Asbestos Consultants. If surveys identify the presence of ACMs or LBP, these requirements include the proper procedures for removal and disposal of contaminated materials. As such, compliance with existing regulations would ensure that removal of any ACM and/or lead-containing materials would be conducted in a safe manner, including proper disposal in an approved facility.

In addition, concentrations of lead in the soil can be above acceptable levels at or in the vicinity of the dripline of a structure (the edge of the roof where rain water might drip off) or in areas where runoff from structures may flow at the site of current or former residences built before January 1,

1979, schools built before January 1, 1992, or commercial/industrial buildings of any age, because lead used in building materials or paint may have leeched from these materials and contaminated the soil surrounding the structure. Furthermore, organochlorine pesticides, often used historically as termiticides for wooden structures (or structures with wooden components), may be present in the soil surrounding existing or historic structures built before January 1, 1989 (DTSC 2006). Ground-disturbing construction activities involved in whole site modernization, upgrades of existing school and administrative sites, and joint use facilities projects could encounter levels of lead or organochlorine pesticides above acceptable levels (**Impact-HAZ-4**).

In order to address potential impacts from lead- or pesticide-contaminated soil due to historic land uses on an existing or future District site (**Impact-HAZ-4**), **MM-HAZ-3** through **MM-HAZ-7** would then be implemented, as appropriate. The mitigation would reduce the potential impact resulting from lead and/or pesticide contamination to less than significant.

*Formerly Used Defense Sites*

FUDS are sites that were formerly owned by, leased to, or otherwise possessed by the DOD and require environmental restoration. FUDS sites could contain potential contamination or munitions from past DOD activities. Ground-disturbing activities related to whole site modernization, upgrades of existing school and administrative sites, and joint use facilities projects, could encounter hazards related to FUDS for schools listed in Table 4.8-3 as being listed on the FUDS database. If UXOs, MD and/or MEC are located within the proposed disturbance areas of these school or administrative facility sites, construction activities would have the potential to disturb and possibly explode these munitions with related contamination, which would create a significant hazard to the public and the environment through reasonably foreseeable upset and accident conditions (**Impact-HAZ-5**).

If ground-disturbing activities are proposed within any of the 14 schools located within the known FUDS identified in Table 4.8-3 (**Impact-HAZ-5**), the District will prepare and implement a Munitions Response Plan (**MM-HAZ-8**). The MRP will include procedures in the event UXO is discovered during construction, and require awareness briefings for contractors so that they are trained in the procedures. The impacts would be reduced to less than significant.

***Operation***

Operation of the Proposed Program is not expected to 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. Implementation of the Proposed Program would continue existing use of the existing school sites and other District-owned properties, which would include the use of common hazardous materials, such as cleaners, solvents, fuels, oils, or lubricants, typically used for routine cleaning and maintenance activities. All hazardous materials would be used in accordance with applicable regulations, such as the RCRA, DOT Hazardous Materials Regulations, and the local CUPA regulations, as summarized in Section 4.8.3. Operations of the Proposed Program would not include ground-disturbing activities that would have the possibility of encountering contaminated soils, groundwater, or soil vapor or the hazardous materials listed on an environmental database. Therefore, operations would not result in a significant hazard to the public or the environment due to reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-HAZ-3: Encounter Hazardous Materials During Ground-Disturbing Activities.** Ground-disturbing construction activities at the existing District-owned sites listed in Table 4.8-2 may encounter soil, groundwater, or soil vapor contaminated with hazardous materials, which could result in significant hazard to the public or the environment. This is a potentially significant impact.

**Impact-HAZ-4: Encounter Lead or Organochlorine Pesticides in Soil During Construction.** Ground-disturbing activities at the site of an existing or former residential structure built before 1980, a school structure built prior to 1992, or any commercial/industrial structure could encounter lead-contaminated soil. Ground-disturbing activities at the site of an existing or former wooden structure (or structure with wooden components) built prior to January 1, 1989, could encounter pesticide-contaminated soil surrounding the structure. Disturbance of these soils could result in a significant hazard to the public or the environment. This is a potentially significant impact.

**Impact-HAZ-5: Encounter Contamination or Munitions on Sites Listed as Formerly Used Defense Sites.** Ground-disturbing activities at a Formerly Used Defense Site (FUDS) school or administrative facility listed in Table 4.8-3 could encounter potential contamination or munitions from unexploded ordnance (UXO), munitions debris (MD), or munitions and explosives of concern (MECs). This could result in a significant hazard to the public or the environment. This is a potentially significant impact.

#### *Operation*

Operation of Whole Site Modernization; Upgrades of Existing School and Administrative Sites; and Joint Use Facilities Development Including Fields, Pools, and Play All Day Program would not result in impacts associated with significant hazards to the public or the environment due to reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

### Mitigation Measures

For **Impact-HAZ-3** and **Impact-HAZ-4:**

**MM-HAZ-3: Prepare a Site Screening Memorandum.** If implementation of whole site modernization, upgrades of existing school and administrative sites, and joint use facilities projects includes ground-disturbing activities, and any such projects are located at one of the school sites listed in Table 4.8-2, during project design and prior to construction, a Site Screening Memorandum, or equivalent, shall be prepared that includes a review of readily available information pertaining to the site to identify if there are any known environmental concerns/hazards at the site that the project may impact.

The sources of information to be reviewed should include the Environmental Conditions/ Hazards report prepared by Ninyo & Moore and dated August 9, 2019; regulatory agency online databases (e.g., State Water Resources Control Board's GeoTracker, Department of Toxic Substances Control's [DTSC's] Envirostor, United States Army Corps of Engineers Formerly Used Defense Site [FUDS] databases); and readily available online historical aerial photographs (e.g., Google Earth).

In addition, the memorandum should evaluate if a proposed project is located on a site that included historic land uses that may have involved the use of lead-based paints (LBPs) or termiticides. The lines of evidence that should be evaluated include:

- **Age of construction of the building(s).** Residential buildings constructed prior to January 1, 1979, school structures constructed prior to January 1, 1992, and commercial/industrial structures of any age may have/had LBP; and buildings constructed prior to January 1, 1989, may have had termiticides applied to soil surrounding the building.
- **Building construction components.** If the building(s) do/does not have wooden components, then termiticide impacts are not a concern.
- **Documentation of termiticide application**. If the District can provide written documentation, which may include a statement signed by a District-representative, that termiticides have not been applied to the soil at the site, then impacts are not a concern.
- **LBP survey reports**. Any survey reports available that include testing of the potential lead-containing surfaces on the exterior of the building(s) should be reviewed. Lead in soil would only be a concern if survey results indicate LBP is present on the exterior of the building(s).
- **Drainage off of the structure.** If drainage off of the building(s) is directed only to paved areas prior to discharge off of the site, then lead impacts on soil would not be considered a concern.
- **Pavement present around the building(s).** If no unpaved areas are present within 4 feet of the building(s) then lead impacts on soil would not be a concern surrounding the building(s); however, lead impacts on soil may be a concern in areas where runoff from the building(s) may flow if those areas are unpaved.

The memorandum should provide one of the following conclusions:

- No known environmental concerns/hazards identified on the site.
- Environmental concerns/hazards identified on the site, but the project will not impact the concerns/hazards.
- Environmental concerns/hazards identified on the site, and the project will impact one or more concern/hazard; however, documents have already been prepared that sufficiently address how to manage the concerns/hazards that will be impacted. (Note: These documents may include, but are not limited to, Soil Management Plans, Operations and Maintenance Plans, Worker Health and Safety Plans, and Community Health and Safety Plans.)
- Environmental concerns/hazards identified on the site, but additional studies and/or plans are needed to determine if, or to what extent, the project will impact a concern/hazard or to address how to manage the concerns/hazards that will be impacted. The memorandum should provide a recommendation for the additional studies and/or plans needed.

If the Site Screening Memorandum indicates additional studies or plans are needed to evaluate the potential for impacts or to address how to manage the concerns/hazards to be impacted, **MM-HAZ-2** through **MM-HAZ-7**(see below) will then be implemented, as appropriate.

**MM-HAZ-4: Prepare a Site Characterization Report.** The District shall prepare a Site Characterization Report to confirm the presence of onsite contamination if recommended by the

Site Screening Memorandum. The Site Characterization Report may include onsite sampling to confirm the presence and determine the extent of the contamination, and if the proposed work onsite would encounter or exacerbate the contamination. The Site Characterization Report will include an evaluation of the location and scope of proposed work on the site, and provide sufficient information regarding the location, extent, and level of contamination present for the preparation of the appropriate plans to manage the contamination during the project.

If the Site Characterization Report confirms onsite contamination is present and will be impacted by the project, **MM-HAZ-3** through **MM-HAZ-5** (see below) shall then be implemented as appropriate.

**MM-HAZ-5: Prepare a Soil Management Plan.** If the Site Screening Memorandum or Site Characterization Report determines the proposed work may encounter onsite soil and/or groundwater contamination, during project design and prior to construction, the District shall obtain a consultant to prepare a Soil Management Plan (or Soil and Groundwater Management Plan if groundwater will be encountered that has or may have been impacted by existing environmental hazards), if no existing Soil Management Plan exists. The Soil Management Plan shall be prepared by a licensed Professional Geologist, Professional Engineering Geologist, or Professional Engineer with experience in contaminated site redevelopment and restoration and be implemented during soil-disturbing activities under the oversight of a qualified environmental professional on behalf of the District. The plan shall address monitoring of the disturbed soil, soil and groundwater handling, stockpiling, characterization, onsite reuse, export, and disposal protocols. Appropriate references of the potential to encounter contaminated soils and/or groundwater shall be included in construction specifications and bid documents so that the contractor can consider various environmental factors (e.g., groundwater pumping rates, soil disposal, worker health and safety) are appropriately and cost-effectively managed by the contractor. The Soil Management Plan shall be submitted to the District for review and approval. After the District's review and approval, the contractor shall implement the Soil Management Plan.

**MM-HAZ-6: Prepare a Project-Specific Worker Health and Safety Plan.** For proposed projects that may disturb existing hazardous conditions, the District and the contractor performing the work on behalf of the District, prior to the start of construction, shall each prepare a project-specific Worker Health and Safety Plan for their respective workers. The Worker Health and Safety Plan shall include site-specific information, requirements, and guidelines to be followed while conducting activities that may disturb the existing hazardous materials of concern, which may include but are not limited to, grading, excavation, trenching, boring, dewatering, stockpiling, reusing, handling, or disposing of wastes; and, other applicable site activities. The Worker Health and Safety Plan shall be prepared in accordance with the Federal and State Occupational Safety and Health Administration Hazardous Waste Operations and Emergency Response (HAZWOPER) Standards: 29 Code of Federal Regulations (CFR) 1910.120 and 8 California Code of Regulations (CCR) 5192. The Worker Health and Safety Plan shall include contingencies (i.e., if unknown or unanticipated environmental conditions may exist at the site) for a variety of situations that may arise. The Worker Health and Safety Plan shall be based on the Site Characterization Report, Soil Management Plan, and the planned site construction activities to ensure that site workers potentially exposed to site contamination in soil, groundwater, or vapor are trained, equipped, and monitored during site activity. The training, equipment, and monitoring activities shall ensure that workers are not exposed to contaminants above personnel exposure limits established by Table Z, 29 CFR 1910.1000. The

Worker Health and Safety Plan shall be signed by and implemented under the oversight of a California State Certified Industrial Hygienist.

**MM-HAZ-7: Prepare a Community Health and Safety Plan.** If the Site Characterization Report determines the proposed work may encounter onsite contamination, during project design and prior to construction, the District must prepare a Community Health and Safety Plan for the project site if no such plan exists. The Ninyo & Moore Environmental Conditions/Hazards Report, included as Appendix H to this PEIR, shall be reviewed to determine if a Master Community Health and Safety Plan has already been prepared for the site. The Community Health and Safety Plan shall address field procedures, anticipated contaminants on the project site, and established action levels for exposure to contaminants; and provide contingency plans for emergencies that may arise during fieldwork that may encounter hazardous materials. The Community Health and Safety Plan shall be prepared in general accordance with the current DEH Site Assessment and Mitigation Manual Guidelines. If a Master Community Health and Safety Plan has been prepared for the site, it shall be reviewed to determine if regulatory agency notifications of project-specific activities or monitoring are required. The Community Health and Safety Plan shall be implemented by the District during activities that may encounter existing hazardous materials to ensure the public and surrounding properties were protected from potential health and environmental hazards during these activities and indicate that unacceptable community exposure to adverse conditions did not occur during these activities.

For **Impact-HAZ-5:**

**MM-HAZ-8: Prepare a Munitions Response Plan for Existing District Sites.** For work occurring within any of the 14 schools located within the known Formerly Used Defense Site **(**FUDS) identified in Table 4.8-3, the following procedures shall be implemented to ensure safety for all students, staff, and contractors working in these areas:

- Preparation of a Munitions Response Plan (MRP) consistent with the District's MRP template (see Appendix H) shall be required for the 14 identified schools located within the known FUDS areas. The purpose of the MRP is to outline the procedures that must take place in the event an unexploded ordnance is discovered during ground-disturbing activities.
- An unexploded ordnance (UXO) awareness briefing shall be conducted for all District staff and contractors who will be involved in any ground disturbance at any of the 14 identified schools shown in Table 4.8-5. The awareness briefings shall be completed prior to the start of ground-disturbing activities. Any new personnel shall be trained prior to beginning work on site. See Appendix H for a sample briefing.
- Any ground disturbance at schools located within the Rosedale and Linda Vista FUDS areas shall require a preconstruction survey of the area to be disturbed by a qualified UXO technician using a magnetometer, ground penetrating radar, or other appropriate equipment, to locate any potential hazards. The preconstruction survey is meant as a preliminary tool to assess the risk of UXO presence and shall not be used to provide UXO clearance for ground-disturbing activities. All construction-related ground-disturbing activity into native and nonnative soils shall require a UXO technician be present.
- Monitoring shall be performed during ground disturbance at any school site where the preconstruction survey identified the presence of a UXO or other hazard. Monitoring shall be conducted by a qualified UXO technician.

**Table 4.8-5. District Facilities Located within FUDS Areas and Corresponding Mitigation**

| School | FUDS Area | Awareness Briefing | Site Surveys | Monitoring |
|---|---|---|---|---|
| Lafayette Elementary School | Rosedale | Yes | Yes | Yes,-if required |
| Lindbergh/Schweitzer Elementary School | Rosedale | Yes | Yes | Yes,-if required |
| Madison High School | Rosedale | Yes | Yes | Yes,-if required |
| Sequoia Elementary School | Rosedale | Yes | Yes | Yes,-if required |
| Walker Elementary School | Linda Vista | Yes | Yes | Yes,-if required |
| Wangenheim Middle School | Linda Vista | Yes | Yes | Yes,-if required |
| DePortola Middle School | Camp Elliott | Yes | No | No |
| Farb Middle School | Camp Elliott | Yes | No | No |
| Hancock Elementary School | Camp Elliott | | | |
| Kumeyaay Elementary School | Camp Elliott | Yes | No | No |
| Miller Elementary School | Camp Elliott | | | |
| Tierrasanta Elementary School | Camp Elliott | Yes | No | No |
| Serra High School | Camp Elliott | | | |
| Vista Grande Elementary School | Camp Elliott | Yes | No | No |

Source: Ninyo & Moore 2019

### Level of Significance After Mitigation

#### *Construction*

In order to address the presence of known or suspected onsite contamination listed in Table 4.8-2 (**Impact-HAZ-3**), a Site Screening Memorandum will be conducted for future projects (**MM-HAZ-3**). The Site Screening Memorandum will provide a review of readily available documentation, will indicate the presence and extent of contamination, and will indicate additional studies or plans that are needed, if any. If indicated by **MM-HAZ-3**, a Site Characterization Report (**MM-HAZ-4**) will be prepared. The Site Characterization Report will determine the location, type, and extent of the known or suspected onsite contamination, and if the scope of work for a future proposed project would be likely to encounter the onsite contamination. If it is determined the proposed project would encounter onsite contamination, a Soil Management Plan or Soil and Groundwater Management Plan (**MM-HAZ-5**) will be prepared to outline the appropriate measures associated with monitoring of the disturbed soil, soil and groundwater handling, stockpiling, characterization, onsite reuse, export, and disposal protocols. If a proposed project has been determined to be likely to encounter existing environmental hazards, a Worker Health and Safety Plan (**MM-HAZ-6**) and a Community Health and Safety Plan (**MM-HAZ-7**) will be prepared and implemented during construction activities to ensure workers onsite and the adjacent community are protected from exposure to potential environmental and health hazards. Implementation of **MM-HAZ-3** through **MM-HAZ-7** would ensure potential onsite contamination would be handled properly, and workers and the public would be protected from potential exposure to hazardous materials. The impacts would be reduced to less than significant.

In order to address potential impacts from lead- or pesticide-contaminated soil due to historic land uses on an existing or future District site (**Impact-HAZ-4**), **MM-HAZ-3** through **MM-HAZ-7** would

then be implemented, as appropriate. The mitigation would reduce the potential impact resulting from lead and/or pesticide contamination to less than significant.

If ground-disturbing activities are proposed within any of the 14 schools located within the known FUDS identified in Table 4.8-5 (**Impact-HAZ-5**), the District will prepare and implement a Munitions Response Plan (**MM-HAZ-8**). The MRP will include procedures in the event UXO is discovered during construction, as well as awareness briefings for contractors so that they are trained in the procedures. The impacts would be reduced to less than significant.

***Operation***

Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

## Site-Specific Analysis

### Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.8-6. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the whole site modernization project category.

**Table 4.8-6. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |

| School | Location |
|---|---|
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019.

### Construction

Construction of near-term, site-specific whole site modernization projects would involve the use of hazardous materials commonly used during construction, such as petroleum-based substances, as well as metals, cleaners, and other construction materials. The transport, use, and disposal of construction-related hazardous materials would be required to comply with applicable regulations, as described above, such as the RCRA, DOT Hazardous Materials Regulations, California Code of Regulations, California Labor Code, and the District's Standard Construction Specifications; and would be subject to regulatory agency oversight and inspection, including by the applicable fire departments (storage) and County DEH. These regulations, and the accompanying oversight, would prevent potential impacts related to reasonably foreseeable upset and accident conditions from the release of hazardous materials used during construction activities.

Near-term, site-specific whole site modernization construction activities could involve ground disturbance, such as excavation, grading, or trenching. Ground-disturbing construction activities could encounter subsurface hazardous material contamination from historic or current uses. Table 4.8-7 lists school sites that would be the location of near-term, site-specific whole site modernization projects that are also listed on an environmental database for hazardous materials. The environmental database listings could include hazardous conditions such as contaminated soil or groundwater due to past spills or leaks of hazardous materials, or past land uses such as waste disposal.

**Table 4.8-7. Near-Term, Site-Specific Whole-Site Modernization Projects Located on Environmental Database Listed Sites**

| School | Location | Database Listings of Potential Concern |
|---|---|---|
| Clairemont High School | 4150 Ute Drive (92117) | • 6,000-gallon diesel UST, removed 1988.<br>• Concrete waste oil sump installed in 1958.<br>• California Department of Resources Recycling and Recovery (CalRecycle) solid waste disposal site, Facility ID No. 37-CR-0015, based on the presence of buried burned waste.<br>• DTSC school cleanup site, Site Code 404864, associated with the presence of burned waste. |
| Correia Middle School | 4302 Valeta Street (92107) | • Unauthorized release (H00132-001) of boiler fuel from a 4,000-gallon UST removed in 1988 that resulted in impacts on soil; case closed in 1989.<br>• Listed as a CalRecycle land-disposal site, Famosa Blvd. Secondary Deposit Site (37-CR-0014), associated with burned waste mixed with fill soil at the site.<br>• Listed as a DTSC school cleanup site, Site Code 404627, associated with the presence of the burned waste on the site. An O&M Agreement is in place with DTSC and an LUC/deed-restriction |

| School | Location | Database Listings of Potential Concern |
|---|---|---|
| | | has been recorded with the County of San Diego. |
| Kearny High School | 1954 Komet Way (92111) | • 550-gallon waste oil and 4,000-gallon gasoline USTs removed in 1988.<br>• 89-gallon waste oil concrete sump. |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) | • Unauthorized release (H17104-001) associated with a failed tank-integrity test; case<br>• Closed in 1987.<br>• 6,000-gallon diesel UST removed in 1988. |
| Madison High School | 4833 Doliva Drive (92117) | • Located within a FUDS boundary, Rosedale Field and Bombing Target, associated with possible UXO, MD, and/or MEC. |

Near-term, site-specific whole site modernization projects that occur at the school sites listed in Table 4.8-7 may encounter existing hazardous materials, which may expose workers, the public, or the environment to the otherwise contained hazardous materials, which could exacerbate the existing hazardous conditions. As such, near-term, site-specific whole site modernization projects at these sites could result in a significant impact on the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials to the environment (**Impact-HAZ-3**).

The preparation of a Site Screening Memorandum (**MM-HAZ-3**), a Site Characterization Report (**MM-HAZ-4**), Soil Management Plan or Soil and Groundwater Management Plan (**MM-HAZ-5**), a Worker Health and Safety Plan (**MM-HAZ-6**), and a Community Health and Safety Plan (**MM-HAZ-7**) would reduce the significant impact associated with the encounter of known or suspected hazardous materials contamination (**Impact-HAZ-3**). Implementation of **MM-HAZ-3** through **MM-HAZ-7** would ensure onsite contamination would be handled properly, and workers and the public would be protected from potential exposure to hazardous materials. The impact would be less than significant following mitigation.

Near-term, site-specific whole site modernization projects may include the demolition or reconstruction of buildings or structures built before 1980. As discussed above in the *Program-Level Analysis,* such buildings were often constructed with ACMs, asbestos-containing construction materials, and LBP or lead-containing surfaces, and the demolition of such buildings could release these hazardous materials into the environment. Demolition of these buildings would comply with CCR Title 8, Industrial Relations, and the District's Standard Construction Specifications, Section 02 82 33 and Section 02 83 33. Lead can also be found in soil at the dripline of a residential structure built prior to January 1, 1989, a school building built before January 1, 1993, or a commercial/ industrial building of any age, because lead used in building materials or paint may have leeched into the soil. In addition, organochlorine pesticides used as termiticides may be present in the soil surrounding existing or historic structures that were constructed prior to 1989. Ground-disturbing construction activities involved in near-term, site-specific whole site modernization projects could encounter levels of lead or organochlorine pesticides above acceptable levels (**Impact-HAZ-4**).

In order to address potential impacts from lead- or pesticide-contaminated soil due to historic land uses on an existing or future District site (**Impact-HAZ-4**), **MM-HAZ-3** through **MM-HAZ-7** would

then be implemented, as appropriate. The mitigation would reduce the potential impact resulting from lead and/or pesticide contamination to less than significant.

Ground-disturbing activities at FUDS sites could encounter hazards related to past DOD activities. Madison High School is proposed for a near-term, site-specific whole site modernization project and is located on a site listed on the FUDS database. If UXOs, MD, and/or MECs are located within the proposed disturbance areas of this near-term, site-specific whole site modernization project, construction activities would have the potential to disturb and possibly explode these munitions with related contamination, which would create a significant hazard to the public and the environment through reasonably foreseeable upset and accident conditions (**Impact-HAZ-6**).

If ground-disturbing activities are proposed within the Madison High School site (**Impact-HAZ-6**), the District will prepare and implement a Munitions Response Plan (**MM-HAZ-8**). The MRP will include procedures in the event UXO is discovered during construction, as well as awareness briefings for contractors so that they are trained in the procedures. The impacts would be reduced to less than significant.

### Operation

Operation of near-term, site-specific whole site modernization projects would include the use of common hazardous materials, such as cleaners, solvents, fuels, oils, or lubricants, typically used for routine cleaning and maintenance activities. These materials would be used in accordance with applicable regulations, such as the RCRA, DOT Hazardous Materials Regulations, and the local CUPA regulations, as summarized in Section 4.8.3. Operation would not involve ground-disturbing activities that would have the possibility of encountering hazardous materials listed on an environmental database. Therefore, operations would not result in a significant hazard to the public or the environment due to reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

## Level of Significance Prior to Mitigation

### Construction

**Impact-HAZ-3**: **Encounter Hazardous Materials During Ground-Disturbing Activities.** Ground-disturbing construction activities at the existing District-owned sites listed in Table 4.8-2 may encounter soil, groundwater, or soil vapor contaminated with hazardous materials, which could result in significant hazard to the public or the environment. This is a potentially significant impact.

**Impact-HAZ-4: Encounter Lead or Organochlorine Pesticides in Soil During Construction.** Ground-disturbing activities at the site of an existing or former residential structure built before 1980, a school structure built prior to 1992, or any commercial/industrial structure could encounter lead-contaminated soil. Ground-disturbing activities at the site of an existing or former wooden structure (or structure with wooden components) built prior to January 1, 1989, could encounter pesticide-contaminated soil surrounding the structure. Disturbance of these soils could result in a significant hazard to the public or the environment. This is a potentially significant impact.

**Impact-HAZ-6: Encounter Contamination or Munitions at Madison High School During Ground-Disturbing Activities.** Because Madison High School is located within the Rosedale Formerly Used Defense Site (FUDS) area, ground-disturbing activities could encounter potential contamination or munitions from unexploded ordnance (UXO), munitions debris (MD), or munitions

and explosives of concern (MECs). This could result in a significant hazard to the public or the environment. This is a potentially significant impact.

### Operation

Operation would not involve ground-disturbing activities that would have the possibility of encountering hazardous materials listed on an environmental database. Therefore, operations would not result in a significant hazard to the public or the environment due to reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

## Mitigation Measures

For **Impact-HAZ-3** and **Impact-HAZ-4:**

Implement **MM-HAZ-3** through **MM-HAZ-7**, as described above.

For **Impact-HAZ-6:**

Implement **MM-HAZ-8,** as described above.

## Level of Significance After Mitigation

### Construction

The preparation of a Site Screening Memorandum (**MM-HAZ-3**), a Site Characterization Report (**MM-HAZ-4**), Soil Management Plan or Soil and Groundwater Management Plan (**MM-HAZ-5**), a Worker Health and Safety Plan (**MM-HAZ-6**), and a Community Health and Safety Plan (**MM-HAZ-7**) would reduce the significant impact associated with the encounter of known or suspected hazardous materials contamination (**Impact-HAZ-3**). Implementation of **MM-HAZ-3** through **MM-HAZ-7** would ensure onsite contamination would be handled properly, and workers and the public would be protected from potential exposure to hazardous materials. The impact would be less than significant.

In order to address potential impacts from lead- or pesticide-contaminated soil due to historic land uses on an existing or future District site (**Impact-HAZ-4**), **MM-HAZ-3** through **MM-HAZ-7** would then be implemented, as appropriate. The mitigation would reduce the potential impact resulting from lead and/or pesticide contamination to less than significant.

If ground-disturbing activities are proposed within the Madison High School site (**Impact-HAZ-6**), the District will prepare and implement a Munitions Response Plan (**MM-HWZ-8**). The MRP will include procedures in the event UXO is discovered during construction, as well as awareness briefings for contractors so that they are trained in the procedures. The impacts would be reduced to less than significant.

### Operation

Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

***Threshold 4: Would the Proposed Program be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities;

#### Impact Discussion

##### *Construction*

New school construction and new property acquisitions could be listed on a hazardous materials database compiled pursuant to Government Code Section 65962.5. Without knowing the location of the future acquisitions, it cannot be determined if the listing of the site on a hazardous materials database would result in a significant hazard to the public or the environment. As discussed under Threshold 2, new acquisition and new school or administrative facilities could involve ground-disturbing activities, which have the potential to encounter contaminated media. Encountering contaminated media during construction could bring hazardous contamination to the ground surface, and could expose the public or the environment to hazardous materials (**Impact-HAZ-1**).

In order to address potential future sites for new acquisition and new school or administrative facilities that are listed on a hazardous materials database (**Impact-HAZ-2**), an ESA (Phase I ESA, Phase I ESA Addendum, and/or Phase II ESA/PEA) will be conducted prior to project construction for future, currently unknown project sites (**MM-HAZ-6**). If the ESA identifies potential environmental concerns, **MM-HAZ-1** through **MM-HAZ-5** would then be implemented as appropriate for the future site. The mitigation measures would reduce the potential impact resulting from potential contamination on future project sites. Therefore, the impacts would be reduced to less than significant.

##### *Operation*

New property acquisitions may be located on a site listed on a hazardous materials database. However, operation of new school or administrative facilities would not involve ground-disturbing activities. Thus, operations under this project category would not exacerbate existing hazardous conditions associated with being listed on a hazardous materials database and would not expose the public or the environment to hazardous materials.

#### Level of Significance Prior to Mitigation

##### *Construction*

**Impact-HAZ-1**: **Encounter Hazardous Materials During Construction at New Acquisition Sites.** Ground-disturbing construction activities at future, unknown sites may encounter soil, groundwater, or soil vapor contaminated with hazardous materials due to previous uses of the property, that are not listed on Table 4.8-2, which could result in a significant hazard to the public or the environment. This is a potentially significant impact.

***Operation***

Operation of new school or administrative facilities would not result in impacts associated with significant hazards to the public or the environment due to being located on a site that is listed on a hazardous materials database pursuant to Government Code Section 65962.5.

### Mitigation Measures

For **Impact-HAZ-1:**

Implement **MM-HAZ-1,** as described above.

### Level of Significance After Mitigation

***Construction***

In order to address potential future sites for new acquisition and new school or administrative facilities that are listed on a hazardous materials database (**Impact-HAZ-1**), an ESA (Phase I ESA, Phase I ESA Addendum, and/or Phase II ESA/PEA) will be conducted prior to project construction for future, currently unknown project sites (**MM-HAZ-1**). If the ESA identifies potential environmental concerns, **MM-HAZ-3** through **MM-HAZ-7** would then be implemented as appropriate for the future site. The mitigation measures would reduce the potential impact resulting from potential contamination on future project sites. Therefore, the impacts would be reduced to less than significant.

***Operation***

Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

## Whole Site Modernization; Upgrades of Existing School and Administrative Sites; and Joint Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

***Construction***

Many existing school and administrative sites have been listed on a hazardous materials database compiled pursuant to Government Code Section 65962.5. Table 4.8-2 contains a list of school sites that are listed on a hazardous materials database and have existing conditions that could result in a potential environmental concern (some sites listed on Table 4.8-2 have environmental concerns that have been identified in another way). For a comprehensive list of all school sites that are listed on a hazardous materials database, please see Appendix H of this PEIR. If a whole site modernization, upgrades of existing school and administrative site, or joint-use facilities project is proposed on site that is included in Table 4.8-2, then it is possible that ground-disturbing construction activity could encounter hazardous materials. Encountering hazardous materials during construction could result in the exposure of workers, the public, or the environment to hazardous materials (**Impact-HAZ-3**).

Whole site modernization, upgrades of existing school and administrative sites, and joint use facilities projects would have the potential to be located on a site listed on hazardous materials database, and to exacerbate existing hazardous conditions (**Impact-HAZ-3**). In order to address the

potential of exacerbating existing hazardous conditions, a Site Screening Memorandum will be prepared for future projects listed on a hazardous database (also included in Table 4.8-2) to identify if there would be existing contamination that could be encountered by proposed work (**MM-HAZ-3**). If contamination that may be encountered by proposed work is identified, a Site Characterization Report will be conducted (**MM-HAZ-4**). The Site Characterization Report will determine the location, type, and extent of the known or suspected onsite contamination, and if the scope of work for a future proposed project would be likely to encounter the onsite contamination. If it is determined the proposed project would encounter onsite contamination, a Soil Management Plan or Soil and Groundwater Management Plan (**MM-HAZ-5**) will be prepared to outline the appropriate measures associated with monitoring of the disturbed soil, soil and groundwater handling, stockpiling, characterization, onsite reuse, export, and disposal protocols. If a proposed project has been determined to be likely to encounter existing environmental hazards, a Worker Health and Safety Plan (**MM-HAZ-6**) and a Community Health and Safety Plan (**MM-HAZ-7**) will be prepared and implemented during construction activities to ensure workers onsite and the adjacent community are protected from exposure to potential environmental and health hazards. Implementation of **MM-HAZ-3** through **MM-HAZ-7** would ensure potential onsite contamination would be handled properly, and workers and the public would be protected from potential exposure to hazardous materials. The impact would be reduced to less than significant.

***Operation***

Existing school and administrative facilities may be located on a site listed on a hazardous materials database. However, operation of whole site modernization, upgrades of existing school and administrative sites, and joint use program projects would not involve ground-disturbing activities. Thus, operations of these project categories would not exacerbate existing hazardous conditions associated with being listed on a hazardous materials database and would not result in exposing the public or the environment to hazardous materials.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-HAZ-3: Encounter Hazardous Materials During Ground-Disturbing Activities.** Ground-disturbing construction activities at the existing District-owned sites listed in Table 4.8-2 may encounter soil or groundwater contaminated with hazardous materials, which could result in significant hazard to the public or the environment. This is a potentially significant impact.

***Operation***

Operation of new school or administrative facilities would not result in impacts associated with significant hazards to the public or the environment due to being located on a site that is listed on a hazardous materials database pursuant to Government Code Section 65962.5.

### Mitigation Measures

For **Impact-HAZ-3:**

Implement **MM-HAZ-3** through **MM-HAZ-7,** as described above.

### Level of Significance After Mitigation

#### *Construction*

Whole site modernization, upgrades of existing school and administrative sites, and joint use facilities projects would have the potential to be located on a site listed on a hazardous materials database, and to exacerbate existing hazardous conditions (**Impact-HAZ-3**). In order to address the potential of exacerbating existing hazardous conditions, a Site Screening Memorandum will be prepared for future projects listed on a hazardous database (also included in Table 4.8-2) to identify if there would be existing contamination that could be encountered by proposed work (**MM-HAZ-3**). If contamination that may be encountered by proposed work is identified, a Site Characterization Report will be conducted (**MM-HAZ-4**). The Site Characterization Report will determine the location, type, and extent of the known or suspected onsite contamination, and if the scope of work for a future proposed project would be likely to encounter the onsite contamination. If it is determined the proposed project would encounter onsite contamination, a Soil Management Plan or Soil and Groundwater Management Plan (**MM-HAZ-5**) will be prepared to outline the appropriate measures associated with monitoring of the disturbed soil, soil and groundwater handling, stockpiling, characterization, onsite reuse, export, and disposal protocols. If a proposed project has been determined to be likely to encounter existing environmental hazards, a Worker Health and Safety Plan (**MM-HAZ-6**) and a Community Health and Safety Plan (**MM-HAZ-7**) will be prepared and implemented during construction activities to ensure workers onsite and the adjacent community are protected from exposure to potential environmental and health hazards. Implementation of **MM-HAZ-3** through **MM-HAZ-7** would ensure potential onsite contamination would be handled properly, and workers and the public would be protected from potential exposure to hazardous materials. The impact would be reduced to less than significant.

#### *Operation*

Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

## Site-Specific Analysis

### Impact Discussion

#### Construction

Near-term, site-specific whole site modernization projects could be located on school sites listed on the Cortese List. Table 4.8-7 lists the school sites currently on the Cortese List. Ground-disturbing activities associated with near-term, site-specific whole site modernization projects would have the potential to encounter hazardous materials associated with Cortese List records. The potential to encounter and potentially release hazardous materials to the environmental could exacerbate existing conditions on these sites, which would represent a significant impact (**Impact-HAZ-3**).

The preparation of a Site Screening Memorandum (**MM-HAZ-3**)**,** Site Characterization Report (**MM-HAZ-4**), Soil Management Plan or Soil and Groundwater Management Plan (**MM-HAZ-5**), a Worker Health and Safety Plan (**MM-HAZ-6**), and a Community Health and Safety Plan (**MM-HAZ-7**) would reduce the significant impact associated with the encounter of known or suspected hazardous materials contamination (**Impact-HAZ-3**). Implementation of **MM-HAZ-3** through **MM-HAZ-7** would ensure onsite contamination would be handled properly, and workers and the public would

be protected from potential exposure to hazardous materials. The impact would be less than significant.

### Operation

Near-term, site-specific whole site modernization projects may be located on one of the school sites listed in Table 4.8-7. However, operation of the school sites after the near-term, site-specific whole site modernization projects have been completed would not involve ground-disturbing activities or any other activity that would be likely to encounter existing hazardous materials. Thus, operation of the near-term, site-specific whole site modernization projects would not exacerbate existing hazardous conditions associated with being listed on a hazardous materials database as part of the Cortese list, and would not result in exposing the public or the environment to hazardous materials.

## Level of Significance Prior to Mitigation

### Construction

**Impact-HAZ-3: Encounter Hazardous Materials During Ground-Disturbing Activities.** Ground-disturbing construction activities at the existing District-owned sites listed in Table 4.8-2 may encounter soil or groundwater contaminated with hazardous materials, which could result in significant hazard to the public or the environment. This is a potentially significant impact.

### Operation

Operations associated with near-term, site-specific whole site modernization projects would not exacerbate existing hazardous conditions associated with being listed on a hazardous materials database as part of the Cortese list, and would not result in a significant impact.

## Mitigation Measures

For **Impact-HAZ-3:**

Implement **MM-HAZ-3** through **MM-HAZ-7,** as described above.

## Level of Significance After Mitigation

### Construction

The preparation of a Site Screening Memorandum (**MM-HAZ-3**), Site Characterization Report (**MM-HAZ-4**), Soil Management Plan or Soil and Groundwater Management Plan (**MM-HAZ-5**), a Worker Health and Safety Plan (**MM-HAZ-6**), and a Community Health and Safety Plan (**MM-HAZ-7**) would reduce the significant impact associated with the encounter of known or suspected hazardous materials contamination (**Impact-HAZ-3**). Implementation of **MM-HAZ-3** through **MM-HAZ-7** would ensure onsite contamination would be handled properly, and workers and the public would be protected from potential exposure to hazardous materials. The impact would be less than significant.

### Operation

Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

***Threshold 5: Would the Proposed Program be located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard or excessive noise for people residing or working in the project area?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

***Construction***

It is possible that new acquisition and new school or administrative facilities projects would be proposed within an airport land use plan area. If such a site is within an airport overlay zone, the proposed project must abide by the requirements as established by the airport land use compatibility plan associated with the airport. Therefore, if the new acquisition or new school or administrative facility would be constructed within the FAA Notification overlay for a nearby airport, the project could result in a hazard to people living and working in the vicinity due to the increased height of a structure, height of a construction crane, or equipment that may interfere with air navigation facilities (**Impact-HAZ-7**). Any new construction project within the FAA Notification overlay would be required to submit the proposed project to the FAA for review and approval. Review Area 1 and Review Area 2 encapsulate the other airport overlay zones, as described in Section 4.8.2.3, *Proximity to Airports.* Schools that lie within Review Area 1 would be located within the 60 dB CNEL noise contour and all safety zones. Thus, any new acquisition and new school or administration facilities construction project that is located in Review Area 1 could impact the safety of the airspace surrounding the airport (**Impact-HAZ-8**). Projects would be required to comply with all of the regulations established by the ALUC for land use development projects in Review Area 1. All new acquisition and new school or administrative facilities projects located within Review Area 1 would be required to be submitted to the ALUC for review and approval.

New acquisition and new school or administrative facilities projects that are located within Review Area 2 are within the airspace protection and overflight boundaries. If new school or administrative facilities, or new acquisitions, propose height increases of structures, propose the use of construction cranes, or the use of equipment that may interfere with NAVAIDS, these projects could interfere with the use of navigable airspace surrounding the airport, and could interfere with the safe use of airspace by pilots and airport staff (**Impact-HAZ-9**).

In order to reduce this potentially significant impact, the District would be required to submit an application for the project for review and approval by the FAA (**MM-HAZ-9**). Likewise, proposed future projects may propose structures, or involve construction equipment, that could conflict with the regulations applicable to either Review Area 1 or Review Area 2 of an airport in the proposed project's vicinity, as established by the appropriate ALUCP (**Impact-HAZ-8** and **Impact-HAZ-9**). To ensure future projects that are located within the overlay for Review Area 1 or Review Area 2 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval (**MM-HAZ-10** and **MM-HAZ-11**). Implementation of **MM-HAZ-9, MM-HAZ-10,** and **MM-HAZ-11** would reduce the potential

significant impact related to exacerbating existing safety or noise hazards for people living or residing in the vicinity of the future project to less than significant.

***Operation***

The acquisition of a new property and operation of a new school or administrative facility in a location within Review Area 1, Review Area 2, or FAA Notification overlay, could introduce new students or staff to the area. This would thus introduce additional people to an area identified as having a potential airport hazard (**Impact-HAZ-7, Impact-HAZ-8,** and **Impact-HAZ-9**).

In order to reduce this potentially significant impact, the District would be required to submit an application for the project for the review and approval of the FAA (**MM-HAZ-9**). To ensure future projects that are located within the overlay for Review Area 1 or Review Area 2 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval (**MM-HAZ-10** and **MM-HAZ-11**). The implementation of **MM-HAZ-9, MM-HAZ-10,** and **MM-HAZ-11** would reduce the potential significant impact related to exacerbating existing safety or noise hazards for people living or residing in the vicinity of the future project to less than significant.

### Level of Significance Prior to Mitigation

***Construction and Operation***

**Impact-HAZ-7: Interfere with Federal Aviation Administration Communication.** Proposed projects located within the Federal Aviation Administration Notification overlay for nearby airports could introduce elements that could interfere with the safe operation of aircraft or air navigation facilities, due to the height of structures or construction equipment. This could result in a safety hazard for the people living or working within the vicinity of the proposed project site. This is a potentially significant impact.

**Impact-HAZ-8: Conflict with Regulations Applicable to Review Area 1.** Future proposed projects located within Review Area 1 for nearby airports could result in a conflict with Airport Land Use Compatibility Plan (ALUCP) regulations regarding land use projects in the vicinity of the airport. This could result in a safety hazard for the people living or working within the vicinity of the proposed project site. This is a potentially significant impact.

**Impact-HAZ-9: Conflict with Regulations Applicable to Review Area 2:** Future proposed projects located within Review Area 2 could propose structures, construction equipment, or other project elements that would conflict with Airport Land Use Compatibility Plan (ALUCP) regulations regarding land use projects within Review Area 2. This could result in a safety hazard for the people living or working within the vicinity of the airport. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HAZ-7:**

> **MM-HAZ-9. Ensure Federal Aviation Administration Notification of Proposed Construction or Alteration.** During project design, the District shall comply with the requirements of 14 Code of Federal Regulations 77 Notification Criteria for proposed construction or alteration of objects exceeding certain heights or that could potentially interfere with navigational aids by submitting Form 7460-1 to the Federal Aviation Administration (FAA)

for review and approval. Regardless of location, the District shall notify the FAA of proposed structures or objects (including construction cranes) exceeding 200 feet above ground level. If conditions of approval are issued by the FAA upon review, the District shall comply with all conditions.

For **Impact-HAZ-8**:

**MM-HAZ-10. Ensure Airport Land Use Commission Review and Approval for Review Area 1.** During project design, the District shall submit a consistency application for Airport Land Use Commission (ALUC) review for all projects located within Review Area 1. The ALUC shall make a consistency determination as to whether the project is compatible with Airport Land Use Compatibility Plan (ALUCP) noise and safety compatibility policies, and whether the project requires Federal Aviation Administration (FAA) review or is determined by the FAA not to be a hazard or obstruction to air navigation. The District shall include the FAA notice of determination (**MM-HAZ-9)** with the ALUC consistency application.

For **Impact-HAZ-9**:

**MM-HAZ-11: Ensure Airport Land Use Commission Review and Approval for Review Area 2.** Prior to project design, the District shall submit a consistency application for Airport Land Use Commission (ALUC) review for land use projects located within Review Area 2 if they propose increases in height limits compared to existing structures, or for projects that:

- Have received a Notice of Presumed Hazard, a Determination of Hazard, or a Determination of No Hazard subject to conditions, limitations, or marking and lighting requirements, from the Federal Aviation Administration (FAA); and/or
- Would create any of the following hazards:
  - Glare
  - Lighting
  - Electromagnetic interference
  - Dust, water vapor, and smoke
  - Thermal plumes
  - Bird attractants

### Level of Significance After Mitigation

#### *Construction*

Construction associated with new acquisition and new school administrative facilities projects could introduce new structures, higher building heights, construction cranes, or other equipment that could interfere with the safe navigation of airspace in the vicinity of an airport. If the proposed future project is within the FAA Notification overlay of an airport as established by the ALUCP, the project could conflict with FAA height regulations (**Impact-HAZ-7**). In order to reduce this potentially significant impact, the District would be required to submit an application for the project for the review and approval of the FAA (**MM-HAZ-9**). Likewise, proposed future projects may propose structures, or involve construction equipment, that could conflict with the regulations applicable to either Review Area 1 or Review Area 2 of an airport in the proposed project's vicinity,

as established by the appropriate ALUCP (**Impact-HAZ-8** and **Impact-HAZ-9**). To ensure future projects that are located within the overlay for Review Area 1 or Review Area 2 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval (**MM-HAZ-10** and **MM-HAZ-11**). The implementation of **MM-HAZ-9** through **MM-HAZ-11** would reduce the potential significant impact related to exacerbating existing safety or noise hazards for people living or residing in the vicinity of the future project to less than significant.

***Operation***

Operation of a new school site or administrative facility could introduce new students or staff to the area. This would thus introduce additional people to an area identified as having a potential airport hazard (**Impact-HAZ-7, Impact-HAZ-8,** and **Impact-HAZ-9**). In order to reduce this potentially significant impact, the District would be required to submit an application for the project for the review and approval of the FAA (**MM-HAZ-9**). To ensure future projects that are located within the overlay for Review Area 1 or Review Area 2 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval (**MM-HAZ-10** and **MM-HAZ-11**). The implementation of **MM-HAZ-9** through **MM-HAZ-11** would reduce the potential significant impact related to exacerbating existing safety or noise hazards for people living or residing in the vicinity of the future project to less than significant.

## Whole Site Modernization; Upgrades of Existing School and Administrative Sites; and Joint Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

***Construction***

As described in Section 4.8.2.2, many school sites are located within one or more airport overlay zones associated with several different airports in San Diego County. Table 4.8-4 lists each school in the District and the overlapping airport overlay zones. Proposed modernization projects, upgrade projects, or joint use facility projects at schools on these lists could introduce incompatible uses into the airspace surrounding the airport. The schools that lay within airport overlay zones must comply with the standards and policies outlined in the airport's ALUCP for each different overlay zone. Proposed projects at existing school and administrative sites that lie within the FAA Notification overlay (as listed in Table 4.8-4) have the potential to conflict with navigation or interfere with NAVAIDS, which could result in a safety hazard to people living or working within the area (**Impact-HAZ-7**). Likewise, school sites with proposed projects such as whole site modernization, upgrades of existing school and administrative sites, and joint use facilities, that are located within Review Area 1 (**Impact-HAZ-8**) or Review Area 2 (**Impact-HAZ-9**) could conflict with regulations applicable to either Review Area 1 or Review Area 2 established by the airport's ALUCP.

In order to reduce this potentially significant impact, the District would be required to submit an application for the project for the review and approval of the FAA (**MM-HAZ-9**). Likewise, projects may propose structures, or involve construction equipment, that could conflict with the regulations applicable to either Review Area 1 or Review Area 2 of an airport in the proposed project's vicinity, as established by the appropriate ALUCP (**Impact-HAZ-8** and **Impact-HAZ-9**). To ensure future projects that are located within the overlay for Review Area 1 or Review Area 2 for a nearby airport

would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval (**MM-HAZ-10** and **MM-HAZ-11**). The implementation of **MM-HAZ-9, MM-HAZ-10,** and **MM-HAZ-11** would reduce the potential significant impact related to exacerbating existing safety or noise hazards for people living or residing in the vicinity of the future project to less than significant.

***Operation***

The operation of the existing District-owned school or administration facilities would not involve any activities that would conflict with the safe and efficient use of airport airspace or the operation of air navigation equipment. Future whole site modernization, upgrades of existing school and administrative sites, and joint use facilities projects would not change the use of the site, nor would they introduce additional people to the school site. Future whole site modernization, upgrades of existing school and administrative sites, and joint use facilities would accommodate existing students and staff; they would not increase capacity or enrollment at any District school site. Therefore, all other project categories would not include activities that would change existing conditions at the District-owned school and administrative facilities, and would not exacerbate an existing safety or noise hazard related to a nearby airport for people living or working within the vicinity of the project area.

**Level of Significance Prior to Mitigation**

***Construction***

**Impact-HAZ-7: Interfere with Federal Aviation Administration Communication.** Proposed projects located within the Federal Aviation Administration Notification overlay for nearby airports could introduce elements that could interfere with the safe operation of aircraft or air navigation facilities, due to the height of structures or construction equipment. This could result in a safety hazard for the people living or working within the vicinity of the proposed project site. This is a potentially significant impact.

**Impact-HAZ-8: Conflict with Regulations Applicable to Review Area 1.** Future proposed projects located within Review Area 1 for nearby airports could result in a conflict with Airport Land Use Compatibility Plan (ALUCP) regulations regarding land use projects in the vicinity of the airport. This could result in a safety hazard for the people living or working within the vicinity of the proposed project site. This is a potentially significant impact.

**Impact-HAZ-9: Conflict with Regulations Applicable to Review Area 2:** Future proposed projects located within Review Area 2 could propose structures, construction equipment, or other project elements that would conflict with Airport Land Use Compatibility Plan (ALUCP) regulations regarding land use projects within Review Area 2. This could result in a safety hazard for the people living or working within the vicinity of the airport. This is a potentially significant impact.

***Operation***

Operations associated with whole site modernization, upgrades of existing school and administrative sites, and joint use facilities projects would not result in impacts associated with a safety hazard or excessive noise for people residing or working in the project area due to being located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or public use airport. Impacts would be less than significant.

### Mitigation Measures

For **Impact-HAZ-7:**

Implement **MM-HAZ-9,** as described above.

For **Impact-HAZ-8**:

Implement **MM-HAZ-10,** as described above.

For **Impact-HAZ-9**:

**MM-HAZ-11,** as described above.

### Level of Significance After Mitigation

#### *Construction*

Whole site modernization, upgrades of existing school and administrative sites, and joint use facilities projects could introduce new structures, higher building heights, construction cranes, or other equipment onto a site that could interfere with the safe navigation of airspace in the vicinity of an airport. If the proposed future project is within the FAA Notification overlay of an airport as established by the ALUCP, the project could conflict with FAA height regulations (**Impact-HAZ-7**). In order to reduce this potentially significant impact, the District would be required to submit an application for the project for the review and approval of the FAA (**MM-HAZ-9**). Likewise, future projects may propose structures, or involve construction equipment, that could conflict with the regulations applicable to either Review Area 1 or Review Area 2 of an airport in the proposed project's vicinity, as established by the appropriate ALUCP (**Impact-HAZ-8** and **Impact-HAZ-9**). To ensure future projects that are located within the overlay for Review Area 1 or Review Area 2 for a nearby airport would not conflict with safety regulations, the District would submit an application for the project to the ALUC for review and approval (**MM-HAZ-10** and **MM-HAZ-11**). The implementation of **MM-HAZ-9** through **MM-HAZ-11** would reduce the potential significant impact related to exacerbating existing safety or noise hazards for people living or residing in the vicinity of the future project to less than significant.

### Operation

Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

## Site-Specific Analysis

## Impact Discussion

### Construction

Some school sites identified for near-term, site-specific whole site modernization projects are located within one or more airport overlay zones associated with the regional airports in San Diego County. Table 4.8-8 lists the schools proposed for near-term, site-specific whole site modernization projects that are located within, or partially within, an airport overlay zone. These projects could involve substantial redevelopment, including the construction of new classroom buildings or athletic facilities, that could introduce new incompatible uses into the airspace surrounding the San Diego County airports. The schools that are situated in airport overlay zones would be required to

comply with the standards and policies established in the applicable airport's ALUCP. Different standards and policies may apply for each overlay zone for different airports. Proposed near-term, site-specific whole site modernization projects at the schools listed in Table 4.8-8 that are identified as being within the FAA Notification overlay have the potential to conflict with navigation or interfere with NAVAIDS, which could result in a safety hazard to people living or working within the area (**Impact-HAZ-7**). Likewise, proposed near-term, site-specific whole site modernization activities at the school sites that are listed as located within Review Area 1 (**Impact-HAZ-8**) or Review Area 2 (**Impact-HAZ-9**) could result in a safety hazard to people living or working within the area.

Implementation of **MM-HAZ-9** would be required, which would include the submittal of an application for the review and approval of the FAA and reduce the impact associated with being located in the FAA Notification overlay zone of an airport (**Impact-HAZ-7**). Proposed projects that may conflict with either the Review Area 1 or Review Area 2 overlay zones (**Impact-HAZ-8** and **Impact-HAZ-9**) would be required to submit an application for the project to the ALUC for review and approval (**MM-HAZ-10** and **MM-HAZ-11**). The implementation of **MM-HAZ-9, MM-HAZ-10,** and **MM-HAZ-11** would reduce the potential significant impact related to exacerbating existing safety or noise hazards for people living or residing in the vicinity of the future project to less than significant.

**Table 4.8-8. Near-Term, Site-Specific Whole-Site Modernization Projects within Airport Overlay Zones**

| | Airport Land Use Overlay Zone | | | | |
|---|---|---|---|---|---|
| **School Site or District Facilities** | **Review Area 1** | **Review Area 2** | **FAA Notification[1]** | **Air Noise Contours** | **Air Overflight** |
| **Clairemont Cluster** | | | | | |
| Clairemont HS | N/A | Montgomery | N/A | N/A | N/A |
| **Crawford Cluster** | | | | | |
| Oak Park ES | N/A | Lindbergh | N/A | N/A | N/A |
| **Henry Cluster** | | | | | |
| Lewis MS | N/A | Montgomery | N/A | N/A | Montgomery |
| **Hoover Cluster** | | | | | |
| Rowan ES | N/A | Lindbergh | Yes | N/A | Lindbergh |
| **Lincoln Cluster** | | | | | |
| Baker ES | N/A | Lindbergh | N/A | N/A | Lindbergh |
| Valencia Park ES | Lindbergh | N/A | N/A | Lindbergh 60 dB | Lindbergh |
| **Madison Cluster** | | | | | |
| Madison HS | Miramar; Montgomery | Miramar; Montgomery | N/A | Miramar and Montgomery 60 dB | Montgomery |
| **Morse Cluster** | | | | | |
| Boone ES | N/A | Lindbergh | N/A | N/A | Lindbergh |
| Fulton K–8 | N/A | Lindbergh | N/A | N/A | Lindbergh |
| **Point Loma Cluster** | | | | | |
| Correia MS | Lindbergh | N/A | Yes | Lindbergh 60 dB and 65 dB | Lindbergh |

| School Site or District Facilities | Airport Land Use Overlay Zone Review Area 1 | Review Area 2 | FAA Notification[1] | Air Noise Contours | Air Overflight |
|---|---|---|---|---|---|
| **San Diego Cluster** | | | | | |
| Perkins K–8 | N/A | Lindbergh | N/A | N/A | N/A |
| Roosevelt International MS | N/A | Lindbergh | Yes | N/A | N/A |

### Operation

The proposed near-term, site-specific whole site modernization projects would not change the operation of these sites or introduce additional people to the school site after the modernization activities are complete. The projects would be intended to accommodate existing student populations and would not increase capacity or enrollment at the specific school sites. The operation of these school sites would not involve any activities that would conflict with the safe and efficient use of airspace surrounding the airports or the operation of air navigation equipment. Therefore, proposed near-term, site-specific whole site modernization projects would not change existing conditions at these sites in such a way that would exacerbate any existing safety or noise hazards related to being located within an airport overlay zone.

## Level of Significance Prior to Mitigation

### Construction

**Impact-HAZ-7: Interfere with Federal Aviation Administration Communication.** Proposed projects located within the Federal Aviation Administration Notification overlay for nearby airports could introduce elements that could interfere with the safe operation of aircraft or air navigation facilities, due to the height of structures or construction equipment. This could result in a safety hazard for the people living or working within the vicinity of the proposed project site. This is a potentially significant impact.

**Impact-HAZ-8: Conflict with Regulations Applicable to Review Area 1.** Future proposed projects located within Review Area 1 for nearby airports could result in a conflict with Airport Land Use Compatibility Plan (ALUCP) regulations regarding land use projects in the vicinity of the airport. This could result in a safety hazard for the people living or working within the vicinity of the proposed project site. This is a potentially significant impact.

**Impact-HAZ-9: Conflict with Regulations Applicable to Review Area 2:** Future proposed projects located within Review Area 2 could propose structures, construction equipment, or other project elements that would conflict with Airport Land Use Compatibility Plan (ALUCP) regulations regarding land use projects within Review Area 2. This could result in a safety hazard for the people living or working within the vicinity of the airport. This is a potentially significant impact.

### Operation

Implementation of near-term, site-specific whole site modernization projects would not result in potentially significant impacts.

## Mitigation Measures

For **Impact-HAZ-7:**

Implement **MM-HAZ-9,** as described above.

For **Impact-HAZ-8:**

Implement **MM-HAZ-10,** as described above.

For **Impact-HAZ-9:**

Implement **MM-HAZ-11,** as described above.

## Level of Significance After Mitigation

### Construction

Implementation of **MM-HAZ-9**, which would include the submittal of an application for the review and approval of the FAA, would reduce the impact associated with being located in the FAA Notification overlay zone of an airport (**Impact-HAZ-7**). Proposed projects that may conflict with either the Review Area 1 or Review Area 2 overlay zones (**Impact-HAZ-8** and **Impact-HAZ-9**) shall submit an application for the project to the ALUC for review and approval (**MM-HAZ-10** and **MM-HAZ-11**). The implementation of **MM-HAZ-9** through **MM-HAZ-11** would reduce the potential significant impact related to exacerbating existing safety or noise hazards for people living or residing in the vicinity of the future project to less than significant.

### Operation

Impacts were determined to be less than significant prior to mitigation. No mitigation is required.

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Section 4.9
# Hydrology and Water Quality

## 4.9.1 Overview

This section describes the existing conditions and applicable laws and regulations for hydrology and water quality, followed by an analysis of the Proposed Program's potential to: (1) violate water quality standards or waste discharge requirements or otherwise degrade water quality, (2) decrease groundwater supplies or interfere with groundwater recharge that may impede sustainable groundwater management; (3a) result in substantial erosion or siltation; (3b) result in flooding on- or off site; (3c) 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; (3d) impede or redirect flood flows; (4) in flood hazards, tsunami, or seiche zones, risk release of pollutants due to inundation; and (5) conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Table 4.9-1 summarizes the significant impacts and mitigation measures (MMs) discussed in Section 4.9.4.3, *Impacts and Mitigation Measures*.

**Table 4.9-1. Summary of Significant Hydrology and Water Quality Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact-HWQ-1:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of New School or Administrative Facilities. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction best management practices (BMPs), which would reduce impacts. |
| **Impact-HWQ-2:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of New School or Administrative Facilities. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific low-impact development (LID) features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-HWQ-7:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of New Acquisition and New School or Administrative Facilities. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction BMPs, which would reduce impacts. |
| **Impact-HWQ-8:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of New Acquisition and New School or Administrative Facilities. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |
| **Impact-HWQ-13:** Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Construction of New School or Administrative Facilities. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction BMPs, which would reduce impacts. |
| **Impact-HWQ-14:** Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of New School or Administrative Facilities. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |
| **Impact-HWQ-18:** Potential for New School and Administrative Facilities to 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 During Construction. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction BMPs, which would reduce impacts. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-HWQ-19:** Potential for New School and Administrative Facilities to 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 During Operation. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |
| **Whole Site Modernization** | | | |
| **Impact-HWQ-3:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of Whole Site Modernization Projects. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction BMPs, which would reduce impacts. |
| **Impact-HWQ-4:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of Whole Site Modernization Projects. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |
| **Impact-HWQ-9:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of Whole Site Modernization Projects. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction BMPs, which would reduce impacts. |
| **Impact-HWQ-10:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of Whole Site Modernization Projects. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | receiving waters, which would reduce impacts. |
| **Impact-HWQ-15:** Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Construction of Whole Site Modernization Projects. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction BMPs, which would reduce impacts. |
| **Impact-HWQ-16:** Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of Whole Site Modernization Projects. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |
| **Impact-HWQ-20:** Potential for Whole Site Modernization Projects to 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 During Construction. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction BMPs, which would reduce impacts. |
| **Impact-HWQ-21:** Potential for Whole Site Modernization Projects to 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 During Operation. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |
| **Upgrades of Existing School and Administrative Sites** | | | |
| All impacts identified for Upgrades of Existing School and Administrative | No mitigation is required. | Less than Significant | N/A |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| Sites were less than significant. | | | |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| **Impact-HWQ-5:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of Joint-Use Facilities. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction BMPs, which would reduce impacts. |
| **Impact-HWQ-6:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of Joint-Use Facilities. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |
| **Impact-HWQ-11:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of Joint-Use Facilities. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction BMPs, which would reduce impacts. |
| **Impact-HWQ-12:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of Joint-Use Facilities. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |
| **Impact-HWQ-17:** Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of Joint-Use Facilities. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-HWQ-22:** Potential for Joint-Use Facilities to 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 During Construction. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction BMPs, which would reduce impacts. |
| **Impact-HWQ-23:** Potential for Joint-Use Facilities to 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 During Operation. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| **Impact-HWQ-3:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of Whole Site Modernization Projects. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction BMPs, which would reduce impacts. |
| **Impact-HWQ-4:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of Whole Site Modernization Projects. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |
| **Impact-HWQ-9:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of Whole Site Modernization Projects. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | construction BMPs, which would reduce impacts. |
| **Impact-HWQ-10:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of Whole Site Modernization Projects. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |
| **Impact-HWQ-15:** Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Construction of Whole Site Modernization Projects. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction BMPs, which would reduce impacts. |
| **Impact-HWQ-16:** Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of Whole Site Modernization Projects. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |
| **Impact-HWQ-20:** Potential for Whole Site Modernization Projects to 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 During Construction. | **MM-HWQ-1:** Implement Construction Best Management Practices. | Less than Significant | Implementation of **MM-HWQ-1** would require erosion control, sediment control, non-stormwater management, and waste management construction BMPs, which would reduce impacts. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-HWQ-21:** Potential for Whole Site Modernization Projects to 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 During Operation. | **MM-HWQ-2**: Implement Low Impact Development Features and Post-Construction Best Management Practices. | Less than Significant | Implementation of site-specific LID features and pollutants control BMPs would filter potential pollutants from runoff prior to discharge into receiving waters, which would reduce impacts. |

# 4.9.2 Existing Conditions

## 4.9.2.1 Surface Water Hydrology

The Proposed Program is within the jurisdiction of the San Diego Regional Water Quality Control Board (RWQCB). The San Diego region is divided into 11 hydrologic units (HUs) for administrative purposes. Each of the HUs flows from elevated regions in the east to lagoons, estuaries, or bays in the west and have similar water quality characteristics and issues. The Proposed Program is within the following HUs: Peñasquitos (906.00), San Diego (907.00), Pueblo San Diego (908.00), Sweetwater (909.00), and San Diego Bay (912.00) (City of San Diego 2008). Figure 4.9-1 shows each HU.

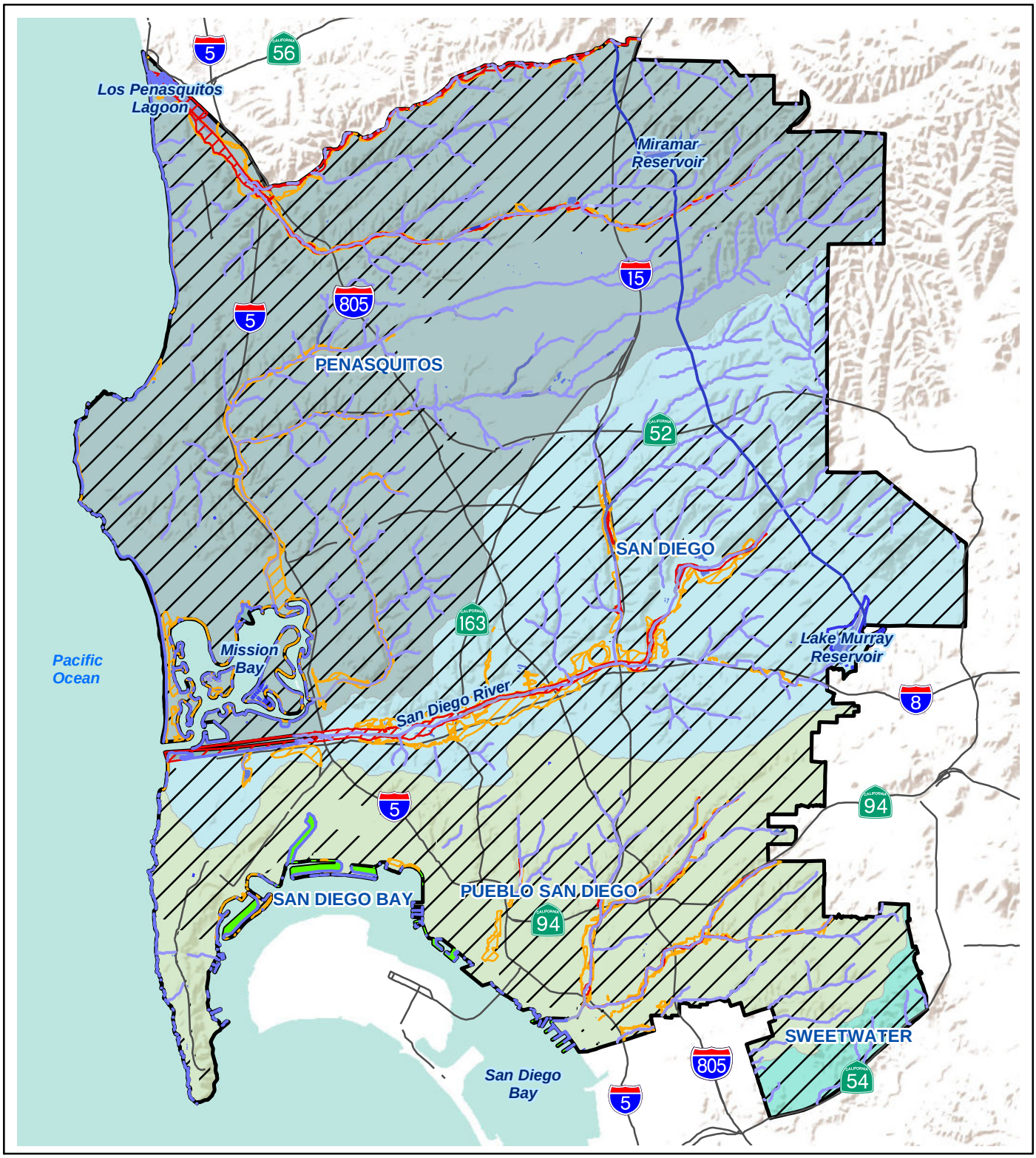
### Watersheds

Watersheds are land areas that funnel water to a common low point—usually a stream, lake, or river—or out to the ocean. When it rains, water flows down from areas of higher elevation following the natural shape of the land. Along the way, rainwater and urban runoff collect and deposit trash, sediment, heavy metals, fertilizers, pesticides, and other pollutants into local waterways. These pollutants degrade water quality.

The Proposed Program is within the following watersheds: Los Peñasquitos, Mission Bay and La Jolla, San Diego Bay, and San Diego River (City of San Diego 2019a).

#### Los Peñasquitos Watershed

The Los Peñasquitos watershed begins in the foothills east of State Route (SR-) 67 and funnels rainwater west through the communities of Poway, Scripps Ranch, Mira Mesa, Sorrento Valley, Carmel Valley, and Del Mar. The watershed eventually drains into the Pacific Ocean just north of Torrey Pines State Park at the mouth of the Los Peñasquitos Lagoon. Carmel Creek, Los Peñasquitos Creek, and Carroll Creek are the main tributaries draining into the Los Peñasquitos Lagoon (City of San Diego 2019). The lagoon's ecosystem supports diverse native fauna and flora and is especially sensitive to the effects of pollutants.




**Legend**

SDUSD Boundary

Watershed
- Penasquitos
- Pubelo San Diego
- San Diego
- San Diego Bay
- Sweetwater

Floodplain
- Area of Minimal Flood Hazard
- 0.2% Annual Chance Flood Hazard
- Floodway

National Hydrography Dataset (NHD)
- LakePond
- Reservoir
- SwampMarsh
- ArtificialPath
- CanalDitch
- Coastline
- Connector
- Pipeline
- StreamRiver
- Underground Conduit

Source:SanGIS (2019); ESRI

0 2.5 5 Miles

N

ICF

**Figure 4.9-1**
**Water Resources**

### Mission Bay and La Jolla Watersheds

Mission Bay and La Jolla watersheds drain an area of approximately 67 square miles all within the City of San Diego. The northern portions of the watersheds are home to the Marine Corps Air Station Miramar and the University of California, San Diego. Residential areas dominate the central portion of these watersheds and include the communities of Clairemont, Bay Park, University City, La Jolla, and Pacific Beach. Mission Bay Park, in the southwest corner of the watersheds, is the receiving water for a number of urban waterways, including San Clemente Creek, Rose Creek, and Tecolote Creek. The coastline along Pacific Beach and La Jolla are home to four Marine Protected Areas, two Areas of Biological Significance, and the San Diego-La Jolla Underwater Park (City of San Diego 2019).

### San Diego Bay Watershed

San Diego Bay watershed encompasses approximately 442 square miles and begins northeast of Descanso along SR-79 near Cuyamaca Rancho State Park. The watershed flows west through the unincorporated communities of Alpine, Jamul, and Dulzura and continues toward the San Diego Bay through the Cities of La Mesa, Lemon Grove, San Diego, National City, Chula Vista, Imperial Beach, and Coronado. Sweetwater River is the major waterway within this watershed, travelling 55 miles from its headwaters until it empties into the middle of San Diego Bay near SR-54 (between National City and Chula Vista) (City of San Diego 2019).

### San Diego River Watershed

San Diego River watershed begins near Santa Ysabel in the mountains of east San Diego County and funnels rainwater west to the El Capitan Reservoir, and through Lakeside, Santee, and Mission Valley. The river eventually drains into the Pacific Ocean in Ocean Beach. The San Diego River watershed encompasses approximately 433 square miles and connects portions of the cities of San Diego, El Cajon, La Mesa, Poway, and Santee (City of San Diego 2019). The Famosa Slough and river estuary at the western end of the watershed are extremely productive coastal wetlands. Despite its vast area, the river's ecosystem has become fragile in many places due to encroaching development and alterations of the river's natural course.

## 4.9.2.2 Surface and Stormwater Drainage

Storm drains collect rainwater to help prevent flooding in communities. The storm drain system includes a vast network of underground pipes and open channels that take water away from streets and other developed areas. Water enters the storm drain system through an opening in the curb called a *curb inlet.* Curb inlets serve as the neighborhood entry point for storm waters. Water in the storm drain system receives no treatment or filtering and is separate from the sewer system. All water in the storm drain system eventually flows to our rivers, creeks, bays, and the ocean – along with the pollutants it carries. A map of the City's storm drain network is included in Appendix III of the City's Jurisdictional Runoff Management Program (JRMP) and displays the City's current storm drain system data, which includes known pipes, channels, inlets, outlets, and other types of storm drain system conveyances and structures (City of San Diego 2015). The City's geographic information system (GIS) storm drain system data includes both the City's storm drain infrastructure and that belonging to other agencies or private parties that connects into the City's system. The City has more than 39,000 storm drain structures and over 900 miles of storm drains

and channels serving approximately 237 square miles of urbanized development (City of San Diego 2018).

# 4.9.2.3 Surface Water Quality

## Watersheds

### Los Peñasquitos Watershed

Within the Los Peñasquitos watershed, the pollutants are sourced primarily from urban runoff, sewage spills, dredging, and landfill leachate. Under Section 303(d) of the Clean Water Act (CWA), several waterbodies within the Los Peñasquitos watershed were identified as impaired, including Los Peñasquitos Creek, Los Peñasquitos Lagoon, and Pacific Ocean Shoreline. The Pacific Ocean Shoreline was identified as impaired for indicator bacteria, which is required to be addressed through a number of best management practices (BMPs) and regular monitoring. Sedimentation and siltation also poses a problem for the lagoon. (Project Clean Water 2019a)

### Mission Bay and La Jolla Watersheds

Urban runoff, sewage spills, dredging, and landfill leachate are considered the major sources impacting beneficial uses (see Table 4.9-2) in the Mission Bay and La Jolla watershed. Under Section 303(d) of the CWA, Tecolote Creek and the Pacific Ocean Shoreline were identified as impaired for coliform bacteria, which is required to be addressed through a number of BMPs and regular monitoring. (Project Clean Water 2019b)

### San Diego Bay Watershed

The most significant sources of pollutants impacting the San Diego Bay watershed are urban and agricultural runoff, resource extraction, septic systems, and marinas and boating activities. The creeks in the watershed are highly impacted by urban runoff, and several creeks that discharge into San Diego Bay are listed as 303(d)-impaired waterbodies for bacteria, various trace metals, and aquatic toxicity. Five sites in San Diego Bay that are impacted by runoff from the Pueblo San Diego hydrologic unit have been identified as hot spots by California's Bay Protection Toxic Cleanup Program. (Project Clean Water 2019c)

### San Diego River Watershed

Sources of pollutants within the San Diego River watershed include urban and agricultural runoff, mining operations, and sewage spills. Under Section 303(d) of the CWA, the Lower San Diego River watershed was identified as impaired for coliform bacteria. This condition is required to be addressed through a number of BMPs and regular monitoring. Several of the waterbodies are listed as impaired: Alvarado Creek, Lower San Diego River, Forester Creek, and Lake Murray. These waterbodies are impacted by pollutants such as fecal coliform, enterococcus, selenium, nitrogen, manganese, phosphorus, total dissolved solids, and low dissolved oxygen. (Project Clean Water 2019d)

## Beneficial Uses

The San Diego RWQCB, which establishes region-wide and waterbody-specific beneficial uses, has set numeric and narrative water quality objectives for several pollutants as well as parameters for specific surface waters in its region. When excessive quantities of pollutants are deposited into waterbodies, they may inhibit many or all of the designated beneficial uses and can result in actions such as beach closures and postings. The beneficial uses for surface waters in the Proposed Program area are described in Table 4.9-2.

**Table 4.9-2. Beneficial Uses for Watersheds with the Potential to Be Affected by Program**

| Watershed | Designated Beneficial Uses |
|---|---|
| Los Peñasquitos (inland surface water, coastal water, reservoirs, lakes, and groundwater) | agricultural supply (AGR); aquaculture (AQUA); biological habitats of special significance (BIOL); cold freshwater habitat (COLD); commercial and sport fishing (COMM); contact recreation (REC-1); estuarine habitat (EST); hydrogen power (POW); industrial service supply (PROC); marine habitat (MAR); migration of aquatic organisms (MIGR); municipal and domestic supply (MUN); navigation (NAV); non-contact recreation (REC-2); rare, threatened, or endangered species (RARE); shell fish harvesting (SHELL); spawning, reproduction and/or early development (SPWN); warm freshwater habitat (WARM); and wildlife habitat (WILD). |
| Mission Bay and La Jolla (inland surface water, coastal water, reservoirs, lakes, and groundwater) | agricultural supply (AGR); aquaculture (AQUA); biological habitats of special significance (BIOL); cold freshwater habitat (COLD); commercial and sport fishing (COMM); contact recreation (REC-1); estuarine habitat (EST); hydrogen power (POW); industrial service supply (PROC); industrial process supply (PRO); marine habitat (MAR); migration of aquatic organisms (MIGR); municipal and domestic supply (MUN); navigation (NAV); non-contact recreation (REC-2); rare, threatened, or endangered species (RARE); shell fish harvesting (SHELL); spawning, reproduction and/or early development (SPWN); warm freshwater habitat (WARM); and wildlife habitat (WILD). |
| San Diego Bay (inland surface water, coastal water, reservoirs, lakes, and groundwater) | agricultural supply (AGR); biological habitats of special significance (BIOL); cold freshwater habitat (COLD); commercial and sport fishing (COMM); contact recreation (REC-1); estuarine habitat (EST); hydrogen power (POW); industrial service supply (PROC); industrial process supply (PRO); marine habitat (MAR); migration of aquatic organisms (MIGR); municipal and domestic supply (MUN); navigation (NAV); non-contact recreation (REC-2); rare, threatened, or endangered species (RARE); shell fish harvesting (SHELL); spawning, reproduction and/or early development (SPWN); warm freshwater habitat (WARM); and wildlife habitat (WILD). |
| San Diego River (inland surface water, coastal water, reservoirs, lakes, and groundwater) | agricultural supply (AGR); aquaculture (AQUA); biological habitats of special significance (BIOL); cold freshwater habitat (COLD); commercial and sport fishing (COMM); contact recreation (REC-1); estuarine habitat (EST); hydrogen power (POW) industrial service supply (PROC); industrial process supply (PRO); marine habitat (MAR); migration of aquatic organisms (MIGR); Municipal and domestic supply (MUN); navigation (NAV); non-contact recreation (REC-2); rare, threatened, or endangered species (RARE); shell fish harvesting (SHELL); spawning, reproduction and/or early development (SPWN); warm freshwater habitat (WARM); and wildlife habitat (WILD). |

Source: Project Clean Water 2019a–2019d.

## Total Maximum Daily Load Impairments

CDW Section 303(d) requires that states maintain a list of waters not attaining standards after technology-based limits are put into place (see discussion of the CWA under Section 4.9.3.1, *Federal Regulations*). For waters on this list, states must develop a total maximum daily load (TMDL), which is a calculation of the loading capacity of a specific pollutant that can be assimilated by a waterbody without impairing its designated beneficial uses. Table 4.9-3 lists CWA Section 303(d)-listed receiving waterbodies and associated pollutant impairments for the major receiving waterbodies in the Proposed Program area; this list is not inclusive of all smaller listed waterbodies.

**Table 4.9-3. 303(d)-Listed Impairments for Waterbodies within the Proposed Program Area**

| Waterbody | 303(d)-Listed Impairments | TMDL Completion Date |
|---|---|---|
| Los Penasquitos Creek | Benthic Community Effects, Indicator Bacteria, Chlorpyrifos, Bifenthrin, TDS (total dissolved solids), Phosphate, Total Nitrogen as N, Toxicity | 2005 |
| Los Penasquitos Lagoon | Sedimentation, Siltation<br>Toxicity | Approved 2014<br>2005 |
| Carroll Canyon | Benthic Community Effects, Toxicity | 2005 |
| Soledad Canyon | Sediment Toxicity, Selenium | 2005 |
| Rose Creek | Benthic Community Effects, Selenium, Toxicity | 2005 |
| Mission Bay | Mercury, PCBs (polychlorinated biphenyls) | 2005 |
| Tecolote Creek | Indicator Bacteria<br>Benthic Community Effects, Bifenthrin, Cadmium, Copper, Cypermethrin, Diazinon, Lead, Nitrogen, Phosphorus, Selenium, Toxicity, Turbidity, Zinc | Approved 2011<br>2005 |
| Lower San Diego River | Indicator Bacteria<br>Benthic Community Effects, Cadmium, Dissolved Oxygen, Nitrogen, Phosphorus, TDS, Aquatic Toxicity | Approved 2011<br>2005 |
| San Diego Bay | Mercury, PAHs (polycyclic aromatic hydrocarbons), PCBs | 2005 |
| Famosa Slough and Channel | Eutrophic | 2005 |
| Switzer Creek | Copper, lead, zinc | 2005 |
| San Diego Bay Shoreline | Enterococcus, Fecal Coliform, Total Coliform, Copper, Benthic Community Effects, Sediment Toxicity, Toxicity, Chlordane, PAHs | |
| Chollas Creek | Indicator Bacteria<br>Diazinon<br>Bifenthrin, Chlorpyrifos, Cypermethrin, Malathion, Nitrogen, Phosphorus, Trash,<br>Copper, Lead, Zinc | Approved 2011<br>Approved 2003<br>2005<br><br>Approved 2008 |
| Alvarado Creek | Nitrogen, Selenium | 2005 |
| Forester Creek | Indicator Bacteria<br>Benthic Community Effects, Nitrogen, Phosphorus, Selenium, TDS | Approved 2011<br>2005 |
| Paleta Creek | Copper, Lead | 2005 |

Source: SWRCB 2017.

### 4.9.2.4 Groundwater

Groundwater is the water found underground in the cracks and spaces in soil, sand, and rock. It is stored in and moves slowly through geologic formations of soil, sand, and rocks called aquifers. For the most part, groundwater within the region occurs in alluvial aquifers, residuum (crystalline bedrock that has weathered in place), aquifers composed of semi-consolidated or consolidated sediments, and fractured crystalline rock. Sources of groundwater recharge in the region include creeks, precipitation, discharges from treatment plants, underflow from dams, and return flow.

There are several groundwater basins in the region to which the City of San Diego has rights, concerns, and jurisdiction, along with an interest in developing for municipal supply or other beneficial use (City of San Diego 2016). The Proposed Program area is underlain by the Coastal Plain of San Diego and Mission Valley Basin, as shown on Figure 4.9-2.

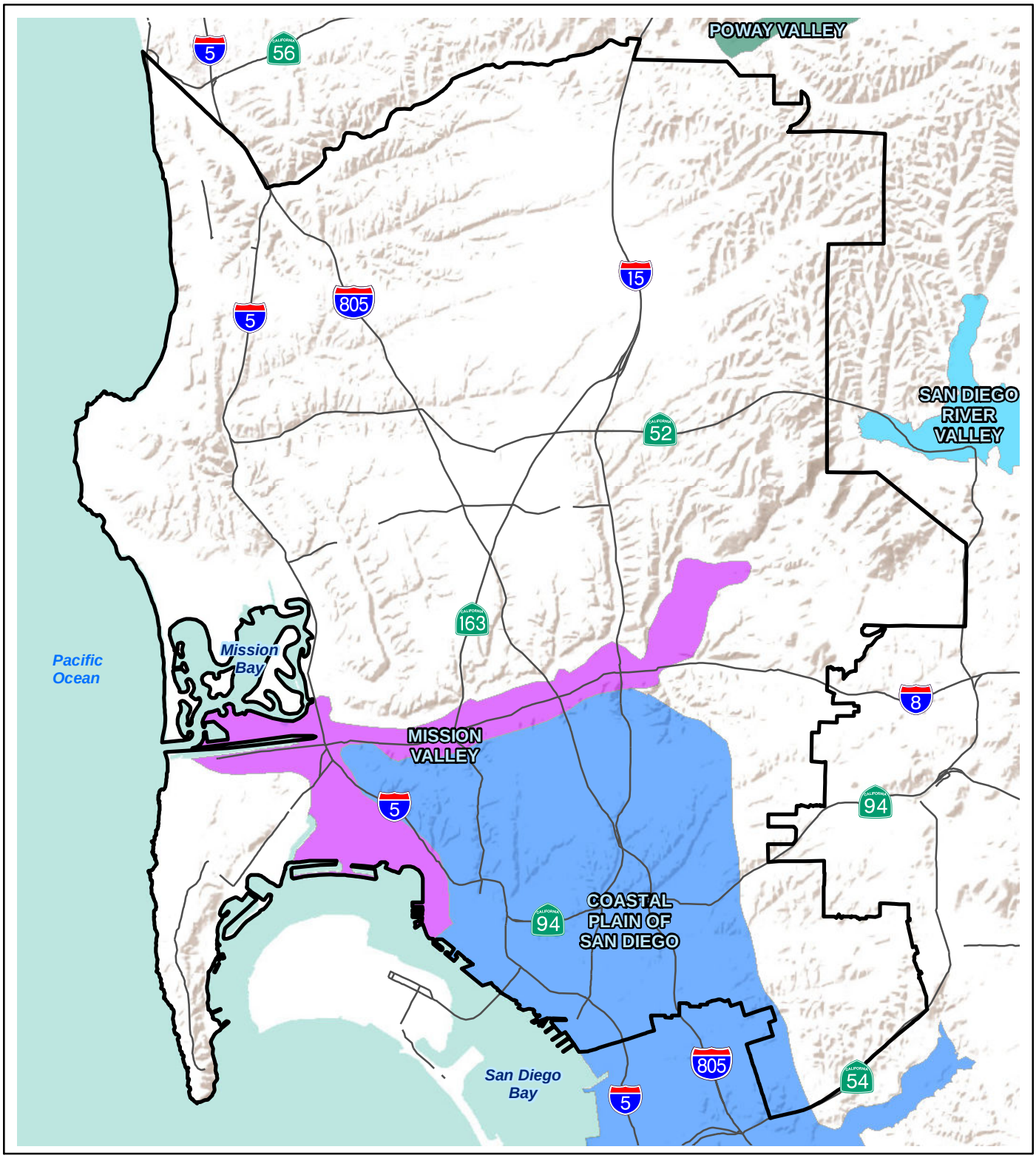
The Coastal Plain of San Diego groundwater basin boundary represents the area underlain by the San Diego Formation. The basin is bound on the west by San Diego Bay and the Pacific Ocean; on the south by the international border with Mexico; on the north by the alluvium of the Mission Valley Basin; and on the east by the La Nacion fault and the lateral extents of the San Diego Formation and the alluvial areas in Otay Valley and Sweetwater Valley. The surface waters are drained westerly towards the Pacific Ocean by the Sweetwater River, the Otay River, the Tijuana River, and various creeks (DWR 2018).

The Mission Valley Groundwater Basin underlies an east-west trending valley, which is drained by the San Diego River. The basin is bounded by the contacts of alluvium with the semi-permeable Coastal Plain of San Diego. The southwestern boundary is the San Diego Bay. The primary source of recharge for this basin is infiltration of stream flow from the San Diego River (DWR 2004).

### 4.9.2.5 Flood Hazards

The Federal Emergency Management Agency (FEMA) has mapped zones of anticipated flooding using base flood elevations for 100-year flood events, as presented on the agency's Flood Insurance Rate Maps (FIRMs). Areas that are subject to 100-year flood events within the Proposed Program area are identified as 1 percent Annual Chance Flood Hazard Zones; moderate flood hazard areas are between the base flood and 500-year flood and identified as 0.2 percent Annual Chance Flood Hazard Zones, as shown on Figure 4.9-1.

Stormwater runoff from heavy storms periodically causes flooding damage. San Diego's semi-arid climate makes it more susceptible to flooding because of local soil and vegetation characteristics. While the City's numerous canyons and valleys comprise an efficient natural drainage system that results in a low ratio of floodplain area to total land area there are areas that experience flooding during heavy rains such as in the case of the San Diego River Valley. Flood control has been addressed in the City both through engineered flood control channels as well as floodplain and open space zones that restrict development and protect from residents and property from flood hazards (City of San Diego 2008).




**Legend**

- SDUSD Boundary
- Groundwater Basins
  - Coastal Plain of San Diego
  - Mission Valley
  - Poway Valley
  - San Diego River Valley

Source:SanGIS (2019); ESRI

0 2.5 5 Miles

N

**Figure 4.9-2**
**Groundwater Basins**

### 4.9.2.6 Storm Surges, Tsunamis, and Seiches

A tsunami is a series of traveling ocean waves of great length and long period, which are generated by disturbances associated with earthquakes in oceanic and coastal regions. The City of San Diego is adjacent to the Pacific Coast and San Diego Bay. Small portions of the coast along the City are within designated tsunami hazard zones (Department of Conservation 2009). However, the existing schools within the Proposed Program area are not located within a tsunami zone. Major waterbodies are exposed to more flux in tides and therefore may have an increased risk of flooding from storm surges during a 100-year flooding event, and there is one school located near San Diego Bay that could potentially be inundated from storm surges in the Bay. In February 27, 2010, an earthquake off the Chilean coast generated tsunami waves and triggered a Tsunami Advisory for San Diego County and the entire California coast (City of San Diego 2019b). The tsunami waves reached the coast of San Diego in the afternoon, causing perceptible and rapid tidal "draw backs" and surges, and unusual currents. While San Diego County did not experience significant inundation or damage as a result of these waves, the event serves as a reminder that tsunamis are a threat to the San Diego region (City of San Diego 2019b).

A seiche is an oscillation of a body of water. Seiches occur most frequently in enclosed or semi-enclosed basins such as lakes, bays, or harbors and may be triggered by strong winds, changes in atmospheric pressure, earthquakes, tsunami, or tides. Portions of the Proposed Program area are adjacent to a lagoon, reservoirs, Mission Bay, and San Diego Bay, which are semi-enclosed waterbodies, as shown on Figure 4.9-1.

## 4.9.3 Applicable Laws and Regulations

This section provides an overview of pertinent federal, state, and local policies governing hydrology and water quality for the Proposed Program.

### 4.9.3.1 Federal Regulations

#### Federal Emergency Management Agency

FEMA administers the National Flood Insurance Program to provide subsidized flood insurance to communities that comply with FEMA regulations, which limit development in floodplains. FEMA also prepares FIRMs that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection is established by FEMA. FEMA's minimum level of flood protection for new development is the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year.

#### Clean Water Act

The primary goals of the CWA are to restore and maintain the chemical, physical, and biological integrity of the nation's waters and make all surface waters fishable and swimmable. The U.S. Environmental Protection Agency (EPA) is the lead federal agency responsible for water quality management. The CWA (33 United States Code [USC] 1251–1387) is the primary federal law that governs and authorizes water quality control activities by EPA as well as the states. The federal CWA

of 1977 (33 USC 1251 et seq.), which amended the federal Water Pollution Control Act of 1972, established the basic structure for regulating discharges of pollutants into the waters of the United States (not including groundwater). Under the CWA, it is unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a National Pollutant Discharge Elimination System (NPDES) permit is obtained and implemented. In addition, the CWA requires the states to adopt water quality standards for receiving waterbodies and have those standards approved by EPA. Water quality standards consist of designated beneficial uses for a particular receiving waterbody (e.g., wildlife habitat, agricultural supply, fishing), along with the water quality criteria necessary to support those uses.

## Section 303: Impaired Water Bodies (303(d) list) and Total Maximum Daily Loads

Under Section 303(d) of the CWA, the State Water Resources Control Board (SWRCB) is required to develop a list of impaired waterbodies that do not meet water quality standards (promulgated under the National Toxics Rule [NTR] or the California Toxics Rule [CTR]) after the minimum technology-based effluent limitations have been implemented for point sources. Lists are to be priority ranked for development of a TMDL, which is a calculation of the total maximum amount of a pollutant that a waterbody can receive on a daily basis and still safely meet water quality standards. The California RWQCBs and EPA are responsible for establishing TMDL waste-load allocations and incorporating improved load allocations into water quality control plans, NPDES permits, and waste discharge requirements (WDRs). Section 305(b) of the CWA requires states to assess the status of water quality conditions and submit a report every 2 years. Both CWA requirements are addressed through development of a 303(d)/305(b) Integrated Report, which will provide both an update to the 303(d) list and a 305(b) assessment of statewide water quality. The SWRCB developed a statewide 2014 and 2016 California Integrated Report that was based on the Integrated Reports from each of the nine RWQCBs. The 2014 and 2016 California Integrated Report was approved by the SWRCB on October 3, 2017, and EPA issued its final decision and approval of the California 303(d) list on April 6, 2018.

## Section 402: National Pollutant Discharge Elimination System Permits

Section 402(p) of the CWA was amended in 1987 to require EPA to establish regulations for permitting municipal and industrial (including active construction sites) stormwater discharges under the NPDES permit program. EPA published final regulations for industrial and municipal stormwater discharges on November 16, 1990. The NPDES program requires all industrial facilities and municipalities of a certain size that discharge pollutants into waters of the United States to obtain a permit. Stormwater discharges in California are commonly regulated through general and individual NPDES permits, which are adopted by the SWRCB or RWQCBs and administered by the RWQCBs. EPA requires NPDES permits to be revised to incorporate waste-load allocations for TMDLs when the TMDLs are approved (40 Code of Federal Regulations [CFR] 122).

NPDES permits generally identify effluent and receiving water limits for allowable concentrations and/or mass emissions of pollutants contained in a discharge; prohibitions on discharges that were not specifically allowed under the permit; and provisions that describe required actions to be taken by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, or other activities.

### Section 404: Permits for Dredged or Fill Material

Under Section 404, the U.S. Army Corps of Engineers (USACE) and EPA regulate the discharge of dredged and fill materials into the waters of the United States. These waters are defined primarily as navigable waterways or water features (including wetlands) that have a significant nexus to navigable waters. Project sponsors must obtain authorization from USACE for all discharges of dredged or fill materials into waters of the United States before proceeding with a proposed activity. Individual Section 404 permits may be issued only for a least environmentally damaging practicable alternative. Compliance with CWA Section 404 requires compliance with several other environmental laws and regulations. USACE cannot issue an individual permit or verify the use of a general permit until the requirements of the National Environmental Policy Act of 1969, Endangered Species Act, Coastal Zone Management Act, and National Historic Preservation Act have been met. In addition, no permit can be issued or verified until a water quality certification, or waiver of certification, has been issued pursuant to CWA Section 401.

### Section 401: Water Quality Permits

Under Section 401 of the CWA, an applicant for a Section 404 permit to discharge dredged or fill material into waters of the United States must first obtain a certificate from the appropriate state agency, stating that the fill is consistent with the state's water quality standards and criteria. In California, the authority to grant a water quality certification or waive the requirement is delegated by the SWRCB to the nine RWQCBs.

## 4.9.3.2 State Regulations

### Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (embodied in the California Water Code) of 1969 (Porter-Cologne Act) is California's statutory authority for the protection of water quality. Under the Porter-Cologne Act, the state must adopt water quality policies, plans, and objectives that protect its waters for the use and enjoyment of the people. Under the California Water Code, the State of California is divided into nine regions, which are governed by RWQCBs that, under the guidance and review of the SWRCB, implement and enforce provisions of the California Water Code and the CWA. The Proposed Program is in Region 9, the San Diego region, and governed by the San Diego RWQCB.

The Porter-Cologne Act also requires waste dischargers to notify the RWQCBs of their activities through the filing of "Reports of Waste Discharge" and authorizes the SWRCB and RWQCBs to issue and enforce WDRs, NPDES permits, Section 401 water quality certifications, or other approvals.

Section 13050 of the California Water Code defines what is considered pollution, contamination, or nuisance. Briefly defined, pollution means an alteration of water quality such that it unreasonably affects the beneficial uses of water. Contamination means an impairment of water quality to the degree that it creates a hazard to public health. Nuisance is defined as anything that is injurious to health, offensive to the senses, or an obstruction to use of a property, affecting a considerable number of people.

### SWRCB Construction General Permit

Construction activities that disturb 1 acre or more of land must obtain coverage under the SWRCB Construction General Permit (Order 2009-0009-DWQ, as amended by Order 2010-0014-DWQ and

Order 2012-006-DWQ). Under the terms of the permit, applicants must file complete and accurate Notice of Intent and permit registration documents with the SWRCB. Applicants must also demonstrate conformance with applicable construction BMPs and prepare a construction Stormwater Pollution Prevention Plan (SWPPP), containing a site map that shows the construction site perimeter; existing and proposed buildings; lots; roadways; stormwater collection and discharge points; general topography, both before and after construction; and the drainage patterns across a project site.

# 4.9.3.3 Local Regulations

## Water Quality Control Plan (Basin Plan)

The preparation and adoption of water quality control plans (Basin Plans) is required by the California Water Code (Section 13240) as prescribed by the CWA. Section 303 of the CWA requires states to adopt water quality standards that "consist of the designated uses of the navigable waters involved and the water quality criteria for such waters based upon such uses." According to Section 13050 of the California Water Code, Basin Plans consist of a designation or establishment of beneficial uses to be protected, water quality objectives to protect those uses, and a program of implementation needed for achieving the objectives for the waters within a specified area. Because beneficial uses, together with their corresponding water quality objectives, can be defined per federal regulations as water quality standards, the Basin Plans are regulatory references for meeting the state and federal requirements for water quality control.

### Water Quality Objectives

The Basin Plan sets narrative and numerical water quality objectives that must be attained or maintained to protect beneficial uses and conform to the state's degradation policy. The water quality objectives are the levels of water quality constituents that must be met to protect the beneficial uses (San Diego RWQCB 2016). Table 4.9-3 includes a summarized list of these water quality constituents that received narrative or numerical concentration objectives. Surface water and groundwater quality objectives for waters in the Program area are shown in Table 4.9-4. A complete and detailed list of water quality objectives can be found in the Basin Plan. Each water quality constituent may result in varied objectives conditional on the beneficial use of the waters.

**Table 4.9-4. Water Quality Constituents**

| | |
|---|---|
| Bacteria – Total coliform, fecal coliform, E. Coli, and enterococci | pH |
| Biostimulatory Substances | Phenolic Compounds |
| Boron | Radioactivity |
| Chlorides | Secondary Drinking Water Standards[2] |
| Color | Sediment |
| Dissolved Oxygen | Sodium |
| Floating Material | Sulfate |
| Fluoride | Suspended and Settleable Solids |
| Inorganic Chemicals[1] | Tastes and Odors |
| Iron | Temperature |
| Manganese | Total Dissolved Solids |
| Methylene Blue–Activated Substances | Toxicity |
| Nitrate | Toxic Pollutants[3] |
| Oil and Grease | Trihalomethanes |
| Organic Chemicals | Turbidity |
| Pesticides | Un-Ionized ammonia |

Source: San Diego RWQCB 2016.

[1] Waters designated for use as domestic or municipal supply (MUN) cannot contain concentrations of inorganic chemicals in excess of the maximum contaminant levels set forth in California Code of Regulations, Title 22, Table 64431-A of section 64431 (Inorganic Chemicals), which is incorporated by reference into the Basin Plan. Inorganic chemicals include aluminum, antimony, arsenic, asbestos, barium, beryllium, cadmium, chromium, cyanide, fluoride, mercury, nickel, nitrate, nitrate+nitrite, nitrite, selenium, and thallium.

[2] Water designated for use as domestic or MUN cannot contain concentrations of chemical constituents in excess of the maximum contaminant levels specified in Table 64449-A of section 64449 of Title 22 of the California Code of Regulations (Secondary Maximum Contaminant Levels, Consumer Acceptance Limits), which is incorporated by reference into the Basin Plan. Includes aluminum, color, copper, corrosivity, foaming agents, iron, manganese, methyl tert-butyl ether (MTBE), odor threshold, silver, thiobencarb, turbidity and zinc.

[3] EPA promulgated a final rule prescribing water quality criteria for toxic pollutants in inland surface waters, enclosed bays, and estuaries in California on May 18, 2000 (The California Toxics Rule or "CTR" [40 CFR 131.38]). CTR criteria constitute applicable water quality criteria in California. In addition to the CTR, certain criteria for toxic pollutants in the National Toxics Rule (40 CFR 131.36) constitute applicable water quality criteria in California as well. The Shelter Island Yacht Basin portion of San Diego Bay is designated as an impaired waterbody for dissolved copper pursuant to Clean Water Act section 303(d). A Total Maximum Daily Load (TMDL) has been adopted to address this impairment.

## RWQCB Municipal Stormwater Permit

The Municipal Stormwater Permit (Order R9-2013-0001, as amended by Order R9-2015-001 and Order R9-2015-0100) is an NPDES permit that requires the owners and operators of municipal separate storm sewer systems MS4s within the San Diego region to implement management programs that limit discharges of pollutants and non-stormwater discharges to and from their MS4. The Municipal Stormwater Permit requires the District and other "co-permittees" to develop watershed-based Water Quality Improvement Plans (WQIPs). The Municipal Stormwater Permit emphasizes watershed program planning and program outcomes. The intent of the permit is to enable each jurisdiction to focus its resources and efforts to:

- Reduce pollutants in stormwater discharges from its MS4.
- Effectively prohibit non-stormwater discharges to its MS4.
- Achieve the interim and final (WQIP) numeric goals.

The Municipal Stormwater Permit prescribes minimum source control BMP requirements and site design Low Impact Development (LID) requirements for all projects regardless of the size. Additionally, the Permit requires Priority Development Projects (PDPs) to incorporate pollutant control BMPs and hydromodification management BMPs.

The District is not currently designated as a non-traditional permittee of the Phase II MS4 Permit. However, future iterations of the MS4 Permit are anticipated to include the District as a non-traditional permittee (SWRCB 2018). The District currently satisfies its obligation to protect and restore California's water resources through implementation of post-construction BMPs that are similar to those required in the City's MS4 Permit.

## General Waste Discharge Requirements for Groundwater Extractions Discharges

The General Waste Discharge Requirements for Groundwater Extractions Discharges (Order. R9-2015-0013) are intended to cover discharges of wastes from groundwater extraction due to construction and other activities. Dischargers must meet the applicable criteria listed in the permit to be subject to WDRs under this permit. Receiving water limitations are based on water quality objectives contained in the Basin Plan and are required as part of the permit. The discharge of groundwater extraction waste from any site cannot, separately or jointly with any other discharge, cause violations of water quality objectives in receiving waters.

The Proposed Program would be required to comply with Order R9-2015-0013 requirements if dewatering is required during construction.

### District Stormwater Compliance

The District implements what are known as stormwater management BMP at all school sites. Pollutant prevention starts by educating and training district staff to understand and apply methods to help prevent pollution from entering the storm drain system (District 2019a). In addition to BMPs, the District conducts stormwater investigations and stormwater compliance/training.

### City of San Diego Jurisdictional Runoff Management Program

Stormwater from operation of District sites is conveyed to City stormwater drainage infrastructure. As such, the water quality requirements of District stormwater runoff are required to comply with the City of San Diego requirements. Under the Municipal Stormwater Permit, each jurisdiction is to prepare a JRMP, which includes a component that addresses issues related to construction activities and a component that addresses issues related to existing development. Additionally, each copermittee prepares and submits an annual report that describes the implementation of programs and strategies to reduce the discharge of pollutants of concern to the MS4 and receiving waters to the maximum extent practicable.

The JRMP is the City of San Diego's approach to improving water quality in its rivers, bays, lakes, and ocean through reducing discharges of pollutants to the MS4. As the operator of an MS4, the City of San Diego is subject to a NPDES Municipal Permit issued by the San Diego RWQCB. The permit requires the City to reduce pollutants in discharges from its storm drain system to waterbodies. The City's MS4 conveys most runoff from rain, irrigation runoff, natural groundwater seepage, and other sources of water to waterbodies without first being directed to a treatment plant. To reduce pollutants in these storm drain system discharges to waterbodies, the City implements or requires its residents and land owners to implement BMPs for Residential, Industrial, Commercial and

Municipal Sites/Sources. Some examples of BMPs include covering potential pollutant sources to prevent contact with rain, employing erosion reduction techniques at construction sites, adjusting sprinklers to eliminate irrigation runoff, sweeping streets and parking lots, and building green infrastructure techniques like planters that capture and treat runoff along streets.

Every private project is required to fill out the Storm Water Requirements Applicability Checklist (Form DS-560) to determine if the project is a PDP, Standard Development Project (SDP), or Exempt and to determine which requirements apply. If a project is determined to be a PDP, it is required to submit a Storm Water Quality Management Plan (SWQMP) at initial submittal to assure incorporation of structural BMPs at initial design. The SWQMP is a project-specific document that describes how the development will meet all of the structural BMP requirements specified in the *Storm Water Standards Manual*.

## General Waste Discharge Requirements for Discharges of Treated Groundwater from VOC Cleanup Sites to Land in the San Diego Region

General Waste Discharge Requirements for Discharges of Treated Groundwater from VOC Cleanup Sites to Land in the San Diego Region (Order R9-2008-0138) are intended to establish discharge specifications, provisions, and monitoring and reporting requirements related to the reinjection of treated groundwater generated during cleanup of sites contaminated with volatile organic compounds (VOCs). Dischargers must meet the applicable criteria listed in the permit to be subject to WDRs under this permit. Cleanup of VOCs in groundwater involves the extraction of polluted groundwater for aboveground treatment in a system that removes the VOCs. Treated groundwater could be discharged to the subsurface by direct injection through a well, or by rapid percolation or infiltration through the soil. If the treated groundwater is returned to the same aquifer from which it was extracted, there should be no adverse impacts on the receiving water quality or on beneficial uses from the discharge.

The Proposed Program would be required to comply with Order R9-2008-0138 requirements if VOCs are encountered in groundwater during construction.

## General Waste Discharge Requirements for In-Situ Groundwater Remediation Projects

Petroleum hydrocarbon fuel and VOCs have been detected in ground water at various cleanup sites throughout the San Diego region that cause or threaten to cause adverse impacts on beneficial uses of ground water. The General Waste Discharge Requirements for In-Situ Groundwater Remediation Projects (Order R9-2008-0081) is intended to regulate the use and application of in-situ biological, chemical, and physical treatments to clean up waste constituents in ground water. Water Code Section 13263(i) establishes criteria to be used by the RWQCB in developing and adopting general WDRs.

The Proposed Program would be required to comply with Order R9-2008-0081 requirements if VOCs are encountered in groundwater during construction.

## San Diego Unified School District's Standard Construction Specifications

All projects within the District are required to comply with the District's most recent Standard Construction Specifications during construction of a project. Several of the standard specifications require compliance with existing regulations or require contractors to avoid or minimize impacts.

Some of the sections of the specifications related to reducing hydrology and water quality impacts include, but are not limited to the following:

- Section 01 57 23 Temporary Stormwater Pollution Controls, which requires the implementation of best management practices during construction.

# 4.9.4 Impact Analysis

## 4.9.4.1 Methodology

The following analysis considers the existing environmental setting and regulatory environment applicable to the District. Identification of the environmental setting and regulatory environment was based partly on a review of existing water resources information available from the City of San Diego's General Plan, Think Blue storm water pollution prevention campaign and Project Clean Water website; FEMA maps; DWR's groundwater bulletin and the City's Urban Water Management Plan; San Diego RWQCB TMDLs; and the District's stormwater compliance website. Implementation of the Proposed Program could adversely affect the quality of waterbodies during future construction activities or result in a long-term increase in pollutant levels in stormwater originating from the new and upgraded schools. The analysis focuses on issues related to surface water hydrology, groundwater, flood hazards, and water quality. Potential direct and indirect impacts associated with the Proposed Program were evaluated and identified. Mitigation measures are provided, where applicable.

The Proposed Program consists of improvements identified in four project categories that represent typical capital improvement projects that could be implemented at any of the District's school and administrative sites, or future sites. Implementation of these project types could result in impacts related to hydrology and water quality resources.

## 4.9.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and modified to reflect the State Supreme Court's guidance and provide the basis for determining significance of hydrology and water quality impacts resulting from the Proposed Program. The determination of whether a hydrology and water quality impact would be significant is based on the thresholds described below and the professional judgment of the District as Lead Agency and the recommendations of qualified personnel at ICF, all of which is based on evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following.

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
3. 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:

a. Result in substantial erosion or siltation on- or off-site;

b. Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site;

c. 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;

d. Impede or redirect flood flows.

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

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

# 4.9.4.3 Impacts and Mitigation Measures

***Threshold 1: Would the Proposed Program violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

***Construction***

Buildout of the Proposed Program would potentially include new acquisition and the construction of new schools or associated administrative facilities. Construction activities associated with new school or administrative facilities would involve substantial ground disturbance over a period of several years and require the use of heavy equipment.

Construction activities associated with this project category could result in activities such as demolition, grading and excavation, filling and compaction, and construction of aboveground facilities and buildings, which could degrade water quality by increasing polluted stormwater runoff. In case of heavy rain or wind conditions, during excavation or other ground-disturbing activities, erosion and sediment transport from future project sites and on- and offsite staging areas could increase. Stormwater runoff (or wind) could carry the exposed or eroded sediments to the storm drain system or directly into storm drains or receiving waters. Erosion and sedimentation affects water quality through interference with photosynthesis, oxygen exchange, and the respiration, growth, and reproduction of aquatic species. Additionally, other pollutants, such as nutrients, trace metals, and hydrocarbons, can attach to sediment and be transported to storm drains or receiving waters, which could contribute to water quality degradation.

In addition to potential pollutant contributions from disturbed soil areas, the delivery, handling, and storage of construction materials and wastes, as well as the use of construction equipment, could introduce a risk for stormwater contamination that could affect water quality. Spills or leaks from heavy equipment and machinery can result in oil and grease contamination. Some hydrocarbon compound pollution associated with oil and grease can be toxic to aquatic organisms at low

concentrations. On- and offsite staging areas or building sites can also be the source of pollution because of the use of paints, solvents, cleaning agents, and metals during construction. Materials from soil excavation could contain hazardous materials that may be exposed to stormwater. Larger pollutants, such as trash, debris, and organic matter, are also associated with construction activities. Furthermore, concrete used for structures, footings, and other paving materials could be potential sources of water quality pollution if any of these materials were spilled or deposited on unprotected surfaces. Other potential effects include health hazards and aquatic ecosystem damage associated with introduction of bacteria, viruses, and vectors if waste management is not adequately implemented. As such, construction activities associated with new school or administrative facilities could violate water quality standards or WDRs, and impacts would be potentially significant (**Impact-HWQ-1**). Mitigation measure **MM-HWQ-1** is included to identify compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable.

Construction activities associated with new school or administrative facilities that would disturb more than 1 acre of land would be required to comply with the Construction General Permit, which would require development and implementation of a SWPPP by a Qualified SWPPP Developer. The SWPPP would identify which construction BMPs would be implemented in order to protect stormwater runoff and include a monitoring plan for measuring BMP effectiveness. BMPs are required to be inspected regularly by a Qualified SWPPP Practitioner. The Qualified SWPPP Practitioner monitors the construction activities to ensure the BMPs listed in the SWPPP are implemented and performing as anticipated. For projects under 1 acre of land, construction BMPs would also be implemented, such as employing erosion reduction techniques at construction sites, preventing or reducing the discharge of pollutants to stormwater from solid or liquid construction waste, and implementing dust control measures consistent with the City of San Diego's JRMP.

As part of **MM-HWQ-1**, a variety of construction BMPs would be required to be implemented throughout the various construction phases in order to protect water quality. At a minimum, BMPs would include practices to minimize the contact of construction materials, equipment, and maintenance supplies (e.g., fuels, lubricants, paints, solvents, adhesives) with stormwater. When grading is conducted during the rainy season, the primary BMPs selected would focus on erosion control (i.e., keeping sediment in place) and then on sediment control (i.e., keeping sediment on site). Measures would include a range of stormwater control BMPs, such as installing erosion control such as silt fences, staked fiber rolls, and geofabric to prevent silt runoff to storm drains or waterways. Topsoil and backfill would be stockpiled, protected, and replaced at the conclusion of construction activities. Disturbed soil would be revegetated as soon as possible with the appropriate selection and schedule for turf, plants, and other landscaping vegetation. With implementation of these BMPs, pollutant discharges would be limited and would not significantly impair water quality standards and beneficial uses. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-1** would be reduced to less-than-significant levels.

***Operation***

The operation of new school or administrative facilities would result in new school sites compared to existing conditions, which could increase the impervious surfaces in the Proposed Program area. New and expanded school uses could generate pollutants that impair water quality if not treated prior to discharge. The result may impair receiving waters. Typical pollutants associated with school sites include but are not limited to suspended solids, pathogens, nutrients, pesticides, organic compounds, metals, trash/debris, oxygen-demanding substances, and oil and grease. Therefore, this

project category could result in potentially significant impacts related to a violation of water quality standards or WDRs during operation activities (**Impact-HWQ-2**).

The District is not currently subject to the City's MS4 Permit. However, future iterations of the MS4 Permit are anticipated to include the District as a non-traditional permittee (SWRCB 2018). The District currently satisfies its obligation to protect and restore California's water resources through actions that are equivalent to the City's MS4 Permit requirements. As part of the Proposed Program, the District would comply with implementation of post-construction BMPs as detailed in the City's JRMP.

Mitigation measure **MM-HWQ-2** is included to identify compliance with the most current MS4 Permit and JRMP requirements. The City's MS4 Permit and JRMP include specific requirements for all development and redevelopment activities that meet a certain size. As part of local requirements for the City's MS4 Permit, compliance with minimum source control BMP requirements and site design LID requirements is required for all projects, regardless of the size. Additionally, the Permit requires PDPs to incorporate pollutant control BMPs and hydromodification management BMPs. Post-construction BMPs are a subset of BMPs, including structural and nonstructural controls that detain, retain, filter, or educate to prevent the release of pollutants to surface waters during the functional life of developments. The City's MS4 Permit also specifically requires pollutant control BMPs for certain types of development, including those with larger parking lots. Stormwater pollutant control BMPs are engineered facilities that are designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), biofilter, and/or provide flow-through treatment of stormwater runoff generated on a future project site. Minimum BMPs consistent with the City's MS4 Permit require the use of site design BMPs and source control and pollutant control BMPs.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-HWQ-1: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

#### *Operation*

**Impact-HWQ-2: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of New School or Administrative Facilities.** Operation activities associated with new school or administrative facilities could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-1:**

> **MM-HWQ-1**: **Implement Construction Best Management Practices.** Prior to the onset of any construction activities affecting over 1 acre of land, the District shall obtain coverage under the National Pollutant Discharge Elimination System Construction General Permit, as issued by the San Diego Regional Water Quality Control Board. The District shall be responsible for ensuring

that construction activities comply with the conditions in this permit, including development of a Stormwater Pollution Prevention Plan (SWPPP), implementation of Best Management Practices (BMPs) identified in the SWPPP, and monitoring (as required) to ensure that effects on water quality are minimized. As part of this process, the District shall implement multiple erosion and sediment control BMPs in areas with the potential to drain to surface water. Guidelines established in the City of San Diego Jurisdictional Runoff Management Plan or equivalent guidelines shall be followed in selecting, implementing, and monitoring BMPs for construction activities. The District shall verify that a notice of intent has been submitted to the State Water Resources Control Board and a SWPPP has been completed before allowing construction to begin.

Prior to the onset of any construction activities under 1 acre, the District shall prepare a BMP Plan that identifies implementation of best management practices to ensure that effects on water quality are minimized. As part of this process, the District shall implement multiple erosion and sediment control BMPs in areas with the potential to drain to surface water.

For **Impact-HWQ-2**:

**MM-HWQ-2**: **Implement Low Impact Development Features and Post-Construction Best Management Practices.** The District shall complete the City of San Diego's Storm Water Requirements Applicability Checklist (Form DS-560) to determine if the project is a Priority Development Project (PDP), Standard Development Project, or Exempt and to determine which stormwater requirements apply. Per the City of San Diego's National Pollutant Discharge Elimination System Municipal Permit and Jurisdictional Runoff Management Plan, the District shall implement the applicable stormwater Best Management Practices (BMPs) into project building and grading plans. The Jurisdictional Runoff Management Plan (JRMP) dictates installation of which post-construction BMPs to implement to prevent pollutants from entering the storm drainage system. The JRMP requirements may include, but are not limited to, minimum source control BMP requirements and site design Low Impact Development requirements for all projects regardless of the size and for PDPs to incorporate pollutant control BMPs and hydromodification management BMPs.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of new school or administrative facilities. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-1** would be reduced to less-than-significant levels.

#### *Operation*

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of new school or administrative facilities would not violate any water quality standards or WDRs, and **Impact-HWQ-2** would be reduced to less-than-significant levels.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

Whole site modernization projects involve substantial redevelopment of existing school or administrative properties. Construction activities associated with whole site modernization projects would generally involve substantial ground disturbance, occur in phases over a period of several years, and require the use of heavy equipment.

Construction activities associated with this project category could involve demolition, grading and excavation, filling and compaction, and construction of aboveground facilities and buildings, which could degrade water quality by increasing polluted stormwater runoff. In case of heavy rain or wind conditions, during excavation or other ground-disturbing activities, erosion and sediment transport from future project sites and on- and offsite staging areas could increase. Stormwater runoff (or wind) could carry the exposed or eroded sediments to the storm drain system or directly into storm drains or receiving waters. Erosion and sedimentation affects water quality through interference with photosynthesis, oxygen exchange, and the respiration, growth, and reproduction of aquatic species. Additionally, other pollutants, such as nutrients, trace metals, and hydrocarbons, can attach to sediment and be transported to storm drains or receiving waters, which could contribute to water quality degradation.

In addition to potential pollutant contributions from disturbed soil areas, the delivery, handling, and storage of construction materials and wastes, as well as the use of construction equipment, could introduce a risk for stormwater contamination that could affect water quality. Spills or leaks from heavy equipment and machinery can result in oil and grease contamination. Some hydrocarbon compound pollution associated with oil and grease can be toxic to aquatic organisms at low concentrations. On- and offsite staging areas or building sites can also be the source of pollution from paints, solvents, cleaning agents, and metals used during construction. Materials from soil excavation could contain hazardous materials that may be exposed to stormwater. Larger pollutants, such as trash, debris, and organic matter, are also associated with construction activities. Furthermore, concrete used for structures, footings, and other paving materials could be a potential source of water quality pollution if spilled or deposited on unprotected surfaces. Other potential effects include health hazards and aquatic ecosystem damage associated with introduction of bacteria, viruses, and vectors if waste management is not adequately implemented. As such, construction activities associated with whole site modernization projects could violate water quality standards or WDRs, and impacts would be potentially significant (**Impact-HWQ-3**). Mitigation measure **MM-HWQ-1** is included to identify compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable.

Construction activities associated with whole site modernization projects that would disturb more than 1 acre of land would be required to comply with the Construction General Permit, which would require development and implementation of a SWPPP by a Qualified SWPPP Developer. The SWPPP would identify which construction BMPs would be implemented in order to protect stormwater runoff and include a monitoring plan for measuring BMP effectiveness. BMPs are required to be inspected regularly by a Qualified SWPPP Practitioner. The Qualified SWPPP Practitioner monitors the construction activities to ensure the BMPs listed in the SWPPP are implemented and performing as anticipated. For projects under 1 acre of land, construction BMPs would also be implemented, such as employing erosion reduction techniques at construction sites, preventing or reducing the

discharge of pollutants to stormwater from solid or liquid construction waste, and implementing dust control measures consistent with the City of San Diego's JRMP.

As part of **MM-HWQ-1**, a variety of construction BMPs would be required to be implemented throughout the various construction phases in order to protect water quality. At a minimum, BMPs would include practices to minimize the contact of construction materials, equipment, and maintenance supplies (e.g., fuels, lubricants, paints, solvents, adhesives) with stormwater. When grading is conducted during the rainy season, the primary BMPs selected would focus on erosion control (i.e., keeping sediment in place) and then on sediment control (i.e., keeping sediment on site). Measures would include a range of stormwater control BMPs, such as installing erosion control such as silt fences, staked fiber rolls, and geofabric to prevent silt runoff to storm drains or waterways. Topsoil and backfill would be stockpiled, protected, and replaced at the conclusion of construction activities. Disturbed soil would be revegetated as soon as possible with the appropriate selection and schedule for turf, plants, and other landscaping vegetation. With implementation of these BMPs, pollutant discharges would be limited and would not significantly impair water quality standards and beneficial uses. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-3** would be reduced to less-than-significant levels.

***Operation***

The operation of expanded school sites under this project category could increase the impervious surfaces in the Proposed Program area compared to existing conditions. New and expanded school uses could generate pollutants that impair water quality if not treated prior to discharge. The result may impair receiving waters. Typical pollutants associated with school sites include, but are not limited to, suspended solids, pathogens, nutrients, pesticides, organic compounds, metals, trash/debris, oxygen-demanding substances, and oil and grease. Therefore, whole site modernization projects could result in potentially significant impacts related to a violation of water quality standards or WDRs during operation activities (**Impact-HWQ-4**).

The District is not currently subject to the City's MS4 Permit. However, future iterations of the MS4 Permit are anticipated to include the District as a non-traditional permittee (SWRCB 2018). The District currently satisfies its obligation to protect and restore California's water resources through actions that are equivalent to the City's MS4 Permit requirements. As part of the Proposed Program, the District would comply with implementation of post-construction BMPs as detailed in the City's JRMP.

Mitigation measure **MM-HWQ-2** is included to identify compliance with the most current MS4 Permit and JRMP requirements. The City's MS4 Permit and JRMP include specific requirements for all development and redevelopment activities that meet a certain size. As part of local requirements for the City's MS4 Permit, compliance with minimum source control BMP requirements and site design LID requirements is required for all projects, regardless of the size. Additionally, the Permit requires PDPs to incorporate pollutant control BMPs and hydromodification management BMPs. Post-construction BMPs are a subset of BMPs, including structural and nonstructural controls that detain, retain, filter, or educate to prevent the release of pollutants to surface waters during the functional life of developments. The City's MS4 Permit also specifically requires pollutant control BMPs for certain types of development, including those with larger parking lots. Stormwater pollutant control BMPs are engineered facilities that are designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), biofilter, and/or provide flow-through treatment of

stormwater runoff generated on a future project site. Minimum BMPs consistent with the City's MS4 Permit require the use of site design BMPs and source control and pollutant control BMPs.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-HWQ-3: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

#### *Operation*

**Impact-HWQ-4: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of Whole Site Modernization Projects.** Operation activities associated with whole site modernization projects could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-3:**

Implement **MM-HWQ-1,** as described above.

For **Impact-HWQ-4**:

Implement **MM-HWQ-2,** as described above.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of whole site modernization projects. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-3** would be reduced to less-than-significant levels.

#### *Operation*

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of whole site modernization projects would not violate any water quality standards or WDRs, and **Impact-HWQ-4** would be reduced to less-than-significant levels.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would generally result in minimal or no ground disturbing activities and would not require the use of heavy equipment. The construction period would typically last less than a year. Given that upgrades would generally involve minimal exterior improvements and primarily interior modernization, this project category would not likely be subject to the Construction General Permit or City of San Diego's JRPM. As identified above, as necessary for exterior improvements such as painting and paving, construction BMPs identified in Section 01 57 23, Temporary Stormwater Pollution Controls, of the District's Standard Construction Specifications (see Section 4.9.3.3, above) that minimize the contact of construction materials, equipment, and maintenance supplies with stormwater would be written into contract documents and would be implemented by the contractors to reduce the overall impact on water quality. With implementation of construction BMPs and the District's Standard Construction Specifications, as needed, upgrades of existing school and administrative sites would not result in a violation of a water quality standard or WDR during construction activities.

Similarly, upgrades of existing school and administrative sites would not be subject to the City's MS4 Permit and would not be required to implement post-construction BMPs. This project category would not be expected to result in additional discharge of pollutants and would not result in a violation of a water quality standard or WDR during construction activities.

#### *Operation*

Operational activities associated with upgrades of existing school and administrative sites would involve occupation and use of the facilities by students, District employees, and the community, which would not violate any water quality standards or WDRs, or otherwise substantially degrade surface or groundwater quality. Impacts related to operations would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would not result in a violation of a water quality standard or WDR with implementation of construction BMPs as needed. Impacts would be less than significant.

#### *Operation*

Operational activities associated with upgrades of existing school and administrative sites would not result in a violation of a water quality standard or WDR with implementation of operational BMPs as needed. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative facilities would not violate any water quality standards or WDRs, or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant. No mitigation is required.

#### *Operation*

Operations following upgrades of existing school and administrative facilities would not violate any water quality standards or WDRs, or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant. No mitigation is required.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

Construction activities associated with joint-use facilities would include installation of fields, walking tracks, parking, or other recreational facilities that would generally involve minimal ground disturbance and light equipment. However, construction of pools would require deep excavation and other ground disturbance for associated facilities using heavy equipment. The construction period would typically last less than a year, and water quality impacts would be similar to those described for new school or administrative facilities construction but on a smaller scale (**Impact-HWQ-5**). Depending on the size of the disturbance, compliance with the Construction General Permit may be required. For projects under 1 acre of land, construction BMPs would also be implemented, consistent with the City of San Diego's JRMP.

#### *Operation*

Operation activities associated with joint-use facilities would include the use of new fields and turf, replacement fencing, and stabilized walking tracks, which would not be subject to the City's MS4 Permit and would not be expected to result in additional discharge of pollutants. However, new or expanded parking could result in an increase in discharge of pollutants associated with parked cars depending on the size of the increased parking, which could impair water quality and violate water quality standards or WDRs (**Impact-HWQ-6**). Depending on the size of the parking increase, post-construction BMPs could be required to prevent the release of pollutants to surface waters during the functional life of the parking.

Mitigation measure **MM-HWQ-2** is included to identify compliance with the most current MS4 Permit and JRMP requirements. The City's MS4 Permit and JRMP include specific requirements for all development and redevelopment activities that meet a certain size. As part of local requirements for the City's MS4 Permit, compliance with minimum source control BMP requirements and site design LID requirements is required for all projects, regardless of the size. Additionally, the Permit requires PDPs to incorporate pollutant control BMPs and hydromodification management BMPs. Post-construction BMPs are a subset of BMPs including structural and nonstructural controls that detain, retain, filter, or educate to prevent the release of pollutants to surface waters during the functional life of developments. The City's MS4 Permit also specifically requires pollutant control BMPs for certain types of development, including those with larger parking lots. Stormwater

pollutant control BMPs are engineered facilities that are designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), biofilter, and/or provide flow-through treatment of stormwater runoff generated on a future project site. Minimum BMPs consistent with the City's MS4 Permit require the use of site design BMPs and source control and pollutant control BMPs.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-HWQ-5: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of Joint-Use Facilities.** Construction activities associated with joint-use facilities could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

#### *Operation*

**Impact-HWQ-6: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of Joint-Use Facilities.** Operation activities associated with joint-use facilities could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-5**:

Implement **MM-HWQ-1,** as described above.

For **Impact-HWQ-6**:

Implement **MM-HWQ-2,** as described above.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of joint-use facilities. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-5** would be reduced to less-than-significant levels.

#### *Operation*

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of joint-use facilities would not violate any water quality standards or WDRs, and **Impact-HWQ-6** would be reduced to less-than-significant levels.

# Site-Specific Analysis

## Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.9-5. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the whole site modernization project category.

**Table 4.9-5. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019b.

### Construction

Construction associated with near-term, site-specific whole site modernization projects could result in activities such as demolition, grading and excavation, and construction of buildings, which could degrade water quality by increasing polluted stormwater runoff. During excavation or other ground-disturbing activities, erosion and sediment transport could increase. Stormwater runoff (or wind) could carry the exposed or eroded sediments to the storm drain system or directly into storm drains or receiving waters. Additionally, other pollutants can attach to sediment and be transported to storm drains or receiving waters, which could contribute to water quality degradation.

In addition, the delivery, handling, and storage of construction materials and wastes, as well as the use of construction equipment, could introduce a risk for stormwater contamination that could affect water quality. On- and offsite staging areas or building sites can also be the source of pollution due to the use of paints, solvents, cleaning agents, and metals during construction. Soil excavation could contain hazardous materials that may be exposed to stormwater, and larger pollutants are also associated with construction activities. Furthermore, any concrete used could be potential sources of water quality pollution if materials were spilled or deposited on unprotected surfaces. Other potential effects include health hazards and aquatic ecosystem damage associated with introduction of bacteria, viruses, and vectors if waste management is not adequately implemented. As such, similar to the issues identified in the program-level Whole Site Modernization analysis, construction activities associated with near-term, site-specific whole site modernization projects could violate water quality standards or WDRs, and impacts would be potentially significant (**Impact-HWQ-3**).

Construction activities associated with near-term, site-specific whole site modernization projects would also be required to comply with the Construction General Permit. A SWPPP would be required that would identify which construction BMPs would be implemented in order to protect stormwater runoff and would include a monitoring plan for measuring BMP effectiveness. BMPs are required to be inspected regularly by a Qualified SWPPP Practitioner. The Qualified SWPPP Practitioner monitors the construction activities to ensure the BMPs listed in the SWPPP are implemented and performing as anticipated.

Although unlikely, construction of near-term, site-specific whole site modernization projects could result in excavation of soils to depths that result in groundwater dewatering activities. Should these occur in areas of groundwater contamination, the dewatering activities could result in water quality degradation if discharged to surface water. However, pumped groundwater must be tested to determine if contaminated, and the water must be collected and disposed of in accordance with the San Diego RWQCB's General Waste Discharge Requirements for Groundwater Extraction Discharges to Surface Waters Permit (Order R9-2015-0013). If VOCs are encountered during construction activities, compliance with the RWQCB's General Waste Discharge Requirements for Discharges of Treated Groundwater from VOC Cleanup Sites to Land in the San Diego Region (Order R9-2008-0138) and General Waste Discharge Requirements for In-Situ Groundwater Remediation Projects (Order R9-2008-0081) would be required. Near-term, site-specific whole site modernization projects that have database listings of potential environmental concern, which could impact water quality if disturbed during construction activities, are identified in Table 4.9-6. Specific environmental concerns are identified in Table 4.8-1 in Section 4.8, *Hazards and Hazardous Materials*. However, compliance with the RWQCB's General Waste Discharge Requirements for Discharges of Treated Groundwater from VOC Cleanup Sites to Land in the San Diego Region (Order R9-2008-0138) and General Waste Discharge Requirements for In-Situ Groundwater Remediation Projects (Order R9-2008-0081) would ensure that the implementation of near-term, site-specific whole site modernization projects would not result in a violation of a water quality standard or WDR during construction activities.

**Table 4.9-6. Near-Term, Site-Specific Whole Site Modernization Projects with Potential Environmental Concerns**

| School | Database Listings of Potential Concern |
|---|---|
| Clairemont High School, 4150 Ute Drive | • 6,000-gallon diesel underground storage tank (UST), removed 1988.<br>• Concrete waste oil sump installed in 1958.<br>• California Department of Resources Recycling and Recovery (CalRecycle) solid waste disposal site, Facility ID No. 37-CR-0015, based on the presence of buried burned waste.<br>• Department of Toxic Substances Control (DTSC) school cleanup site, Site Code 404864, associated with the presence of burned waste. |
| Lewis Middle School, 5170 Greenbrier Avenue | • Unauthorized release (H17104-001) associated with a failed tank-integrity test; case closed in 1987.<br>• 6,000-gallon diesel UST removed in 1988. |
| Kearny High School, 7651 Wellington Way | • 550-gallon waste oil and 4,000-gallon gasoline USTs removed in 1988.<br>• 89-gallon waste oil concrete sump. |
| Madison High School, 4833 Doliva Drive | • Located within a Formerly Used Defense Site (FUDS) boundary, Rosedale Field and Bombing Target, associated with possible unexploded ordinance (UXO), munitions debris (MD), and/or munitions and explosives of concern (MEC). |
| Correia Middle School, 4302 Valeta Street | • Unauthorized release (H00132-001) of boiler fuel from a 4,000-gallon UST removed in 1988 that resulted in impacts on soil; case closed in 1989.<br>• Listed as a CalRecycle land-disposal site, Famosa Blvd. Secondary Deposit Site (37-CR-0014), associated with burned waste mixed with fill soil at the site.<br>• Listed as a DTSC school cleanup site, Site Code 404627, associated with the presence of the burned waste on the site. An Operations and Management (O&M) Agreement is in place with DTSC, and a land use covenant (LUC)/deed-restriction has been recorded with the County of San Diego. |

Source: Environmental Hazards Report, Ninyo and Moore (Appendix H).

### Operation

The near-term, site-specific whole site modernization projects could result in expanded school uses compared to existing conditions, which could increase the impervious surfaces in the Program area. However, the majority of the school sites are currently impervious surfaces, and any increase of impervious surfaces during implementation of these projects would be minimal. However, any expanded school uses could generate pollutants that impair water quality if not treated prior to discharge. The result may impair receiving waters. As described above, typical pollutants associated

with school sites include, but are not limited to, suspended solids, pathogens, nutrients, pesticides, organic compounds, metals, trash/debris, oxygen-demanding substances, and oil and grease. Therefore, near-term, site-specific whole site modernization projects could result in potentially significant impacts related to a violation of water quality standards or WDRs during operation activities (**Impact-HWQ-4**).

As described under the *Program-Level Analysis* section above, the District is not currently subject to the City's MS4 Permit. However, future iterations of the MS4 Permit are anticipated to include the District as a non-traditional permittee (SWRCB 2018). As part of the Proposed Program, including near-term, site-specific whole site modernization projects, the District would comply with implementation of post-construction BMPs as detailed in the City's JRMP.

## Level of Significance Prior to Mitigation

### Construction

**Impact-HWQ-3: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

### Operation

**Impact-HWQ-4: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of Whole Site Modernization Projects.** Operation activities associated with whole site modernization projects could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

## Mitigation Measures

For **Impact-HWQ-3:**

Implement **MM-HWQ-1,** as described above.

For **Impact-HWQ-2**:

Implement **MM-HWQ-4,** as described above.

## Level of Significance After Mitigation

### Construction

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of near-term, site-specific whole site modernization projects. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-3** would be reduced to less-than-significant levels.

#### Operation

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of near-term, site-specific whole site modernization projects would not violate any water quality standards or WDRs, and **Impact-HWQ-4** would be reduced to less-than-significant levels.

***Threshold 2: Would the Proposed Program substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

## Program-Level Analysis

### All Project Categories

#### Impact Discussion

##### *Construction*

Groundwater is present throughout the Proposed Program area ranging from approximately 10 to 50 feet below the ground surface. Construction activities associated with all project categories are unlikely to result in deep excavations that could require dewatering. However, it is possible that some construction activities may result in short-term dewatering during construction of the foundations. Discharge of groundwater into storm drains and receiving waters has the potential to significantly affect water quality. Projects under the Proposed Program that impact groundwater would be required to comply with dewatering requirements imposed by the San Diego RWQCB general WDRs for discharges from temporary groundwater extraction and similar waste discharges to San Diego Bay (Order R9-2015-0013).

To obtain coverage under this order, a discharger must submit a complete Notice of Intent application package to the San Diego RWQCB office at least 60 days before proposed commencement of the discharge. The discharger would be required to maintain compliance with the effluent limitations applicable to the receiving water, as specified in Order R9-2015-0013 (refer to Table 8 of the order). For example, the permit has effluent limitations for settable solids, total suspended solids, turbidity, chronic toxicity, pH, and a number of additional parameters. In addition, Order R9-2015-0013 identifies the monitoring and reporting program requirements. The purpose of the monitoring and reporting program is to determine and ensure compliance with effluent limitations and other requirements established in the order, assess treatment efficiency, characterize effluents, and characterize the receiving water and the effects of the discharge on the receiving water. The San Diego RWQCB may specify increased monitoring requirements as necessary to ensure that applicable water quality objectives are maintained in the receiving water. Any dewatering or construction-related non-stormwater discharges would be controlled in compliance with the San Diego RWQCB permit for dewatering. The permit requires permittees to conduct monitoring of dewatering discharges and adhere to effluent and receiving water limitations contained within the permit so that water quality of surface waters is protected. Compliance with the applicable dewatering permit would further ensure that the impacts of these discharges would be less than significant. No other construction impacts on groundwater are anticipated.

Given that upgrades of existing school and administrative sites would generally involve minimal exterior improvements and primarily interior modernization, this project category would not result in deep excavations that could require dewatering. However, construction activities may result in runoff into storm drains and receiving waters, which has the potential to significantly affect groundwater quality. As described above, any dewatering or construction-related non-stormwater discharges would be controlled in compliance with the San Diego RWQCB permit for dewatering. Therefore, impacts would be less than significant.

Construction activities associated with installation of fields, walking tracks, parking, or other recreational facilities would generally involve minimal ground disturbance and light equipment. However, construction of pools would require deep excavation and other ground disturbance for associated facilities using heavy equipment. Nevertheless, impacts are not anticipated related to construction dewatering as pools are not typically installed in areas with a high-water table. If dewatering for a pool is required, the District would comply with the San Diego RWQCB permit for dewatering. As such, construction impacts on groundwater supplies or groundwater recharge would be less than significant.

#### *Operation*

The operation of school or administrative facilities developed and redeveloped under the Proposed Program could replace a portion of existing pervious surfaces that contributes to some groundwater recharge; however, it would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level because groundwater is not a significant source of water used for municipal purposes. In addition, the school or administrative sites are anticipated to have some associated pervious areas from implementation of post-construction BMPs and pervious area fields. As such, groundwater recharge would not be significantly reduced by the Proposed Program. Similarly, because groundwater underlying the future sites would not be used for municipal purposes, groundwater would not be extracted or decreased for municipal purposes. Given that upgrades of existing school and administrative sites would generally involve minimal exterior improvements and primarily interior modernization, this project category would not impact groundwater during operation activities.

Operation of new fields and turf, replacement fencing, and stabilized walking tracks would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table. No groundwater underlying the future sites would be used for municipal purposes, and groundwater would not be extracted or decreased for municipal purposes. Impacts are not anticipated related to groundwater use as pools would be filled with municipal water sources. No operation impacts on groundwater are anticipated.

As such, the Proposed Program would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Given the Proposed Program would not result in impacts on groundwater, the Proposed Program is not anticipated to conflict with the sustainable management of the groundwater basin.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with all project categories would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project

may impede sustainable groundwater management of the basin. Impacts would be less than significant.

#### *Operation*

Operational activities associated with all project categories would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with the Proposed Program would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that a project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

#### *Operation*

Operational activities associated with the Proposed Program would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that a project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

## Site-Specific Analysis

### Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.9-5 above.

### Construction

As described above, groundwater is present throughout the Program area, ranging from approximately 10 to 50 feet below the ground surface. Construction activities associated with the near-term, site-specific whole site modernization projects are unlikely to result in deep excavations that could require dewatering. However, it is possible that some construction activities may result in short-term dewatering during construction of the foundations. Discharge of groundwater into storm drains and receiving waters has the potential to significantly affect water quality. Near-term, site-specific whole site modernization projects that impact groundwater would be required to comply with dewatering requirements imposed by the San Diego RWQCB general WDRs for discharges from temporary groundwater extraction and similar waste discharges to San Diego Bay (Order R9-2015-0013). Permit requirements under this order are described in detail above under the *Program-Level Analysis* for this threshold. Compliance with the applicable dewatering permit would further ensure that the impacts of these discharges would be less than significant. No other construction impacts on groundwater are anticipated.

#### Operation

Near-term, site-specific whole site modernization projects could replace a portion of existing pervious surfaces that contributes to some groundwater recharge; however, the projects would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level because groundwater is not a significant source of water used for municipal purposes. In addition, near-term, site-specific whole site modernization projects are anticipated to have some associated pervious areas from implementation of post-construction BMPs and pervious area fields. Therefore, groundwater recharge would not be significantly reduced by these projects. As such, near-term, site-specific whole site modernization projects would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Given the Proposed Program would not result in impacts on groundwater, near-term, site-specific whole site modernization projects are not anticipated to conflict with the sustainable management of the groundwater basin.

### Level of Significance Prior to Mitigation

#### Construction and Operation

Construction and operation of near-term, site-specific whole site modernization projects would result in less-than-significant impacts prior to mitigation.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### Construction and Operation

Construction and operation activities associated with near-term, site-specific whole site modernization projects would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

***Threshold 3a: Would the Proposed Program substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on or off site?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

### Impact Discussion

#### *Construction*

Erosion is a group of natural processes, including weathering, dissolution, abrasion, corrosion, and transportation, by which material is worn away from the Earth's surface. Siltation is sediment

suspended in stagnant water or carried by moving water, which often accumulates on the bottom of rivers, bays, etc. Ground-disturbing activities associated with construction of new school or administrative facilities could expose soils to the erosional forces of wind and water during storm events, potentially resulting in erosion and sedimentation on and off the school or administrative sites, and result in the discharge of siltation into storm drains and receiving waters, which would be potentially significant (**Impact-HWQ-7**).

Mitigation measure **MM-HWQ-1** is included to identify compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable. Projects that disturb over an acre of land and soil would prepare and implement a SWPPP in accordance with the Construction General Permit. The SWPPP would identify general and project-specific construction BMPs that would minimize wind or water erosion of soils during the construction stage. For projects under 1 acre of land, construction activities associated with this project category would also implement construction BMPs, consistent with the City's JRMP, to minimize erosion and siltation on or off site. Therefore, impacts from erosion and sedimentation would be less than significant with mitigation incorporated.

***Operation***

During operations of new school or administrative facilities, the impervious surface area could be changed compared to the existing condition and could result in an increase of impervious surface area. Consequently, the amount of stormwater runoff would also increase, which could increase the amount of runoff from the school or administrative facility sites and result in increased erosion or siltation. Therefore, the Proposed Program could result in potentially significant impacts related to substantial erosion or siltation on or off site (**Impact-HWQ-8**). As discussed under Threshold 1, the District would comply with implementation of post-construction BMPs as detailed in the City's JRMP.

Mitigation measure **MM-HWQ-2** is included to identify compliance with the most current MS4 Permit and JRMP requirements. As part of these requirements, the Proposed Program would implement post-construction BMPs including minimum source control BMP and site design LID for all projects regardless of the size. Additionally, the Permit requires PDPs to incorporate hydromodification management BMPs. These post-construction BMPs would stabilize the disturbed soil areas to limit erosion following construction activities. In addition, the post-construction BMPs would be designed to retain runoff (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), to reduce the discharge, which further limits the potential for erosion following construction activities. Therefore, with implementation of **MM-HWQ-2**, the Proposed Program impacts related to erosion and siltation during operation would be less than significant.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-HWQ-7: Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of New Acquisition and New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact.

***Operation***

**Impact-HWQ-8: Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of New Acquisition and New School or Administrative Facilities.** Operational activities associated with new school or administrative facilities could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-7:**

Implement **MM-HWQ-1,** as described above**.**

For **Impact-HWQ-8**:

Implement **MM-HWQ-2,** as described above.

### Level of Significance After Mitigation

***Construction***

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of new school or administrative facilities. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-7** would be reduced to less-than-significant levels.

***Operation***

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of new school or administrative facilities would not violate any water quality standards or WDRs, and **Impact-HWQ-8** would be reduced to less-than-significant levels.

## Whole Site Modernization

### Impact Discussion

***Construction***

Erosion is a group of natural processes, including weathering, dissolution, abrasion, corrosion, and transportation, by which material is worn away from the Earth's surface. Siltation is sediment suspended in stagnant water or carried by moving water, which often accumulates on the bottom of rivers, bays, etc. Ground-disturbing activities associated with whole site modernization projects construction activities could expose soils to the erosional forces of wind and water during storm events, potentially resulting in erosion and sedimentation on and off the school or administrative sites, and result in the discharge of siltation into storm drains and receiving waters, which would be potentially significant (**Impact-HWQ-9**).

Mitigation measure **MM-HWQ-1** is included to identify compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable. Projects that disturb over an acre of land and soil would prepare and implement a SWPPP in accordance with the Construction General Permit. The SWPPP would identify general and project-specific construction BMPs that would minimize wind or water erosion of soils during the construction stage. For projects under 1 acre of land, construction BMPs would also be implemented, consistent with the City's JRMP, to minimize erosion and siltation on or off site. Therefore, impacts from erosion and sedimentation would be less than significant with mitigation incorporated.

***Operation***

During operation, the impervious surface area could be changed compared to the existing condition and could result in an increase of impervious surface area. Consequently, the amount of stormwater runoff would also increase, which could increase the amount of runoff from the school sites and result in increased erosion or siltation. Therefore, whole site modernization projects could result in potentially significant impacts related to substantial erosion or siltation on or off site during operations (**Impact-HWQ-10**). As discussed under Threshold 1, the District would comply with implementation of post-construction BMPs as detailed in the City's JRMP.

Mitigation measure **MM-HWQ-2** is included to identify compliance with the most current MS4 Permit and JRMP requirements. As part of these requirements, whole site modernization projects would implement post-construction BMPs including minimum source control BMP and site design LID for all projects regardless of the size. Additionally, the Permit requires PDPs to incorporate hydromodification management BMPs. These post-construction BMPs would stabilize the disturbed soil areas to limit erosion following construction activities. In addition, the post-construction BMPs would be designed to retain runoff (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), to reduce the discharge, which further limits the potential for erosion following construction activities. Therefore, with implementation of **MM-HWQ-2**, whole site modernization projects impacts related to erosion and siltation during operation would be less than significant.

**Level of Significance Prior to Mitigation**

***Construction***

**Impact-HWQ-9: Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact.

***Operation***

**Impact-HWQ-10: Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of Whole Site Modernization Projects.** Operation activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact.

**Mitigation Measures**

For **Impact-HWQ-9:**

Implement **MM-HWQ-1,** as described above**.**

For **Impact-HWQ-10**:

Implement **MM-HWQ-2,** as described above.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of whole site modernization projects. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-9** would be reduced to less-than-significant levels.

#### *Operation*

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of whole site modernization projects would not violate any water quality standards or WDRs, and **Impact-HWQ-10** would be reduced to less-than-significant levels.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would generally result in minimal or no ground disturbing activities and would not require the use of heavy equipment. The construction period would typically last less than a year. Given the upgrades would generally involve minimal exterior improvements and primarily interior modernization, this project category would not result in substantial erosion or siltation on or off site.

#### *Operation*

Given the upgrades of existing school and administrative sites would generally involve minimal exterior improvements and primarily interior modernization, this project category would not result in a change to impervious surfaces and would not alter runoff at a future project site. Therefore, upgrades of existing school and administrative sites would not result in erosion and siltation during operation, and impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on or off site. Impacts would be less than significant.

Impacts would be less than significant.

***Operation***

Operation of upgrades of existing school and administrative sites would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on or off site. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

***Construction***

Construction activities associated with upgrades of existing school and administrative sites would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on or off site. Impacts would be less than significant.

***Operation***

Operation of upgrades of existing school and administrative sites would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on or off site. Impacts would be less than significant.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

***Construction***

Construction activities associated with joint-use facilities development, which include the installation of fields, walking tracks, parking, or other recreational facilities, would generally involve minimal ground disturbance and light equipment. Construction of pools would require deep excavation and other ground disturbance for associated facilities using heavy equipment. There is a potential for erosion associated with the ground disturbance, which would be potentially significant (**Impact-HWQ-11**). Depending on the size of the disturbance, compliance with the Construction General Permit may be required. For projects under 1 acre of land, construction BMPs would also be implemented, consistent with the City's JRMP, to minimize erosion and siltation on or off site.

Mitigation measure **MM-HWQ-1** is included to identify compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable. With implementation of erosion and sediment control BMPs required as part of **MM-HWQ-1**, joint-use facilities projects would not result in substantial erosion or siltation on or off site. Impacts would be less than significant with mitigation.

***Operation***

Operation of new fields and turf, replacement fencing, and stabilized walking tracks would not be expected to increase impervious surfaces and result in changes to runoff at a future project site. However, implementation of new or expanded parking could result in an increase in stormwater discharge associated with an increased impervious surface, which could result in substantial erosion or siltation on or off site (**Impact-HWQ-12**). Depending on the size of the parking increase, post-construction BMPs could be required. Small increases in parking are not likely to substantially alter runoff at a future project site. However, for larger parking lots, post-construction BMPs would be designed to retain runoff (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), to reduce the discharge, which further limits the potential for erosion.

With implementation of post-construction BMPs, as determined through implementation of **MM-HWQ-2**, **Impact-HWQ-12** would be less than significant.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-HWQ-11: Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of Joint-Use Facilities.** Construction activities associated with joint-use facilities could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact.

***Operation***

**Impact-HWQ-12: Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of Joint-Use Facilities.** Operation activities associated with joint-use facilities could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-11:**

Implement **MM-HWQ-1,** as described above**.**

For **Impact-HWQ-12**:

Implement **MM-HWQ-2,** as described above.

### Level of Significance After Mitigation

### Construction

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of joint-use facilities. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-11** would be reduced to less-than-significant levels.

***Operation***

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of joint-use facilities would not violate any water quality standards or WDRs, and **Impact-HWQ-12** would be reduced to less-than-significant levels.

## Site-Specific Analysis

### Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.9-5 above.

#### Construction

Similar to the Proposed Program, ground-disturbing activities associated with near-term, site-specific whole site modernization project construction activities could alter the existing drainage pattern of the site, expose soils to the erosional forces of wind and water during storm events, and potentially result in erosion and sedimentation on and off the school or administrative sites, and result in the discharge of siltation into storm drains and receiving waters, which would be potentially significant (**Impact-HWQ-9**), as identified under the *Program-Level Analysis* for this threshold.

#### Operation

During operation, the impervious surface area could be changed compared to the existing condition and could result in an increase of impervious surface area or alter the existing drainage pattern of the site. Consequently, the amount of stormwater runoff would also increase, which could increase the amount of runoff from the school sites and result in increased erosion or siltation. Therefore, near-term, site-specific whole site modernization projects could result in potentially significant impacts related to substantial erosion or siltation on or off site (**Impact-HWQ-10**), as identified under the *Program-Level Analysis* for this threshold. As discussed under Threshold 1, the District would comply with implementation of post-construction BMPs as detailed in the City's JRMP.

### Level of Significance Prior to Mitigation

#### Construction

**Impact-HWQ-9: Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact.

#### Operation

**Impact-HWQ-10: Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of Whole Site Modernization Projects.** Operation activities associated with whole site

modernization projects could alter the existing drainage pattern of the site or area, and could result in substantial erosion or siltation on or off site. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-9:**

Implement **MM-HWQ-1,** as described above**.**

For **Impact-HWQ-10**:

Implement **MM-HWQ-2,** as described above.

### Level of Significance After Mitigation

#### Construction

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of near-term, site-specific whole site modernization projects. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-9** would be reduced to less-than-significant levels.

#### Operation

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of near-term, site-specific whole site modernization projects would not violate any water quality standards or WDRs, and **Impact-HWQ-10** would be reduced to less-than-significant levels.

***Thresholds 3b and 3d: Would the Proposed Program substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site or impede or redirect flood flows?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

The majority of surface runoff in the region is handled in the storm drain systems as there are no large river or stream flows that create flood conditions. However, new school or administrative

facilities would potentially be located adjacent to a flood zone that could experience flood conditions during large storm events. During construction activities associated with new school or administrative facilities, drainage systems would be temporarily modified, which could result in localized flooding, which would be a potentially significant impact **(Impact-HWQ-13)**. Water use during construction activities does not generally generate enough volume to create flooding conditions, and construction activities associated with this project category that would disturb more than 1 acre of land would be required to comply with the Construction General Permit, which would require development and implementation of a SWPPP. For projects under 1 acre of land, Proposed Program construction activities would implement construction BMPs, consistent with the City of San Diego's JRMP.

Mitigation measure **MM-HWQ-1** is included to identify compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable. Implementation of construction BMPs would control site run on and runoff to limit the potential for offsite flooding. BMPs would ensure the drainage system stays operational and is not altered significantly from the existing condition, which would ensure water volumes and velocities would be accommodated from construction-related water use and during a storm event. In addition, the flood zones would be kept free of construction equipment during storm events to ensure a new school or administrative facility would not impede or redirect flood flows. Therefore, impacts related to flooding on or off site as a result of an increase of impervious surfaces and impeding or redirecting flood flows would be less than significant with mitigation.

***Operation***

During operation of new school or administrative facilities, the impervious surface area could be changed compared to the existing condition and could result in an increase of impervious surface area. Consequently, the amount of stormwater runoff would also increase, which could increase the amount of runoff from the school sites. This increase could result in substantial flooding on or off site, which would be a potentially significant impact **(Impact-HWQ-14)**. As discussed under Threshold 1, the District would comply with implementation of post-construction BMPs as detailed in the City's JRMP.

There is the potential for some of the new school or administrative facilities to be located within a flood zone. Development in the floodway is generally discouraged and must preclude a rise in the 100-year water surface elevation. Development in the flood fringe (area within the floodplain, but outside the floodway) is allowed subject to San Diego Municipal Code Section 143.0145(f). Development associated with new school or administrative facilities projects within the flood zone would need to be elevated above flood levels and comply with the City of San Diego's Municipal Code. Compliance with the Municipal Code would ensure that development would not result in substantial flooding on or off site, and would not impede or redirect flood flows.

Mitigation measure **MM-HWQ-2** is included to identify compliance with the most current MS4 Permit and JRMP requirements. The District would implement post-construction BMPs designed to retain runoff (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), to reduce the discharge, which further limits the potential for substantial flooding on or off site following construction activities. Therefore, with implementation of **MM-HWQ-2** and compliance with San Diego Municipal Code Section 143.0145(f), a new school or administrative facility would not result in impacts related to substantial flooding on or off site, and would not impede or redirect flood flows during operation. Impacts would be less than significant with mitigation.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-HWQ-13: Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Construction of New School or Administrative Facilities.** Construction activities associated with new school or administrative facilities could alter the existing drainage pattern of the site or area, and could result in substantial flooding on or off site or impede or redirect flood flows. This is a potentially significant impact.

#### *Operation*

**Impact-HWQ-14: Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of New School or Administrative Facilities.** Operation activities associated with new school or administrative facilities could alter the existing drainage pattern of the site or area, and could result in substantial flooding on or off site or impede or redirect flood flows. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-13:**

Implement **MM-HWQ-1,** as described above**.**

For **Impact-HWQ-14**:

Implement **MM-HWQ-2,** as described above**.**

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of new school or administrative facilities. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-13** would be reduced to less-than-significant levels.

#### *Operation*

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of new school or administrative facilities would not violate any water quality standards or WDRs, and **Impact-HWQ-14** would be reduced to less-than-significant levels.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

The majority of surface runoff in the region is handled in the storm drain systems as there are no large river or stream flows that create flood conditions. However, whole site modernization projects would potentially be located adjacent to a flood zone that could experience flood conditions during large storm events. During construction activities associated with whole site modernization projects, drainage systems would be temporarily modified, which could result in localized flooding, which would be a potentially significant impact **(Impact-HWQ-15)**. Water use during construction activities does not generally generate enough volume to create flooding conditions, and construction activities associated with this project category that would disturb more than 1 acre of land would be required to comply with the Construction General Permit, which would require development and implementation of a SWPPP. For projects under 1 acre of land, construction activities would implement construction BMPs, consistent with the City of San Diego's JRMP.

Mitigation measure **MM-HWQ-1** is included to identify compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable. Implementation of construction BMPs would control site run on and runoff to limit the potential for offsite flooding. BMPs would ensure the drainage system stays operational and is not altered significantly from the existing condition, which would ensure water volumes and velocities would be accommodated from construction-related water use and during a storm event. In addition, the flood zones would be kept free of construction equipment during storm events to ensure a whole site modernization project would not impede or redirect flood flows. Therefore, impacts related to flooding on or off site as a result of an increase of impervious surfaces and impeding or redirecting flood flows would be less than significant with mitigation.

#### *Operation*

During operation of whole site modernization projects, the impervious surface area could be changed compared to the existing condition and could result in an increase of impervious surface area. Consequently, the amount of stormwater runoff would also increase, which could increase the amount of runoff from the school sites. This increase could result in substantial flooding on or off site, which would be a potentially significant impact **(Impact-HWQ-16)**. As discussed under Threshold 1, the District would comply with implementation of post-construction BMPs as detailed in the City's JRMP.

There is the potential for some of the whole site modernization project sites to be located within a flood zone. Development in the floodway is generally discouraged and must preclude a rise in the 100-year water surface elevation. Development in the flood fringe (area within the floodplain, but outside the floodway) is allowed subject to San Diego Municipal Code Section 143.0145(f). Development associated with whole site modernization projects within the flood zone would need to be elevated above flood levels and comply with the City of San Diego's Municipal Code. Compliance with the Municipal Code would ensure that development would not result in substantial in flooding on or off site, and would not impede or redirect flood flows.

Mitigation measure **MM-HWQ-2** is included to identify compliance with the most current MS4 Permit and JRMP requirements. The District would implement post-construction BMPs designed to

retain runoff (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), to reduce the discharge, which further limits the potential for substantial flooding on or off site following construction activities. Therefore, with implementation of **MM-HWQ-2** and compliance with San Diego Municipal Code Section 143.0145(f), a whole site modernization project would not result in impacts related to substantial flooding on or off site, and would not impede or redirect flood flows during operation. Impacts would be less than significant with mitigation.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-HWQ-15: Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could result in substantial flooding on or off site or impede or redirect flood flows. This is a potentially significant impact.

#### *Operation*

**Impact-HWQ-16: Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of Whole Site Modernization Projects.** Operation activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could result in substantial flooding on or off site or impede or redirect flood flows. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-15:**

Implement **MM-HWQ-1,** as described above**.**

For **Impact-HWQ-16**:

Implement **MM-HWQ-2,** as described above**.**

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of whole site modernization projects. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-15** would be reduced to less-than-significant levels.

#### *Operation*

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of whole site modernization

projects would not violate any water quality standards or WDRs, and **Impact-HWQ-16** would be reduced to less-than-significant levels.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would generally result in minimal or no ground disturbing activities and would not require the use of heavy equipment. The construction period would typically last less than a year. Given the upgrades would generally involve minimal exterior improvements and primarily interior modernization, this project category would not result in substantial flooding on or off site, and would not impede or redirect flood flows. Impacts would be less than significant.

#### *Operation*

Given the upgrades of existing school and administrative sites would generally involve minimal exterior improvements and primarily interior modernization, this project category would not result in a change to impervious surfaces and would not alter runoff at a future project site. Therefore, upgrades of existing school and administrative sites would not result in impacts related to substantial flooding on or off site, and would not impede or redirect flood flows during operation. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative facilities would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site or impede or redirect flood flows. Impacts would be less than significant.

#### *Operation*

Operation of upgrades of existing school and administrative facilities would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site or impede or redirect flood flows. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative facilities would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site or impede or redirect flood flows. Impacts would be less than significant.

#### *Operation*

Operation of upgrades of existing school and administrative facilities would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site or impede or redirect flood flows. Impacts would be less than significant.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

Construction activities associated with joint-use facilities, including the installation of fields, walking tracks, parking, or other recreational facilities, would generally involve minimal ground disturbance and light equipment. Construction of pools would require deep excavation and other ground disturbance for associated facilities using heavy equipment. These activities do not present a significant change in drainage patterns that would result in flooding on or off site or redirect flood flows. Therefore, joint-use facilities development projects would not result in substantial flooding on or off site, and would not impede or redirect flood flows. Impacts would be less than significant.

#### *Operation*

Operation of joint-use facilities, including new fields and turf, replacement fencing, and stabilized walking tracks, would not be expected to increase impervious surfaces and result in changes to runoff at a future project site. However, implementation of new or expanded parking could result in an increase in stormwater discharge associated with an increased impervious surface. This increase could result in substantial flooding on or off site, which would be a potentially significant impact **(Impact-HWQ-17)**. Depending on the size of the parking increase, post-construction BMPs could be required. Small increases in parking are not likely to substantially alter runoff at a future project site. However, for larger parking lots, the post-construction BMPs would be designed to retain runoff (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), to reduce the discharge, which limits the potential for substantial flooding on or off site.

Mitigation measure **MM-HWQ-2** is included to require compliance with the most current MS4 Permit and JRMP requirements. The District would implement post-construction BMPs designed to retain runoff (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), to reduce the discharge, which further limits the potential for substantial flooding on or off site following construction activities. Therefore, with implementation of **MM-HWQ-2** and compliance with San Diego Municipal

Code Section 143.0145(f), joint-use facilities would not result in impacts related to substantial flooding on or off site, and would not impede or redirect flood flows during operation. Impacts would be less than significant with mitigation.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with joint-use facilities would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site or impede or redirect flood flows. Impacts would be less than significant.

#### *Operation*

**Impact-HWQ-17: Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of Joint-Use Facilities.** Operation activities associated with joint-use facilities could alter the existing drainage pattern of the site or area, and could result in substantial flooding on or off site or impede or redirect flood flows. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-17:**

Implement **MM-HWQ-2,** as described above**.**

### Level of Significance After Mitigation

### Construction

Construction activities associated with joint-use facilities would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site or impede or redirect flood flows. Impacts would be less than significant.

#### *Operation*

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of joint-use facilities would not violate any water quality standards or WDRs, and **Impact-HWQ-17** would be reduced to less-than-significant levels.

# Site-Specific Analysis

## Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.9-5 above.

### Construction

The majority of surface runoff in the region is handled in the storm drain systems as there are no large river or stream flows that create flood conditions. Near-term, site-specific whole site modernization projects adjacent to a flood zone that could experience flood conditions during large storm events include Barnard Elementary School and Correia Middle School. However, during construction activities, drainage systems at all near-term, site-specific whole site modernization project sites would be temporarily modified, which could result in localized flooding. This would be a potentially significant impact **(Impact-HWQ-15)**. Water use during construction activities does not generally generate enough volume to create flooding conditions, and construction activities associated with near-term, site-specific whole site modernization projects that would disturb more than 1 acre of land would be required to comply with the Construction General Permit, which would require development and implementation of a SWPPP. For projects under 1 acre of land, site-specific construction activities would implement construction BMPs, consistent with the City of San Diego's JRMP.

Implementation of **MM-HWQ-1** would ensure compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable. Implementation of construction BMPs would control site run on and runoff to limit the potential for offsite flooding. BMPs would ensure the drainage system stays operational and is not altered significantly from the existing condition, which would ensure water volumes and velocities would be accommodated from construction-related water use and during a storm event. In addition, the flood zones would be kept free of construction equipment during storm events to ensure near-term, site-specific whole site modernization projects would not impede or redirect flood flows. Therefore, impacts related to flooding on or off site as a result of an increase of impervious surfaces and impeding or redirecting flood flows would be less than significant with mitigation.

### Operation

During operation of the near-term, site-specific whole site modernization projects, the impervious surface area could increase compared to the existing conditions. Consequently, the amount of stormwater runoff would also increase, which could increase the amount of runoff from near-term, site-specific whole site modernization projects. This increase could result in substantial flooding on or off site, which would be a potentially significant impact **(Impact-HWQ-16)**. As discussed under Threshold 1, the District would comply with implementation of post-construction BMPs as detailed in the City's JRMP. Implementation of **MM-HWQ-2** would require compliance with the most current MS4 Permit and JRMP requirements. The District would implement post-construction BMPs designed to retain runoff (i.e., intercept, store, infiltrate, evaporate, and evapotranspire) to reduce the discharge, which further limits the potential for substantial flooding on or off site following construction activities. Therefore, with implementation of **MM-HWQ-2** and compliance with San Diego Municipal Code Section 143.0145(f), near-term, site-specific whole site modernization projects would not result in impacts related to substantial flooding on or off site, and would not

impede or redirect flood flows during operation. **Impact-HWQ-16** would be less than significant with mitigation.

As shown on Figure 4.9-3, near-term, site-specific whole site modernization projects located within or adjacent to a flood zone include Barnard Elementary School and Correia Middle School. Development in the floodway is generally discouraged and must preclude a rise in the 100-year water surface elevation. Development in the flood fringe (area within the floodplain, but outside the floodway) is allowed subject to San Diego Municipal Code Section 143.0145(f). Development of near-term, site-specific whole site modernization projects within the flood zone would need to be elevated above flood levels and would comply with the City of San Diego's Municipal Code. Compliance with the Municipal Code would ensure that development would not result in substantial flooding on or off site, and would not impede or redirect flood flows.

## Level of Significance Prior to Mitigation

### Construction

**Impact-HWQ-15: Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could result in substantial flooding on or off site or impede or redirect flood flows. This is a potentially significant impact.

### Operation

**Impact-HWQ-16: Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of Whole Site Modernization Projects.** Operation activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could result in substantial flooding on or off site or impede or redirect flood flows. This is a potentially significant impact.

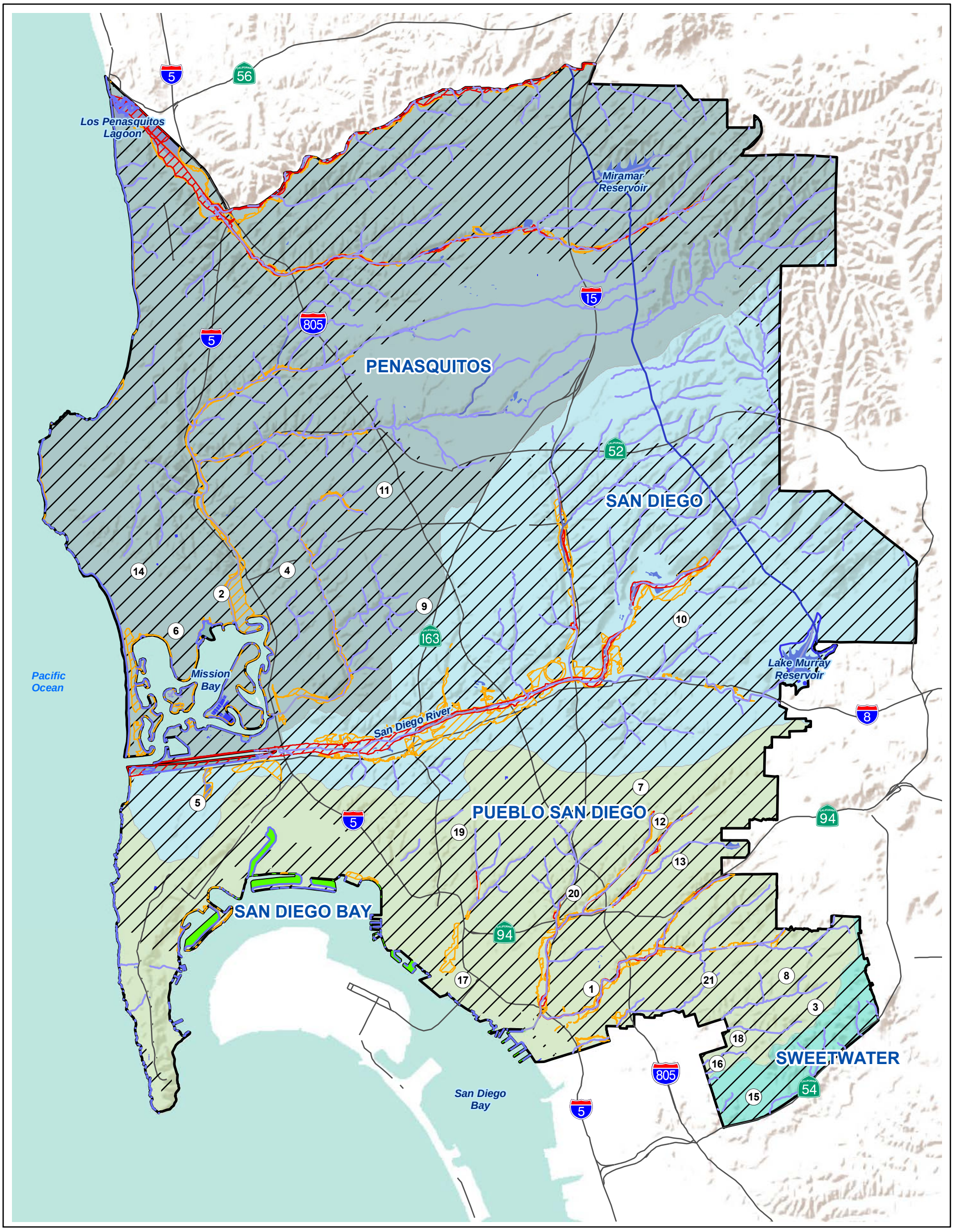
## Mitigation Measures

For **Impact-HWQ-15:**

Implement **MM-HWQ-1,** as described above**.**

For **Impact-HWQ-16**:

Implement **MM-HWQ-2,** as described above**.**




**Legend**

SDUSD Boundary

Watershed
- Penasquitos
- Pubelo San Diego
- San Diego
- San Diego Bay
- Sweetwater

Floodplain
- Area of Minimal Flood Hazard
- 0.2% Annual Chance Flood Hazard
- Floodway

National Hydrography Dataset (NHD)
- LakePond
- Reservoir
- SwampMarsh
- ArtificialPath
- CanalDitch
- Coastline
- Connector
- Pipeline
- StreamRiver
- Underground Conduit

(#) Site-Specific Projects
1-Baker Elementary School
2-Barnard Elementary School
3-Boone Elementary School
4-Clairemont High School
5-Correia Middle School
6-Crown Point Elementary School
7-Euclid Elementary School
8-Fulton K-8
9-Kearny High School
10-Lewis Middle School
11-Madison High School
12-Marshall Elementary School
13-Oak Park Elementary School
14-Pacific Beach Elementary School
15-Pacific View Leadership Elementary School
16-Paradise Hills Elementary School
17-Perkins K-8
18-Perry Elementary School
19-Roosevelt Middle School
20-Rowan Elementary School
21-Valencia Park Elementary School

Source:SanGIS (2019); ESRI

ICF

N

0 1.75 3.5 Miles

**Figure 4.9-3**
**Water Resources – Site-Specific Projects**

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## Level of Significance After Mitigation

### Construction

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of near-term, site-specific whole site modernization projects. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-15** would be reduced to less-than-significant levels.

### Operation

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of near-term, site-specific whole site modernization projects would not violate any water quality standards or WDRs, and **Impact-HWQ-16** would be reduced to less-than-significant levels.

***Threshold 3c: Would the Proposed Program substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would 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?***

# Program-Level Analysis

## New Acquisition and New School or Administrative Facilities

### Impact Discussion

#### *Construction*

Drainage systems could be temporarily modified during construction activities associated with new acquisition and new school or administrative facilities projects that could alter the drainage pattern, thus exceeding the capacities of existing storm drains, which would be potentially significant (**Impact-HWQ-18**). As identified in Threshold 1, **MM-HWQ-1** is included to identify compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable. Projects that disturb over an acre of land and soil would prepare and implement a SWPPP in accordance with the Construction General Permit, which would include several BMPs that would slow onsite runoff and ensure that the available capacity of the existing stormwater facilities would be sufficient for any small increase in BMP-treated runoff water. As a result, construction of the projects under this project category would not create or contribute runoff water that would exceed the available capacity of existing stormwater drainage systems. Also, as discussed above, BMPs implemented would also reduce the discharge of construction pollutants to the maximum extent practicable.

With implementation of **MM-HWQ-1,** impacts related to the alteration of existing drainage patterns during construction of new school or administrative facilities would not exceed stormwater drainage system capacities or provide substantial sources of additional pollutants. Impacts would be less than significant with mitigation.

***Operation***

Anticipated pollutants of concern expected from operation of new school or administrative facilities would include trash and debris, oil and grease, oxygen-demanding substances, bacteria and viruses, and heavy metals. Other potential pollutants of concern include pesticides and nutrients from landscape. All of these pollutants could discharge from future project sites, which would be potentially significant (**Impact-HWQ-19**). Mitigation measure **MM-HWQ-2** is included to identify compliance with the most current MS4 Permit and JRMP requirements. As described under Threshold 1, new school or administrative facilities would implement post-construction BMPs. Post-construction BMPs are the minimum management practices, control techniques, and design and engineering methods to be included in the planning design to reduce the discharge of pollutants from the development, and are intended to avoid or minimize water quality impacts by managing site hydrology, providing treatment features integrated within the site, and reducing or preventing the introduction of pollutants from specific sources. Implementation of post-construction BMPs would not only reduce pollutants discharged from a future project site but also reduce stormwater runoff generated by a future project site.

Implementation of **MM-HWQ-2** would ensure that operations of new school or administrative facilities 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, impacts would be less than significant with mitigation.

**Level of Significance Prior to Mitigation**

***Construction***

**Impact-HWQ-18: Potential for New School and Administrative Facilities to 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 During Construction.** Construction activities associated with new acquisition and new school or administrative facilities projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact.

***Operation***

**Impact-HWQ-19: Potential for New School and Administrative Facilities to 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 During Operation.** Operation activities associated with new acquisition and new school or administrative facilities projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-18:**

Implement **MM-HWQ-1,** as described above.

For **Impact-HWQ-19:**

Implement **MM-HWQ-2,** as described above**.**

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of new school or administrative facilities. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-18** would be reduced to less-than-significant levels.

#### *Operation*

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of new school or administrative facilities would not violate any water quality standards or WDRs, and **Impact-HWQ-19** would be reduced to less-than-significant levels.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

Drainage systems could be temporarily modified during construction activities associated with whole site modernization projects that could alter the drainage pattern, thus exceeding the capacities of existing storm drains, which would be potentially significant (**Impact-HWQ-20**). As identified in Threshold 1, **MM-HWQ-1** is included to identify compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable. Projects that disturb over an acre of land and soil would prepare and implement a SWPPP in accordance with the Construction General Permit, which would include several BMPs that would slow onsite runoff and ensure that the available capacity of the existing stormwater facilities would be sufficient for any small increase in BMP-treated runoff water. As a result, construction of the projects under this project category would not create or contribute runoff water that would exceed the available capacity of existing stormwater drainage systems. Also, as discussed above, BMPs implemented would also reduce the discharge of construction pollutants to the maximum extent practicable.

With implementation of **MM-HWQ-1,** impacts related to the alteration of existing drainage patterns during construction of whole site modernization projects would not exceed stormwater drainage system capacities or provide substantial sources of additional pollutants. Impacts would be less than significant with mitigation.

***Operation***

Anticipated pollutants of concern expected from operation of whole site modernization projects would include trash and debris, oil and grease, oxygen-demanding substances, bacteria and viruses, and heavy metals. Other potential pollutants of concern include pesticides and nutrients from landscape. All of these pollutants could discharge from future project sites, which would be potentially significant (**Impact-HWQ-21**). Mitigation measure **MM-HWQ-2** is included to identify compliance with the most current MS4 Permit and JRMP requirements. As described under Threshold 1, whole site modernization projects would implement post-construction BMPs. Post-construction BMPs are the minimum management practices, control techniques, and design and engineering methods to be included in the planning design to reduce the discharge of pollutants from the development, and are intended to avoid or minimize water quality impacts by managing site hydrology, providing treatment features integrated within the site, and reducing or preventing the introduction of pollutants from specific sources. Implementation of post-construction BMPs would not only result in a reduction in pollutants discharged from a future project site but also in stormwater runoff generated by a future project site. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-HWQ-20: Potential for Whole Site Modernization Projects to 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 During Construction.** Construction activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact.

***Operation***

**Impact-HWQ-21: Potential for Whole Site Modernization Projects to 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 During Operation.** Operation activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-20:**

Implement **MM-HWQ-1,** as described above.

For **Impact-HWQ-21:**

Implement **MM-HWQ-2,** as described above**.**

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of whole site modernization projects. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-20** would be reduced to less-than-significant levels.

#### *Operation*

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of whole site modernization projects would not violate any water quality standards or WDRs, and **Impact-HWQ-21** would be reduced to less-than-significant levels.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would generally result in minimal or no ground disturbing activities and would not require the use of heavy equipment. The construction period would typically last less than a year. Given the upgrades would generally involve minimal exterior improvements and primarily interior modernization, this project category would not result in alteration of existing drainage patterns during construction, which could exceed stormwater drainage system capacities or provide substantial sources of additional pollutants. Impacts would be less than significant.

#### *Operation*

Given the upgrades of existing school and administrative site would generally involve minimal exterior improvements and primarily interior modernization, this project category would not result in a change to impervious surfaces and would not alter runoff at a future project site. Therefore, upgrades of existing school and administrative facilities would not exceed stormwater drainage system capacities or provide substantial sources of additional pollutants. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would not result in alteration of existing drainage patterns during construction, which could exceed stormwater drainage system capacities or provide substantial sources of additional pollutants. Impacts would be less than significant.

***Operation***

Operational activities associated with upgrades of existing school and administrative sites would not result in alteration of existing drainage patterns during operation, which could exceed stormwater drainage system capacities or provide substantial sources of additional pollutants. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

***Construction***

Construction activities associated with upgrades of existing school and administrative sites would not result in alteration of existing drainage patterns during construction, which could exceed stormwater drainage system capacities or provide substantial sources of additional pollutants. Impacts would be less than significant and no mitigation is required.

***Operation***

Operational activities associated with upgrades of existing school and administrative sites would not result in alteration of existing drainage patterns during operation, which could exceed stormwater drainage system capacities or provide substantial sources of additional pollutants. Impacts would be less than significant and no mitigation is required.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

***Construction***

Construction activities associated with joint-use facilities projects, which include the installation of fields, walking tracks, parking, or other recreational facilities, would generally involve minimal ground disturbance and light equipment. Construction of pools would require deep excavation and other ground disturbance for associated facilities using heavy equipment, which would be potentially significant (**Impact-HWQ-22**). There is a potential for pollutants to be discharged from the minimal ground disturbance and pool construction. Depending on the size of the disturbance, compliance with the Construction General Permit may be required. For projects under 1 acre of land, construction BMPs would also be implemented, consistent with the City's JRMP.

Mitigation measure **MM-HWQ-1** is included to identify compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable. With implementation of construction BMPs required as part of **MM-HWQ-1**, joint-use facility projects would not exceed stormwater drainage system capacities or provide substantial sources of additional pollutants during construction. Impacts would be less than significant with mitigation.

### Operation

Operation of joint-use facilities projects, which include new fields and turf, replacement fencing, and stabilized walking tracks, would not be expected to increase impervious surfaces and result in

changes to runoff at a future project site or pollutant loads. However, implementation of new or expanded parking could result in an increase in stormwater discharge associated with an increased impervious surface that could exceed stormwater drainage system capacities or provide substantial sources of additional pollutants, which would be potentially significant (**Impact-HWQ-23**). Depending on the size of the parking increase, post-construction BMPs could be required. Small increases in parking are not likely to substantially alter runoff at a future project site or provide additional sources of pollutants. However, for larger parking lots, the post-construction BMPs would be designed to retain runoff (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), to reduce the discharge, which limits the potential for the Proposed Program to exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. With implementation of post-construction BMPs, as determined through implementation of **MM-HWQ-2**, joint-use facilities projects would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff during operations. Impacts would be less than significant with mitigation.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-HWQ-22: Potential for Joint-Use Facilities to 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 During Construction.** Construction activities associated with joint-use facilities projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact.

#### *Operation*

**Impact-HWQ-23: Potential for Joint-Use Facilities to 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 During Operation.** Operation activities associated with joint-use facilities projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-22**:

Implement **MM-HWQ-1,** as described above.

For **Impact-HWQ-23:**

Implement **MM-HWQ-2,** as described above**.**

#### Level of Significance After Mitigation

***Construction***

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of joint-use facilities. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-22** would be reduced to less-than-significant levels.

***Operation***

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of joint-use facilities would not violate any water quality standards or WDRs, and **Impact-HWQ-23** would be reduced to less-than-significant levels.

## Site-Specific Analysis

### Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.9-5 above.

#### Construction

Drainage systems could be temporarily modified during construction and could alter the drainage pattern, thus exceeding the capacities of existing storm drains, which would be potentially significant (**Impact-HWQ-20**). As identified in Threshold 1, **MM-HWQ-1** is included to identify compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable. Projects that disturb over an acre of land and soil would prepare and implement a SWPPP in accordance with the Construction General Permit, which would include several BMPs that would slow onsite runoff and ensure that the available capacity of the existing stormwater facilities would be sufficient for any small increase in BMP-treated runoff water. As a result, construction of the near-term, site-specific whole site modernization projects would not create or contribute runoff water that would exceed the available capacity of existing stormwater drainage systems. Also, as discussed above, BMPs implemented would also reduce the discharge of construction pollutants to the maximum extent practicable.

#### Operation

Anticipated pollutants of concern expected from operation of near-term, site-specific whole site modernization projects would include trash and debris, oil and grease, bacteria and viruses, heavy metals, and pesticides. All of these pollutants could discharge from the near-term, site-specific whole site modernization projects, which would be a potentially significant impact (**Impact-HWQ-21**). Mitigation measure **MM-HWQ-2** is included to identify compliance with the most current MS4 Permit and JRMP requirements. As described under Threshold 1, near-term, site-specific whole site modernization projects would implement post-construction BMPs. Post-construction BMPs are the minimum management practices, control techniques, and design and engineering methods to be

included in the planning design to reduce the discharge of pollutants from the development, and are intended to avoid or minimize water quality impacts by managing site hydrology, providing treatment features integrated within the site, and reducing or preventing the introduction of pollutants from specific sources. Implementation of post-construction BMPs would not only result in a reduction in pollutants discharged from a future project site but also in stormwater runoff generated by near-term, site-specific whole site modernization projects.

## Level of Significance Prior to Mitigation

### Construction

**Impact-HWQ-20: Potential for Whole Site Modernization Projects to 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 During Construction.** Construction activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact.

### Operation

**Impact-HWQ-21: Potential for Whole Site Modernization Projects to 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 During Operation.** Operation activities associated with whole site modernization projects could alter the existing drainage pattern of the site or area, and could 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. This is a potentially significant impact.

## Mitigation Measures

For **Impact-HWQ-20:**

Implement **MM-HWQ-1,** as described above.

For **Impact-HWQ-21:**

Implement **MM-HWQ-2,** as described above**.**

## Level of Significance After Mitigation

### Construction

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of near-term, site-specific whole site modernization projects. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-20** would be reduced to less-than-significant levels.

#### Operation

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of near-term, site-specific whole site modernization projects would not violate any water quality standards or WDRs, and **Impact-HWQ-21** would be reduced to less-than-significant levels.

***Threshold 4: In flood hazard, tsunami, or seiche zones, would the Proposed Program risk release of pollutants due to project inundation?***

## Program-Level Analysis

### All Project Categories

#### Impact Discussion

##### *Construction and Operation*

CEQA does not require an analysis of how the existing environmental conditions will affect a project's residents or users unless the project would exacerbate those conditions. Therefore, when discussing impacts of the environment on the project, such as flood hazard associated with tsunami or seiche, the analysis will first determine if there is a potential for the project to exacerbate the issue. If evidence indicates it would not, then the analysis will conclude by stating such. If it would potentially exacerbate the issue, then evidence is provided to determine if the exacerbation would or would not be significant.

The City of San Diego is partially within a designated tsunami hazard zone; however, existing school sites are located outside the tsunami zone. Therefore, students and employees would not likely be subject to the risk of this hazard. Conditions under the Proposed Program would be similar to the existing conditions and would not increase the potential of seiche or tsunami wave run-up. In addition, the likelihood of such an event occurring during the construction and operation period is considered low. The majority of school sites are not located in flood zones. However, there are some school sites that are located adjacent to creeks and rivers that are located in and adjacent to a flood zone.

The Proposed Program conditions would be similar to existing conditions in terms of inundation, and the school sites would not exacerbate inundation by flood zone, seiche, or tsunami. School sites do not typically store pollutants and other hazardous materials or conduct hazardous activities that could result in risk of release of pollutants due to project inundation. As such, while inundation from a flood zone, tsunami, or seiche is possible, it is unlikely; and, if it were to occur, it would not result in a significant release of pollutants due to inundation. While it is reasonably foreseeable that inundation from a flood zone, seiche, or tsunami could occur, the Proposed Program would not significantly exacerbate the risk of release of pollutants. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with the Proposed Program would not risk the release of pollutants due to project inundation within a flood hazard, tsunami, or seiche zone.

#### *Operation*

Operation of the Proposed Program would not risk the release of pollutants due to project inundation within a flood hazard, tsunami, or seiche zone.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with the Proposed Program would not risk the release of pollutants due to project inundation within a flood hazard, tsunami, or seiche zone.

#### *Operation*

Operation of the Proposed Program would not risk the release of pollutants due to project inundation within a flood hazard, tsunami, or seiche zone.

## Site-Specific Analysis

### Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.9-5 above.

### Construction and Operation

As described above, CEQA does not require an analysis of how the existing environmental conditions will affect a project's residents or users unless the project would exacerbate those conditions. The City of San Diego is partially within a designated tsunami hazard zone; however, near-term, site-specific whole site modernization projects are located outside the tsunami zone. Therefore, students and employees would not likely be subject to the risk of this hazard. Conditions at the near-term, site-specific whole site modernization project sites would be similar to the existing conditions and would not increase the potential of seiche or tsunami wave run-up. In addition, the likelihood of such an event occurring during the construction and operation period is considered low. As shown on Figure 4.9-3, the near-term, site-specific whole site modernization projects located in and adjacent to a flood zone are Barnard Elementary School and Correia Middle School.

Conditions where near-term, site-specific whole site modernization projects are located would be similar to existing conditions in terms of inundation, and the school sites would not exacerbate inundation by flood zone, seiche, or tsunami. School sites do not typically store pollutants and other hazardous materials or conduct hazardous activities that could result in risk of release of pollutants due to project inundation. As such, similar to the *Program-Level Analysis*, while inundation from

a flood zone, tsunami, or seiche is possible, it is unlikely, and, if it were to occur, it would not result in a significant release of pollutants due to inundation. While it is reasonably foreseeable that inundation from a flood zone, seiche, or tsunami could occur, the near-term, site-specific whole site modernization projects would not significantly exacerbate the risk of release of pollutants.

### Level of Significance Prior to Mitigation

#### Construction and Operation

Construction and operational activities associated the near-term, site-specific whole site modernization projects would not risk the release of pollutants due to project inundation within a flood hazard, tsunami, or seiche zone.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### Construction and Operation

Construction and operation impacts were determined to be less than significant prior to mitigation. No mitigation is required.

***Threshold 5: Would the Proposed Program conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

As discussed under Threshold 1, construction activities associated with new school or administrative facilities could violate water quality standards or WDRs, and impacts would be potentially significant (**Impact-HWQ-1**). Under this project category, projects over 1 acre would be covered under the Construction General Permit and would implement BMPs to reduce or prevent runoff pollution. For projects under 1 acre of land, construction BMPs would also be implemented, consistent with the City of San Diego's JRMP.

New school or administrative facilities projects may result in temporary groundwater impacts during construction but would not utilize groundwater resources. Also, this project category would comply with the Groundwater Dewatering Permit, as needed. As such, new school or administrative facilities projects are not anticipated to conflict with a sustainable groundwater management plan.

Mitigation measure **MM-HWQ-1** is included to ensure compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable. Therefore, new school or administrative facilities projects would not be in conflict with or obstruct implementation of the

applicable water quality control plan in the Proposed Program area. Impacts would be less than significant with mitigation.

***Operation***

New school or administrative facilities would result in increased development compared to existing conditions, which would increase the pollutants generated and discharged. Therefore, new school or administrative facilities projects could result in potentially significant impacts related to a violation of water quality standards or WDRs during operation activities (**Impact-HWQ-2**). The District is not subject to the City's MS4 Permit; however, future iterations of the MS4 Permit are anticipated to include the District as a non-traditional permittee (SWRCB 2018). Therefore, new school or administrative facilities projects would comply with the City's MS4 Permit and include post-construction BMPs to reduce the discharge of pollutants from the sites. New school or administrative facilities projects would not utilize groundwater resources and would not conflict with or obstruct implementation of a sustainable groundwater management plan.

Mitigation measure **MM-HWQ-2** is included to ensure compliance with the most current MS4 Permit and JRMP requirements. Therefore, with implementation of post-construction BMPs, new school or administrative facilities projects would not conflict with or obstruct implementation of the applicable water quality control plan. New school or administrative facilities projects would not utilize groundwater resources and would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts would be less then significant with mitigation.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-HWQ-1: Potential for New School or Administrative Facilities to Violate Water Quality Standards or Waste Discharge Requirements During Construction.** Construction activities associated with new school or administrative facilities projects could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

***Operation***

**Impact-HWQ-2: Potential for New School or Administrative Facilities to Violate Water Quality Standards or Waste Discharge Requirements During Operation.** Operation activities associated with new school or administrative facilities projects could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-1:**

Implement **MM-HWQ-1,** as described above.

For **Impact-HWQ-2:**

Implement **MM-HWQ-2,** as described above**.**

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of new school or administrative facilities. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-1** would be reduced to less-than-significant levels.

#### *Operation*

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of new school or administrative facilities would not violate any water quality standards or WDRs, and **Impact-HWQ-2** would be reduced to less-than-significant levels.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

As discussed under Threshold 1, construction activities associated with whole site modernization projects could violate water quality standards or WDRs, and impacts would be potentially significant (**Impact-HWQ-3**). Under this project category, projects over 1 acre would be covered under the Construction General Permit and would implement BMPs to reduce or prevent runoff pollution. For projects under 1 acre of land, construction BMPs would also be implemented, consistent with the City of San Diego's JRMP.

Whole site modernization projects may result in temporary groundwater impacts during construction but would not utilize groundwater resources. Also, this project category would comply with the Groundwater Dewatering Permit, as needed. As such, whole site modernization projects are not anticipated to conflict with a sustainable groundwater management plan.

Mitigation measure **MM-HWQ-1** is included to ensure compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable. Therefore, whole site modernization projects would not be in conflict with or obstruct implementation of the applicable water quality control plan in the Proposed Program area. Impacts would be less than significant with mitigation.

#### *Operation*

Whole site modernization projects would result in increased development compared to existing conditions, which would increase the pollutants generated and discharged. Therefore, whole site modernization projects could result in potentially significant impacts related to a violation of water quality standards or WDRs during operation activities (**Impact-HWQ-4**). The District is not subject to the City's MS4 Permit; however, future iterations of the MS4 Permit are anticipated to include the District as a non-traditional permittee (SWRCB 2018). Therefore, whole site modernization projects

would comply with the City's MS4 Permit and include post-construction BMPs to reduce the discharge of pollutants from the sites. Whole site modernization projects would not utilize groundwater resources and would not conflict with or obstruct implementation of a sustainable groundwater management plan.

Mitigation measure **MM-HWQ-2** is included to ensure compliance with the most current MS4 Permit and JRMP requirements. Therefore, with implementation of post-construction BMPs, whole site modernization projects would not conflict with or obstruct implementation of the applicable water quality control plan. Whole site modernization projects would not utilize groundwater resources and would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts would be less then significant with mitigation.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-HWQ-3: Potential Violate Water Quality Standards or Waste Discharge Requirements During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

#### *Operation*

**Impact-HWQ-4: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of Whole Site Modernization Projects.** Operation activities associated with whole site modernization projects could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-3:**

Implement **MM-HWQ-1,** as described above.

For **Impact-HWQ-4:**

Implement **MM-HWQ-2,** as described above**.**

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of whole site modernization projects. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-3** would be reduced to less-than-significant levels.

#### *Operation*

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of whole site modernization projects would not violate any water quality standards or WDRs, and **Impact-HWQ-4** would be reduced to less-than-significant levels.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would generally result in minimal or no ground disturbing activities and would not require the use of heavy equipment. The construction period would typically last less than a year. Given the upgrades would generally involve minimal exterior improvements and primarily interior modernization, this project category would not conflict with or obstruct implementation of the applicable water quality control plan or a sustainable groundwater management plan.

#### *Operation*

Given the upgrades of existing school and administrative sites would generally involve minimal exterior improvements and primarily interior modernization, this project category would not result in water quality impacts or utilize groundwater resources and would not conflict with or obstruct implementation of the applicable water quality control plan or sustainable groundwater management plan.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative facilities would not result in a violation of a water quality standard or WDR during construction activities, with implementation of construction BMPs as needed. Impacts would be less than significant.

#### *Operation*

Operations following upgrades of existing school and administrative facilities would not result in a violation of a water quality standard with implementation of post-construction BMPs as needed. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would not result in a violation of a water quality standard or WDR during construction activities, with implementation of construction BMPs as needed. Impacts would be less than significant.

#### *Operation*

Operations following upgrades of existing school and administrative sites would not result in a violation of a water quality standard with implementation of post-construction BMPs as needed. Impacts would be less than significant.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

Construction activities associated with joint-use facilities projects, including installation of fields, walking tracks, parking, or other recreational facilities, would generally involve minimal ground disturbance and light equipment. Depending on the size of the disturbance, construction of this project category may impair water quality (**Impact-HWQ-5**), and compliance with the Construction General Permit or the City of San Diego's JRMP may be required. Mitigation measure **MM-HWQ-1** is included to ensure compliance with the Construction General Permit or City of San Diego's JRMP for construction activities, as applicable. Therefore, joint-use facilities projects would not conflict with or obstruct implementation of the applicable water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant with mitigation.

### Operation

Operation of joint-use facilities projects, including new fields and turf, replacement fencing, and stabilized walking tracks, would not conflict with or obstruct implementation of a sustainable groundwater management plan. However, implementation of new or expanded parking could result in an increase in discharge of pollutants associated with parked cars, which could impair water quality (**Impact-HWQ-6**). Mitigation measure **MM-HWQ-2** requires the District to complete the City of San Diego's Storm Water Requirements Applicability Checklist (Form DS-560) to determine if the project is a PDP, SDP, or Exempt and to determine which stormwater requirements apply. Depending on the size of the parking increase, post-construction BMPs could be required to prevent the release of pollutants to surface waters during the functional life of the parking. Joint-use facilities projects would not substantially affect groundwater resources and would not conflict with or obstruct implementation of a sustainable groundwater management plan.

With implementation of **MM-HWQ-2**, joint-use facilities projects would not conflict with or obstruct implementation of the applicable water quality control plan. Joint-use facilities would not substantially affect groundwater resources and would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts would be less than significant with mitigation.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-HWQ-5: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of Joint-Use Facilities.** Construction activities associated with joint-use facilities project could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

#### *Operation*

**Impact-HWQ-6: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of Joint-Use Facilities.** Operation activities associated with joint-use facilities projects could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

### Mitigation Measures

For **Impact-HWQ-5**:

Implement **MM-HWQ-1,** as described above.

For **Impact-HWQ-6:**

Implement **MM-HWQ-2,** as described above**.**

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of joint-use facilities. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-5** would be reduced to less-than-significant levels.

#### *Operation*

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of joint-use facilities would not violate any water quality standards or WDRs, and **Impact-HWQ-6** would be reduced to less-than-significant levels.

## Site-Specific Analysis

### Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.9-5 above.

### Construction

Similar to the Proposed Program, construction activities associated with the near-term, site-specific whole site modernization projects could violate water quality standards or WDRs, and impacts would be potentially significant (**Impact-HWQ-3**). As described under Threshold 1, projects over 1 acre would be covered under the Construction General Permit and would implement BMPs to reduce or prevent runoff pollution. For projects under 1 acre of land, near-term, site-specific whole site modernization project construction BMPs would also be implemented, consistent with the City of San Diego's JRMP. As with the Proposed Program, **MM-HWQ-1** is included to ensure compliance with the Construction General Permit or the City of San Diego's JRMP for construction activities, as applicable. Therefore, near-term, site-specific whole site modernization projects would not be in conflict with or obstruct implementation of the applicable water quality control plan in the Program area. Impacts would be less than significant with mitigation.

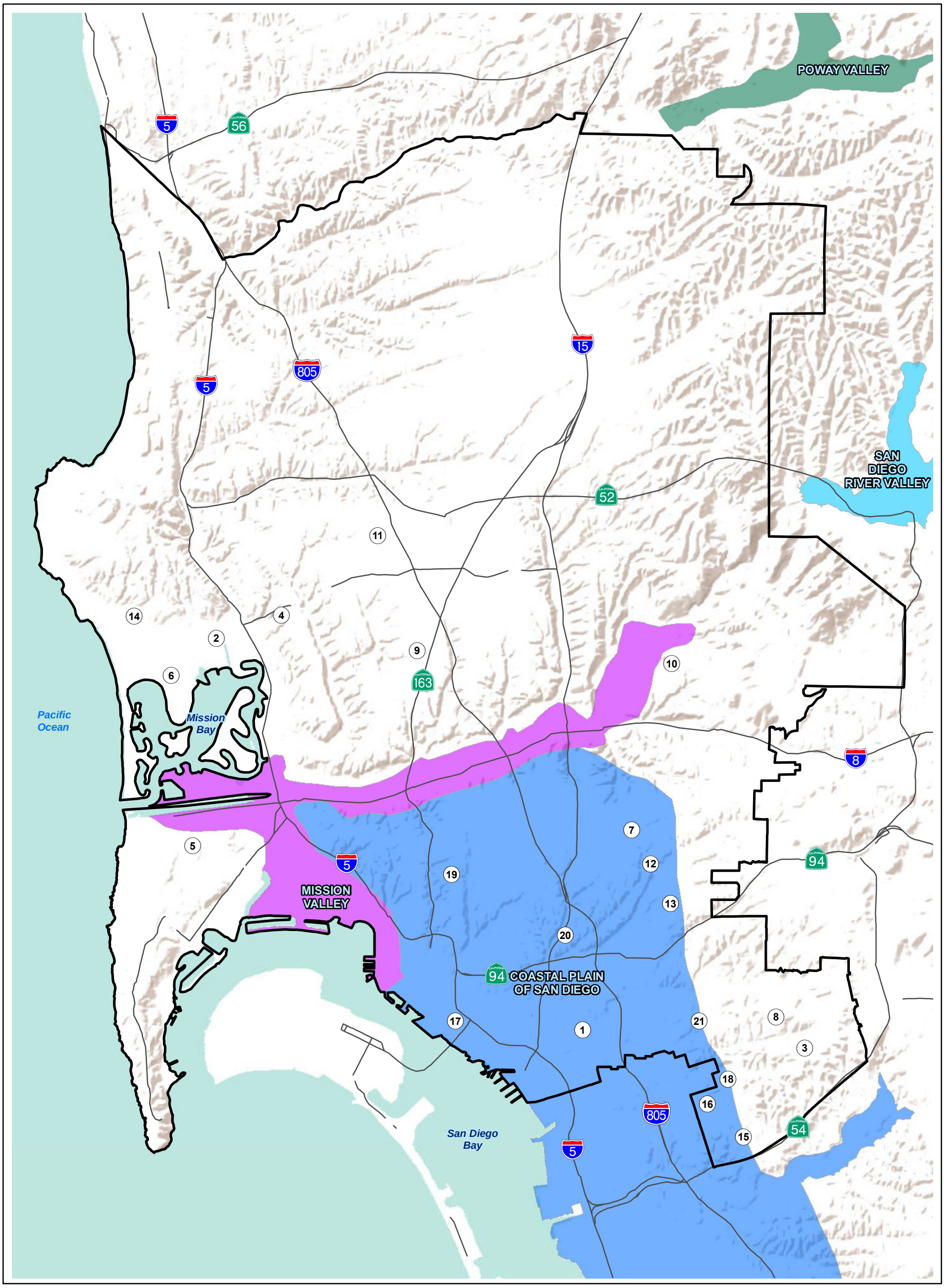
The groundwater basins wherein near-term, site-specific whole site modernization projects are located are shown on Figure 4.9-4. Near-term, site-specific whole site modernization projects may result in temporary groundwater impacts during construction but would not utilize groundwater resources. Similar to the Proposed Program, near-term, site-specific whole site modernization projects would also comply with the Groundwater Dewatering Permit, as needed. As such, near-term, site-specific whole site modernization projects are not anticipated to conflict with a sustainable groundwater management plan. Impacts would be less than significant.

### Operation

Similar to the Proposed Program, near-term, site-specific whole site modernization projects would result in increased development compared to existing conditions, which would increase the pollutants generated and discharged. Therefore, near-term, site-specific whole site modernization projects could result in potentially significant impacts related to a violation of water quality standards or WDRs during operation activities (**Impact-HWQ-4**). As described above, the District is not subject to the City's MS4 Permit; however, future iterations of the MS4 Permit are expected to include the District as a non-traditional permittee (SWRCB 2018). Therefore, near-term, site-specific whole site modernization projects would comply with the City's MS4 Permit and include post-construction BMPs to reduce the discharge of pollutants from the sites. Mitigation measure **MM-HWQ-2** is included to ensure compliance with the most current MS4 Permit and JRMP requirements. Therefore, with implementation of post-construction BMPs, the Proposed Program would not conflict with or obstruct implementation of the applicable water quality control plan. Near-term, site-specific whole site modernization projects would not utilize groundwater resources and would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts would be less then significant with mitigation.

Near-term, site-specific whole site modernization projects would not utilize groundwater resources and would not conflict with or obstruct implementation of a sustainable groundwater management plan.

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**Legend**

SDUSD Boundary

Groundwater Basins

- Coastal Plain of San Diego
- Mission Valley
- Poway Valley
- San Diego River Valley

(#) Site-Specific Projects

1-Baker Elementary School
2-Barnard Elementary School
3-Boone Elementary School
4-Clairemont High School
5-Correia Middle School
6-Crown Point Elementary School
7-Euclid Elementary School
8-Fulton K-8
9-Kearny High School
10-Lewis Middle School
11-Madison High School
12-Marshall Elementary School
13-Oak Park Elementary School
14-Pacific Beach Elementary School
15-Pacific View Leadership Elementary School
16-Paradise Hills Elementary School
17-Perkins K-8
18-Perry Elementary School
19-Roosevelt Middle School
20-Rowan Elementary School
21-Valencia Park Elementary School

Source:SanGIS (2019); ESRI

ICF

N

0 1.75 3.5 Miles

**Figure 4.9-4**
**Groundwater Basins – Site-Specific Projects**
**SDUSD Program EIR**

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## Level of Significance Prior to Mitigation

### Construction

**Impact-HWQ-3: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

### Operation

**Impact-HWQ-4: Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of Whole Site Modernization Projects.** Operation activities associated with whole site modernization projects could degrade water quality by increasing polluted stormwater runoff, which could contribute to water quality degradation. This is a potentially significant impact.

## Mitigation Measures

For **Impact-HWQ-3**:

Implement **MM-HWQ-1,** as described above.

For **Impact-HWQ-4:**

Implement **MM-HWQ-2,** as described above**.**

## Level of Significance After Mitigation

### Construction

Implementation of **MM-HWQ-1**, which requires erosion control, sediment control, non-stormwater management, and waste management construction BMPs as required by the Construction General Permit or City of San Diego's JRMP, would reduce impacts in regard to violation of a water quality standard or WDR during construction of near-term, site-specific whole site modernization projects. Therefore, with the implementation of **MM-HWQ-1, Impact-HWQ-3** would be reduced to less-than-significant levels.

### Operation

Implementation of site-specific LID features and pollutant control BMPs, in accordance with the City's MS4 Permit, would filter potential pollutants from runoff prior to discharge into receiving waters and reduce the adverse impact on water quality. Therefore, with implementation of post-construction BMPs, as required in **MM-HWQ-2**, operations of near-term, site-specific whole site modernization projects would not violate any water quality standards or WDRs, and **Impact-HWQ-4** would be reduced to less-than-significant levels.

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# Section 4.10
# Noise and Vibration

## 4.10.1 Overview

This section describes the existing conditions and applicable laws and regulations governing Program-related noise and vibration. The section also discusses the Proposed Program's potential to increase noise and vibration in the project vicinity during construction and operation. Impacts related to noise and vibration were analyzed by ICF noise specialists and considered significant if the Proposed Program would (1) generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of reasonably foreseeable future projects, in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies; (2) generate excessive groundborne vibration or groundborne noise levels; or (3) for a reasonably foreseeable future project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, expose people residing or working in the Program area to excessive noise levels.

Table 4.10-1 summarizes the significant impacts and mitigation measures (MMs) discussed in Section 4.10.6.4, *Impacts and Mitigation Measures*.

**Table 4.10-1. Summary of Significant Noise and Vibration Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact-NOI-1:** Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of New School or Administrative Facilities. | **MM-NOI-1**: Conduct Site-Specific Reviews of Noise Impacts and, if Warranted, Conduct Additional Analyses; **MM-NOI-2**: Prohibit Exterior Construction Activities Outside of the City of San Diego's Permitted Construction Hours; **MM-NOI-3:** Avoid Construction Within the Calculated Screening Distances of Noise-Sensitive Receptors; **MM-NOI-4**: Implement General Best Practices for Construction Noise Abatement; **MM-NOI-5:** Install Temporary Noise Barriers to Shield Noise-Sensitive Receptors from | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | Excessive Construction Noise Levels; **MM-NOI-6:** Avoid or Reduce Construction Noise from Pile Driving. | | |
| **Impact-NOI-2:** Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to New School or Administrative Facilities. | **MM-NOI-1**: Conduct Site-Specific Reviews of Noise Impacts and, if Warranted, Conduct Additional Analyses; **MM-NOI-3:** Avoid Construction Within the Calculated Screening Distances of Noise-Sensitive Receptors; **MM-NOI-4**: Implement General Best Practices for Construction Noise Abatement; **MM-NOI-5:** Install Temporary Noise Barriers to Shield Noise-Sensitive Receptors from Excessive Construction Noise Levels; **MM-NOI-6:** Avoid or Reduce Construction Noise from Pile Driving; **MM-NOI-7**: Coordinate Construction Activities to Avoid or Minimize Excessive Noise at Occupied Onsite Learning Spaces. | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |
| **Impact-NOI-3:** Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips at New School or Administrative Facilities. | **MM-NOI-8:** Conduct a Traffic Noise Analysis to Quantify the Traffic Effects of New District Sites; **MM-NOI-9:** Plan Access Routes for New District Sites to Avoid Noise-Sensitive Land Uses and/or Encourage Use of Major Arterials as Opposed to Smaller Local Streets. | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |
| **Impact-NOI-4:** Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the | **MM-NOI-10**: Apply Administrative Controls and Incorporate Public Address System Design Features to Reduce Operational Noise Levels During All Use (School and | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| Limits Specified in the City of San Diego Municipal Code During Operation of New School or Administrative Facilities. | Joint Use) of Any New or Redesigned Major Athletic Facilities; **MM-NOI-11:** Design and Install All New or Substantially Altered Mechanical Systems to Ensure All Mechanical Equipment Complies with Section 59.5.0401 of the City of San Diego Municipal Code at Nearby Noise-Sensitive Receptors; **MM-NOI-12:** Design and Develop All Other New, Expanded, or Relocated Exterior Noise Sources so that Operational Noise Does Not Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use Resulting in an Exceedance of Section 59.5.0401 of the City of San Diego Municipal Code. | | specified in the City's Municipal Code. |
| **Impact-NOI-13:** Exceed Caltrans Guideline Criteria for Potential Building Damage During Project Construction. | **MM-NOI-16:** Avoid or Reduce Potentially Damaging Vibration at Nearby Buildings from Program Construction. | Less than Significant | Construction equipment that could produce potentially damaging vibration will be prohibited within the damage threshold distances. Therefore, damage to buildings from vibration would be avoided. |
| **Impact-NOI-14:** Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Offsite Sensitive Receptors During Project Construction. | **MM-NOI-17:** Avoid or Reduce Potentially Annoying Vibration at Occupied Sensitive Offsite Buildings During Project Construction. | Significant and Unavoidable | It may not be possible to fully implement **MM-NOI-17** and reduce groundborne vibration to less than 0.04 in/sec PPV at all nearby sensitive receptors. |
| **Impact-NOI-15:** Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Occupied Onsite Learning Spaces | **MM-NOI-18:** Avoid or Reduce Potentially Annoying Vibration at Occupied Onsite Learning Spaces During Program Construction. | Significant and Unavoidable | It may not be possible to fully implement **MM-NOI-18** and reduce groundborne vibration to less than 0.04 in/sec |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| During Project Construction. | | | PPV at all onsite learning spaces. |
| **Whole Site Modernization** | | | |
| **Impact-NOI-5:** Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of Whole Site Modernization Projects. | **MM-NOI-1**: Conduct Site-Specific Reviews of Noise Impacts and, if Warranted, Conduct Additional Analyses; **MM-NOI-2**: Prohibit Exterior Construction Activities Outside of the City of San Diego's Permitted Construction Hours; **MM-NOI-3:** Avoid Construction Within the Calculated Screening Distances of Noise-Sensitive Receptors; **MM-NOI-4**: Implement General Best Practices for Construction Noise Abatement; **MM-NOI-5:** Install Temporary Noise Barriers to Shield Noise-Sensitive Receptors from Excessive Construction Noise Levels; **MM-NOI-6:** Avoid or Reduce Construction Noise from Pile Driving. | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |
| **Impact-NOI-6:** Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to Whole Site Modernization Projects. | **MM-NOI-1**: Conduct Site-Specific Reviews of Noise Impacts and, if Warranted, Conduct Additional Analyses; **MM-NOI-3:** Avoid Construction Within the Calculated Screening Distances of Noise-Sensitive Receptors; **MM-NOI-4**: Implement General Best Practices for Construction Noise Abatement; **MM-NOI-5:** Install Temporary Noise Barriers to Shield Noise-Sensitive Receptors from Excessive Construction Noise Levels; **MM-NOI-6:** Avoid or Reduce Construction Noise from | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | Pile Driving; **MM-NOI-7**: Coordinate Construction Activities to Avoid or Minimize Excessive Noise at Occupied Onsite Learning Spaces. | | |
| **Impact-NOI-7:** Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips or Altered Traffic Patterns. | **MM-NOI-13:** Conduct a Traffic Noise Analysis to Quantify the Traffic Effects of Redesigned Project Sites, Including New or Expanded Onsite Facilities; **MM-NOI-14:** Plan Access Routes for Redesigned Project Sites, Including New or Expanded Onsite Facilities to Avoid Substantial Traffic Increases Adjacent to Noise-Sensitive Land Uses. | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |
| **Impact-NOI-8:** Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code During Operation of an Existing District Facility. | **MM-NOI-10**: Apply Administrative Controls and Incorporate Public Address System Design Features to Reduce Operational Noise Levels During All Use (School and Joint Use) of Any New or Redesigned Major Athletic Facilities; **MM-NOI-11:** Design and Install All New or Substantially Altered Mechanical Systems to Ensure All Mechanical Equipment Complies with Section 59.5.0401 of the City of San Diego Municipal Code at Nearby Noise-Sensitive Receptors; **MM-NOI-12:** Design and Develop All Other New, Expanded, or Relocated Exterior Noise Sources so that Operational Noise Does Not Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use Resulting in an Exceedance of Section | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | 59.5.0401 of the City of San Diego Municipal Code. | | |
| **Impact-NOI-13:** Exceed Caltrans Guideline Criteria for Potential Building Damage During Project Construction. | **MM-NOI-16:** Avoid or Reduce Potentially Damaging Vibration at Nearby Buildings from Program Construction. | Less than significant | Construction equipment that could produce potentially damaging vibration will be prohibited within the damage threshold distances. Therefore, damage to buildings from vibration would be avoided. |
| **Impact-NOI-14:** Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Offsite Sensitive Receptors During Project Construction. | **MM-NOI-17:** Avoid or Reduce Potentially Annoying Vibration at Occupied Sensitive Offsite Buildings During Project Construction. | Significant and Unavoidable | It may not be possible to fully implement **MM-NOI-17** and reduce groundborne vibration to less than 0.04 in/sec PPV at all nearby sensitive receptors. |
| **Impact-NOI-15:** Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Occupied Onsite Learning Spaces During Project Construction. | **MM-NOI-18:** Avoid or Reduce Potentially Annoying Vibration at Occupied Onsite Learning Spaces During Program Construction. | Significant and Unavoidable | It may not be possible to fully implement **MM-NOI-18** and reduce groundborne vibration to less than 0.04 in/sec PPV at all onsite learning spaces. |
| **Upgrades of Existing School and Administrative Sites** | | | |
| **Impact-NOI-9:** Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction Activities Associated with Upgrades of Existing School and Administrative Sites. | **MM-NOI-1**: Conduct Site-Specific Reviews of Noise Impacts and, if Warranted, Conduct Additional Analyses; **MM-NOI-2**: Prohibit Exterior Construction Activities Outside of the City of San Diego's Permitted Construction Hours; **MM-NOI-3:** Avoid Construction Within the Calculated Screening Distances of Noise-Sensitive Receptors; **MM-NOI-4**: Implement General Best Practices for Construction Noise Abatement; **MM-NOI-5:** Install Temporary Noise Barriers to Shield Noise- | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | Sensitive Receptors from Excessive Construction Noise Levels; **MM-NOI-6:** Avoid or Reduce Construction Noise from Pile Driving. | | |
| **Impact-NOI-10:** Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to Upgrades of Existing School and Administrative Sites. | **MM-NOI-1**: Conduct Site-Specific Reviews of Noise Impacts and, if Warranted, Conduct Additional Analyses; **MM-NOI-3:** Avoid Construction Within the Calculated Screening Distances of Noise-Sensitive Receptors; **MM-NOI-4**: Implement General Best Practices for Construction Noise Abatement; **MM-NOI-5:** Install Temporary Noise Barriers to Shield Noise-Sensitive Receptors from Excessive Construction Noise Levels; **MM-NOI-6:** Avoid or Reduce Construction Noise from Pile Driving; **MM-NOI-7**: Coordinate Construction Activities to Avoid or Minimize Excessive Noise at Occupied Onsite Learning Spaces. | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |
| **Impact-NOI-7:** Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips or Altered Traffic Patterns. | **MM-NOI-13:** Conduct a Traffic Noise Analysis to Quantify the Traffic Effects of Redesigned Project Sites, Including New or Expanded Onsite Facilities; **MM-NOI-14:** Plan Access Routes for Redesigned Project Sites, Including New or Expanded Onsite Facilities to Avoid Substantial Traffic Increases Adjacent to Noise-Sensitive Land Uses. | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |
| **Impact-NOI-8:** Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive | **MM-NOI-10**: Apply Administrative Controls and Incorporate Public Address System Design | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code During Operation of an Existing District Facility. | Features to Reduce Operational Noise Levels During All Use (School and Joint Use) of Any New or Redesigned Major Athletic Facilities; **MM-NOI-11:** Design and Install All New or Substantially Altered Mechanical Systems to Ensure All Mechanical Equipment Complies with Section 59.5.0401 of the City of San Diego Municipal Code at Nearby Noise-Sensitive Receptors; **MM-NOI-12:** Design and Develop All Other New, Expanded, or Relocated Exterior Noise Sources so that Operational Noise Does Not Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use Resulting in an Exceedance of Section 59.5.0401 of the City of San Diego Municipal Code. | | noise levels may still exceed the limits specified in the City's Municipal Code. |
| **Impact-NOI-13:** Exceed Caltrans Guideline Criteria for Potential Building Damage During Project Construction. | **MM-NOI-16:** Avoid or Reduce Potentially Damaging Vibration at Nearby Buildings from Program Construction. | Less than Significant | Construction equipment that could produce potentially damaging vibration will be prohibited within the damage threshold distances. Therefore, damage to buildings from vibration would be avoided. |
| **Impact-NOI-14:** Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Offsite Sensitive Receptors During Project Construction. | **MM-NOI-17:** Avoid or Reduce Potentially Annoying Vibration at Occupied Sensitive Offsite Buildings During Project Construction. | Significant and Unavoidable | It may not be possible to fully implement **MM-NOI-17** and reduce groundborne vibration to less than 0.04 in/sec PPV at all nearby sensitive receptors. |
| **Impact-NOI-15:** Exceed Caltrans Guideline Criteria for Potential Human | **MM-NOI-18:** Avoid or Reduce Potentially Annoying Vibration at | Significant and Unavoidable | It may not be possible to fully implement **MM-NOI-18** and reduce |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| Annoyance at Occupied Onsite Learning Spaces During Project Construction. | Occupied Onsite Learning Spaces During Program Construction. | | groundborne vibration to less than 0.04 in/sec PPV at all onsite learning spaces. |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| **Impact-NOI-11:** Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of Joint-Use Facilities. | **MM-NOI-1**: Conduct Site-Specific Reviews of Noise Impacts and, if Warranted, Conduct Additional Analyses; **MM-NOI-2**: Prohibit Exterior Construction Activities Outside of the City of San Diego's Permitted Construction Hours; **MM-NOI-3:** Avoid Construction Within the Calculated Screening Distances of Noise-Sensitive Receptors; **MM-NOI-4**: Implement General Best Practices for Construction Noise Abatement; **MM-NOI-5:** Install Temporary Noise Barriers to Shield Noise-Sensitive Receptors from Excessive Construction Noise Levels; **MM-NOI-6:** Avoid or Reduce Construction Noise from Pile Driving. | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |
| **Impact-NOI-12:** Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Associated with Joint-Use Facilities. | **MM-NOI-1**: Conduct Site-Specific Reviews of Noise Impacts and, if Warranted, Conduct Additional Analyses; **MM-NOI-3:** Avoid Construction Within the Calculated Screening Distances of Noise-Sensitive Receptors; **MM-NOI-4**: Implement General Best Practices for Construction Noise Abatement; **MM-NOI-5:** Install Temporary Noise Barriers to Shield Noise-Sensitive Receptors from Excessive Construction Noise Levels; **MM-NOI-6:** | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | Avoid or Reduce Construction Noise from Pile Driving; **MM-NOI-7**: Coordinate Construction Activities to Avoid or Minimize Excessive Noise at Occupied Onsite Learning Spaces. | | |
| **Impact-NOI-7:** Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips or Altered Traffic Patterns. | **MM-NOI-13:** Conduct a Traffic Noise Analysis to Quantify the Traffic Effects of Redesigned Project Sites, Including New or Expanded Onsite Facilities; **MM-NOI-14:** Plan Access Routes for Redesigned Project Sites, Including New or Expanded Onsite Facilities to Avoid Substantial Traffic Increases Adjacent to Noise-Sensitive Land Uses. | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |
| **Impact-NOI-8:** Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code During Operation of an Existing District Facility. | **MM-NOI-10**: Apply Administrative Controls and Incorporate Public Address System Design Features to Reduce Operational Noise Levels During All Use (School and Joint Use) of Any New or Redesigned Major Athletic Facilities; **MM-NOI-11:** Design and Install All New or Substantially Altered Mechanical Systems to Ensure All Mechanical Equipment Complies with Section 59.5.0401 of the City of San Diego Municipal Code at Nearby Noise-Sensitive Receptors; **MM-NOI-12:** Design and Develop All Other New, Expanded, or Relocated Exterior Noise Sources so that Operational Noise Does Not Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | Use Resulting in an Exceedance of Section 59.5.0401 of the City of San Diego Municipal Code. | | |
| **Impact-NOI-13:** Exceed Caltrans Guideline Criteria for Potential Building Damage During Project Construction. | **MM-NOI-16:** Avoid or Reduce Potentially Damaging Vibration at Nearby Buildings from Program Construction. | Less than Significant | Construction equipment that could produce potentially damaging vibration will be prohibited within the damage threshold distances. Therefore, damage to buildings from vibration would be avoided. |
| **Impact-NOI-14:** Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Offsite Sensitive Receptors During Project Construction. | **MM-NOI-17:** Avoid or Reduce Potentially Annoying Vibration at Occupied Sensitive Offsite Buildings During Project Construction. | Significant and Unavoidable | It may not be possible to fully implement **MM-NOI-17** and reduce groundborne vibration to less than 0.04 in/sec PPV at all nearby sensitive receptors. |
| **Impact-NOI-15:** Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Occupied Onsite Learning Spaces During Project Construction. | **MM-NOI-18:** Avoid or Reduce Potentially Annoying Vibration at Occupied Onsite Learning Spaces During Program Construction. | Significant and Unavoidable | It may not be possible to fully implement **MM-NOI-18** and reduce groundborne vibration to less than 0.04 in/sec PPV at all onsite learning spaces. |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| **Impact-NOI-5:** Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of Whole Site Modernization Projects. | **MM-NOI-1**: Conduct Site-Specific Reviews of Noise Impacts and, if Warranted, Conduct Additional Analyses; **MM-NOI-2**: Prohibit Exterior Construction Activities Outside of the City of San Diego's Permitted Construction Hours; **MM-NOI-3:** Avoid Construction Within the Calculated Screening Distances of Noise-Sensitive Receptors; **MM-NOI-4**: Implement General Best Practices for Construction Noise Abatement; **MM-NOI-5:** | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | Install Temporary Noise Barriers to Shield Noise-Sensitive Receptors from Excessive Construction Noise Levels; **MM-NOI-6:** Avoid or Reduce Construction Noise from Pile Driving. | | |
| **Impact-NOI-6:** Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to Whole Site Modernization Projects. | **MM-NOI-1**: Conduct Site-Specific Reviews of Noise Impacts and, if Warranted, Conduct Additional Analyses; **MM-NOI-3:** Avoid Construction Within the Calculated Screening Distances of Noise-Sensitive Receptors; **MM-NOI-4**: Implement General Best Practices for Construction Noise Abatement; **MM-NOI-5:** Install Temporary Noise Barriers to Shield Noise-Sensitive Receptors from Excessive Construction Noise Levels; **MM-NOI-6:** Avoid or Reduce Construction Noise from Pile Driving; **MM-NOI-7**: Coordinate Construction Activities to Avoid or Minimize Excessive Noise at Occupied Onsite Learning Spaces. | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |
| **Impact-NOI-7:** Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips or Altered Traffic Patterns. | **MM-NOI-13:** Conduct a Traffic Noise Analysis to Quantify the Traffic Effects of Redesigned Project Sites, Including New or Expanded Onsite Facilities; **MM-NOI-14:** Plan Access Routes for Redesigned Project Sites, Including New or Expanded Onsite Facilities to Avoid Substantial Traffic Increases Adjacent to Noise-Sensitive Land Uses. | Significant and Unavoidable | Because it may not be possible to fully implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |
| **Impact-NOI-8:** Generate a Noticeable Increase (3 | **MM-NOI-10**: Apply Administrative Controls | Significant and Unavoidable | Because it may not be possible to fully |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code During Operation of an Existing District Facility. | and Incorporate Public Address System Design Features to Reduce Operational Noise Levels During All Use (School and Joint Use) of Any New or Redesigned Major Athletic Facilities; **MM-NOI-11:** Design and Install All New or Substantially Altered Mechanical Systems to Ensure All Mechanical Equipment Complies with Section 59.5.0401 of the City of San Diego Municipal Code at Nearby Noise-Sensitive Receptors; **MM-NOI-12:** Design and Develop All Other New, Expanded, or Relocated Exterior Noise Sources so that Operational Noise Does Not Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use Resulting in an Exceedance of Section 59.5.0401 of the City of San Diego Municipal Code. | | implement all the mitigation measures, noise levels may still exceed the limits specified in the City's Municipal Code. |
| **Impact-NOI-13:** Exceed Caltrans Guideline Criteria for Potential Building Damage During Project Construction. | **MM-NOI-16:** Avoid or Reduce Potentially Damaging Vibration at Nearby Buildings from Program Construction. | Less than Significant | Construction equipment that could produce potentially damaging vibration will be prohibited within the damage threshold distances. Therefore, damage to buildings from vibration would be avoided. |
| **Impact-NOI-14:** Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Offsite Sensitive Receptors During Project Construction. | **MM-NOI-17:** Avoid or Reduce Potentially Annoying Vibration at Occupied Sensitive Offsite Buildings During Project Construction. | Significant and Unavoidable | It may not be possible to fully implement **MM-NOI-17** and reduce groundborne vibration to less than 0.04 in/sec PPV at all nearby sensitive receptors. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-NOI-15:** Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Occupied Onsite Learning Spaces During Project Construction. | **MM-NOI-18:** Avoid or Reduce Potentially Annoying Vibration at Occupied Onsite Learning Spaces During Program Construction. | Significant and Unavoidable | It may not be possible to fully implement **MM-NOI-18** and reduce groundborne vibration to less than 0.04 in/sec PPV at all onsite learning spaces. |

# 4.10.2 Fundamentals of Environmental Noise

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is often defined as sound that is objectionable because it is unwanted, disturbing, or annoying.

In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receptor, and the propagation path between the two. The loudness of the noise source and the obstructions or atmospheric factors, which affect the propagation path to the receptor, determine the sound level and the characteristics of the noise perceived by the receptor.

The following sections provide an explanation of key concepts and acoustical terms used in the analysis of environmental and community noise.

## 4.10.2.1 Frequency, Amplitude, and Decibels

Continuous sound can be described by its *frequency* (pitch) and *amplitude* (loudness). A low-frequency sound is perceived as low in pitch; a high-frequency sound is perceived as high-pitched. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz (kHz), or thousands of Hz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

The amplitude of pressure waves generated by a sound source determines the loudness of that source. The amplitude of a sound is typically described in terms of the *sound pressure level*, which refers to the root-mean-square (RMS)[1] pressure of a sound wave, and measured in units called microPascals (µPa). One µPa is approximately one hundred-billionth (0.00000000001) of normal atmospheric pressure. Sound pressure levels for different kinds of noise environments can range from less than 100 to more than 100,000,000 µPa. Because of this large range of values, sound is rarely expressed in terms of µPa. Instead, a logarithmic scale is used to describe the sound pressure level (also referred to as simply the sound level) in terms of decibels, abbreviated dB. Specifically, the decibel describes the ratio of the actual sound pressure to a reference pressure and is calculated as follows:

[1] Root-mean-square (RMS) is defined as the square root of the mean (average) value of the squared amplitude of the noise signal.

$$SPL = 20 \times \log_{10}\left(\frac{X}{20\mu Pa}\right)$$

where *X* is the actual sound pressure and 20 µPa is the standard reference pressure level for acoustical measurements in air. The threshold of hearing for young people is about 0 dB, which corresponds to 20 µPa.

### Decibel Calculations

Because decibels represent noise levels using a logarithmic scale, sound pressure levels cannot be added, subtracted, or averaged through ordinary arithmetic. On the dB scale, a doubling of sound energy corresponds to a 3-dB increase. In other words, when two identical sources are each producing sound of the same loudness, their combined sound level at a given distance would be 3 dB higher than one source under the same conditions. The cumulative sound level of any number of sources can be determined using decibel addition. The same decibel addition is used for A-weighted decibels described below.

Similarly, the arithmetic mean (average) of a series of noise levels does not accurately represent the overall average noise level. Instead, the values must be averaged using a linear scale before converting the result back into a logarithmic (dB) noise level. This method is typically referred to as calculating the "energy average" of the noise levels.

## 4.10.2.2 Perception of Noise and A-Weighting

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Although the intensity (energy per unit area) of the sound is a purely physical quantity, the loudness or human response is determined by characteristics of the human ear.

Human hearing is limited in the range of audible frequencies as well as in the way it perceives the sound pressure level in that range. In general, people are most sensitive to the frequency range of 1,000 to 8,000 Hz and perceive sounds within that range better than sounds of the same amplitude in higher or lower frequencies. To approximate the response of the human ear, sound levels in various frequency bands are adjusted (or "weighted"), depending on the human sensitivity to those frequencies. The resulting sound pressure level is expressed in A-weighted decibels, abbreviated dBA.

The A-weighting scale approximates the frequency response of the average young ear when listening to most ordinary sounds. When people make judgments regarding the relative loudness or annoyance of a sound, their judgments correlate well with the A-weighted sound levels of those sounds. Table 4.10-2 describes typical A-weighted sound levels for various noise sources.

**Table 4.10-2. Typical Noise Levels in the Environment**

| Common Outdoor Noise Source | Sound Level (dBA) | Common Indoor Noise Source |
|---|---|---|
| | — 110 — | Rock band |
| Jet flying at 1,000 feet | | |
| | — 100 — | |
| Gas lawn mower at 3 feet | | |
| | — 90 — | |
| Diesel truck at 50 feet at 50 mph | | Food blender at 3 feet |
| | — 80 — | Garbage disposal at 3 feet |
| Noisy urban area, daytime | | |
| Gas lawn mower at 100 feet | — 70 — | Vacuum cleaner at 10 feet |
| Commercial area | | Normal speech at 3 feet |
| Heavy traffic at 300 feet | — 60 — | |
| | | Large business office |
| Quiet urban daytime | — 50 — | Dishwasher in next room |
| | | |
| Quiet urban nighttime | — 40 — | Theater, large conference room (background) |
| Quiet suburban nighttime | | |
| | — 30 — | Library |
| Quiet rural nighttime | | Bedroom at night |
| | — 20 — | |
| | | Broadcast/recording studio |
| | — 10 — | |
| Lowest threshold of human hearing | — 0 — | Lowest threshold of human hearing |

Source: California Department of Transportation 2013a.

## 4.10.2.3 Noise Descriptors

Because sound levels can vary markedly over a short period of time, various descriptors or noise "metrics" have been developed to quantify environmental and community noise. These metrics generally describe either the average character of the noise or the statistical behavior of the variations in the noise level. Some of the most common metrics used to describe environmental noise, including those metrics used in this report, are described below.

**Equivalent Sound Level ($L_{eq}$)** is the most common metric used to describe short-term average noise levels. Many noise sources produce levels that fluctuate over time; examples include mechanical equipment that cycles on and off or construction work, which can vary sporadically. The $L_{eq}$ describes the average acoustical energy content of noise for an identified period of time, commonly 1 hour. Therefore, the $L_{eq}$ of a time-varying noise and that of a steady noise are the same if they deliver the same acoustical energy over the duration of the exposure. For many noise sources, the $L_{eq}$ will vary, depending on the time of day. A prime example is traffic noise, which rises and falls, depending on the amount of traffic on a given street or freeway.

**Maximum Sound Level ($L_{max}$) and Minimum Sound Level ($L_{min}$)** refer to the maximum and minimum sound levels, respectively, that occur during the noise measurement period. More specifically, they describe the root-mean-square sound levels that correspond to the loudest and quietest 1-second intervals that occur during the measurement.

**Percentile-Exceeded Sound Level ($L_{xx}$)** describes the sound level exceeded for a given percentage of a specified period. For example, the $L_{50}$ is the sound level exceeded 50% of the time (such as 30 minutes per hour), and $L_{25}$ is the sound level exceeded 25% of the time (such as 15 minutes per hour). Many municipalities use $L_{xx}$ metrics in their noise ordinances to define permissible noise limits, allowing different noise levels depending on the duration of the noise within an hour.

**Community Noise Equivalent Level (CNEL)** is a measure of the 24-hour average A-weighted noise level that is also time-weighted to "penalize" noise that occurs during the evening and nighttime hours when noise is generally recognized to be more disturbing (because people are trying to rest, relax, and sleep during these times). 5 dBA is added to the $L_{eq}$ during the evening hours of 7 p.m. to 10 p.m.,[2] and 10 dBA is added to the $L_{eq}$ during the nighttime hours of 10 p.m. to 7 a.m.[3] and the energy average is then taken for the whole 24-hour day.

**Day-Night Sound Level ($L_{dn}$)** is very similar to the CNEL described above. $L_{dn}$ is also a time-weighted average of the 24-hour A-weighted noise level. The only difference is that no "penalty" is applied to the evening hours of 7 p.m. to 10 p.m. 10 dBA is added to the $L_{eq}$ during the nighttime hours of 10 p.m. to 7 a.m. and the energy average is then taken for the whole 24-hour day

It is noted that various federal, state, and local agencies have adopted CNEL or $L_{dn}$ as the measure of community noise. While not identical, CNEL and $L_{dn}$ are normally within 1 dBA of each other when measured in typical community environments, and many noise standards/regulations use the two interchangeably.

## 4.10.2.4 Sound Propagation

When sound propagates over a distance, it changes in both level and frequency content. The manner in which noise is reduced with distance depends on the following important factors.

**Geometric Spreading**. Sound from a single source (i.e., a "point" source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of distance. Highway noise is not a single stationary point source of sound. The movement of vehicles on a highway makes the source of the sound appear to emanate from a line (i.e., a "line" source) rather than from a point. This results in cylindrical spreading rather than the spherical spreading resulting from a point source. The change in sound level (i.e., attenuation or decrease) from a line source is 3 dBA per doubling of distance.

**Ground Absorption**. Usually the noise path between the source and the observer is very close to the ground. The excess noise attenuation from ground absorption occurs due to acoustic energy losses on sound wave reflection. For acoustically "hard" sites (i.e., sites with a reflective

[2] A 5 dB noise increase is generally considered to be a readily perceptible change in the noise level for a listener.

[3] A 10 dB noise increase is generally perceived as a doubling of the noise level for a listener.

surface, such as a parking lot or a smooth body of water, between the source and the receptor), no excess ground attenuation is assumed because the sound wave is reflected without energy losses. For acoustically absorptive or "soft" sites (i.e., sites with an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dBA per doubling of distance is normally assumed. When added to the geometric spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dBA per doubling of distance for a line source and 7.5 dBA per doubling of distance for a point source.

**Atmospheric Effects**. Research by the California Department of Transportation (Caltrans 2013a) and others has shown that atmospheric conditions can have a major effect on noise levels. Factors include wind, air temperature (including vertical temperature gradients), humidity, and turbulence. Receptors downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas receptors upwind can have lower noise levels. Increased sound levels can also occur over relatively large distances because of temperature inversion conditions (i.e., increasing temperature with elevation).

**Shielding by Natural or Human-Made Features**. A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receptor, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (such as hills and dense woods) and human-made features (such as buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receptor with the specific purpose of reducing noise. In addition to the noise that diffracts over the top of a barrier, noise will also diffract around the ends of the barrier leading to "flanking" noise that can reduce the overall efficacy of the barrier. Assuming it is long enough to minimize the effects of flanking noise, a barrier that breaks the line of sight between a source and a receptor will typically result in at least 5 dB of noise reduction. A higher barrier may provide as much as 20 dB of noise reduction.

## 4.10.2.5 Human Response to Noise

Noise-sensitive receptors (also called "receivers") are locations where people reside or where the presence of unwanted sound may adversely affect the use of the land (see Section 4.10.2.6, *Noise-Sensitive Land Uses*). Noise can have a range of effects on people including hearing damage, sleep interference, speech interference, performance interference, physiological responses, and annoyance. Each of these is briefly described below:

**Hearing Damage**. A person exposed to high noise levels can suffer either gradual or traumatic hearing damage. Gradual hearing loss occurs with repeated exposure to excessive noise levels and is most commonly associated with occupational noise exposures in heavy industry or other very noisy work environments. Traumatic hearing loss is caused by sudden exposure to an extremely high noise level, such as a gunshot or explosion at very close range. The potential for noise-induced hearing loss is not generally a concern in typical community noise environments. Noise levels in neighborhoods, even in very noisy airport environs, are not sufficiently loud as to cause hearing loss.

**Sleep Interference**. Exposure to excessive noise levels at night has been shown to cause sleep disturbance. Sleep disturbance refers not only to awakening from sleep, but also to effects on the quality of sleep such as altering the pattern and stages of sleep. World Health Organization

(WHO) guidelines recommend noise limits of 30 dBA $L_{eq}$ (8-hour average) for continuous noise and 45 dBA $L_{max}$ for single sound events inside bedrooms at night to minimize sleep disturbance (WHO 1999).

**Speech Interference**. Speech interference can be a problem in any situation where clear communication is desired, but is often of particular concern in learning environments (such as schools) or situations where poor communication could jeopardize safety. Normal conversational speech inside homes is typically in the range of 50 to 65 dBA (EPA 1977) and any noise in this range or louder may interfere with speech. As background noise levels rise, the intelligibility of speech decreases and the listener will fail to recognize an increasing percentage of the words spoken. A speaker may raise his or her voice in an attempt to compensate for higher background noise levels, but this in turn can lead to vocal fatigue for the speaker.

**Performance Interference**. Excessive noise has been found to have various detrimental effects on human performance, including information processing, concentration, accuracy, reaction times, and academic performance. Intrusive noise from individual events can also cause distraction. These effects are of obvious concern for learning and work environments.

**Physiological Responses**. Acute noise has been shown to cause measurable physiological responses in humans, including changes in stress hormone levels, pulse rate, and blood pressure. The extent is to which these responses cause harm or are signs of harm is not clearly defined, but it has been postulated that they could contribute to stress-related diseases, such as hypertension, anxiety, and heart disease. However, research indicates links between environmental noise and permanent health effects are generally weak and inconsistent. Statistically significant health risks have been found for extended exposure to very high noise level, such as for workers exposed to high levels of industrial noise for 5 to 30 years (WHO 1999).

**Annoyance**. The subjective effects of annoyance, nuisance, and dissatisfaction are possibly the most difficult to quantify and no completely satisfactory method exists to measure these effects. This difficulty arises primarily from differences in individual sensitivity and habituation to sound, which can vary widely from person to person. What one person considers tolerable can be quite unbearable to another of equal hearing acuity. An important tool in estimating the likelihood of annoyance due to a new sound is by comparing it to the existing baseline or "ambient" environment to which that person has adapted. In general, the more the level or tonal (frequency) variations of a sound exceed the previously existing ambient sound level or tonal quality, the less acceptable the new sound will be, as judged by the exposed individual.

In most cases, effects from sounds typically found in the natural environment would be limited to annoyance or interference. Physiological effects and hearing loss would be more commonly associated with human-made noise, such as in an industrial or an occupational setting.

Studies have shown that under controlled conditions in an acoustics laboratory, a healthy human ear is able to discern changes in sound levels of 1 dBA. In the normal environment, the healthy human ear can detect changes of about 2 dBA; however, it is widely accepted that a doubling of sound energy, which results in a change of 3 dBA in the normal environment, is considered just noticeable to most people. A change of 5 dBA is readily perceptible, and a change of 10 dBA is perceived as being twice as loud. Accordingly, a doubling of sound energy (e.g., doubling the volume of traffic on a highway) resulting in a 3 dBA increase in sound would generally be barely detectable.

### 4.10.2.6 Noise-Sensitive Land Uses

Noise-sensitive land uses typically include, but are not necessarily limited to, residential uses, hospitals, nursing facilities, intermediate care facilities, child educational facilities, libraries, museums, and child care facilities (City of San Diego 2015). Schools, museums, and other institutional uses are considered to be noise sensitive only during their standard hours of operation. Parks, which are closed during nighttime hours, are considered to be noise sensitive only during their typical operational hours, which vary depending on the park, but are generally between the hours of 6 a.m. and 10 p.m.

## 4.10.3 Fundamentals of Environmental Vibration

Ground-borne vibration is a small, rapidly fluctuating motion transmitted through the ground. The effects of ground-borne vibrations are typically limited to nuisance or annoyance for people; however, at extreme vibration levels, damage to buildings may also occur.

In contrast to airborne sound, ground-borne vibration is not a phenomenon that most people experience every day. The ambient ground-borne vibration level in residential areas is usually much lower than the threshold of human perception (FTA 2018). Most perceptible indoor vibration is caused by sources within buildings, such as mechanical equipment while in operation, people moving, or doors slamming. Typical outdoor sources of perceptible ground-borne vibration are heavy construction activity (such as blasting, pile driving, or earthmoving), steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is rarely perceptible, even in locations close to major roads. The strength of ground-borne vibration from typical environmental sources diminishes (or attenuates) fairly rapidly over distance.

For the prediction of ground-borne vibration, the fundamental model consists of a vibration source, a receptor, and the propagation path between the two. The power of the vibration source and the characteristics and geology of the intervening ground, which affect the propagation path to the receptor, determine the ground-borne vibration level and the characteristics of the vibration perceived by the receptor.

The following sections provide an explanation of key concepts and terms used in the analysis of environmental groundborne vibration.

### 4.10.3.1 Frequency and Amplitude

The *frequency* of a vibrating object describes how rapidly it is oscillating. The unit of measurement for the frequency of vibration is Hz (the same as used in the measurement of noise), which describes the number of cycles per second.

The *amplitude* of displacement describes the distance that a particle moves from its resting (or equilibrium) position as it oscillates and can be measured in inches. The amplitude of vibration velocity (the speed of the movement) can be measured in inches per second (in/s). The amplitude of vibration acceleration (the rate of change of the speed) can be measured in inches per second.

## 4.10.3.2 Vibration Descriptors

As noted above, there are various ways to quantify groundborne vibration based on its fundamental characteristics. Because vibration can vary markedly over a short period of time, various descriptors have been developed to quantify vibration. The two most common descriptors used in the analysis of groundborne vibration are vibration velocity level and peak particle velocity, each of which are described below:

**Peak Particle Velocity (PPV)** is defined as the maximum instantaneous positive or negative peak amplitude of the vibration velocity. The unit of measurement for PPV is inches per second (in/s). Unlike many quantities used in the study of environmental acoustics, PPV is typically presented using linear values and does not employ a dB scale. Because it is related to the stresses that are experienced by buildings, PPV is generally accepted as the most appropriate descriptor for evaluating the potential for building damage (both the Federal Transit Administration (FTA) and Caltrans guidelines recommend using PPV for this purpose). It is also used in many instances to evaluate the human response to groundborne vibration (Caltrans guidelines recommend using PPV for this purpose).

**Vibration Velocity Level ($L_V$)** describes the root-mean-square vibration velocity. Due to the typically small amplitudes of groundborne vibrations, vibration velocity is often expressed in decibels, calculated as follows.

$$L_V = 20 \times \log_{10}\left(\frac{V}{V_{ref}}\right)$$

where $V$ is the actual RMS velocity amplitude and $V_{ref}$ is the reference velocity amplitude. It is important to note that there is no universally accepted value for $V_{ref}$, but the accepted reference quantity for vibration velocity in the United States is 1 micro-inch per second ($1\times10^{-6}$ in/s). The abbreviation VdB is commonly used for vibration decibels to distinguish from noise level decibels. $L_V$ is often used to evaluate human response to vibration levels (FTA guidelines recommend using $L_V$ for this purpose).

## 4.10.3.3 Vibration Propagation

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations reduce much more rapidly than low frequencies so that low frequencies tend to dominate the spectrum at large distances from the source. The propagation of groundborne vibration is not as simple to model as airborne noise. This is due to the fact that noise in the air travels through a relatively uniform medium, while groundborne vibrations travel through the earth which may contain significant geological differences. Geological factors that influence the propagation of groundborne vibration include the following:

**Soil Conditions**. The type of soil is known to have a strong influence on the levels of groundborne vibration. Among the most important factors are the stiffness and internal damping of the soil. Hard, dense, and compacted soil, stiff clay soil, and hard rock transmit vibration more efficiently than loose, soft soils, sand, or gravel.

**Depth to Bedrock**. Shallow depth to bedrock has been linked to efficient propagation of groundborne vibration. One possibility is that shallow bedrock acts to concentrate the vibration energy near the surface, reflecting vibration waves back toward the surface that would otherwise continue to propagate farther down into the earth.

**Soil Strata**. Discontinuities in the soil strata (i.e., soil layering) can also cause diffractions or channeling effects that affect the propagation of vibration over long distances.

**Frost Conditions**. Vibration waves typically propagate more efficiently in frozen soils than in unfrozen soils. Propagation also varies depending on the depth of the frost.

**Water Conditions**. The amount of water in the soil can affect vibration propagation. The depth of the water table in the path of the propagation also appears to have substantial effects on groundborne vibration levels.

Specific conditions at the source and receiver locations can also affect the vibration levels. For instance, how the source is connected to the ground (e.g., direct contact, through rails, or via a structure) will affect the amount of energy transmitted into the ground. There are also notable differences when the source is underground (such as in a tunnel) versus on the surface. At the receiver, vibration levels can be affected by variables such as the foundation type, the building construction, and the acoustical absorption inside the rooms where people are located. When vibration encounters a building, a ground-to-foundation coupling loss will usually reduce the overall vibration level. However, under certain circumstances, the ground-to-foundation coupling may also amplify the vibration level due to structural resonances of the floors and walls.

## 4.10.3.4 Effects of Groundborne Vibration

Vibration can result in effects that range from annoyance to structural damage. Annoyance or disturbance of people may occur at vibration levels substantially below those that would pose a risk of damage to buildings. Each of these effects is discussed below.

### Potential Building Damage

When groundborne vibration encounters a building, vibrational energy is transmitted to the structure causing it to vibrate, and, if the vibration levels are high enough, damage to the building may occur. Depending on the type of building and the vibration levels, this damage could range from cosmetic architectural damage (e.g., cracked plaster, stucco, or tile) to more severe structural damage (e.g., cracking of floor slabs, foundations, columns, beams, or wells). Buildings can typically withstand higher levels of vibration from transient sources than from continuous or frequent intermittent sources. Transient sources are those that create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment. Older, fragile buildings (which may include important historical buildings) are of particular concern. Modern commercial and industrial buildings can generally withstand much higher vibration levels before potential damage becomes a problem.

### Human Disturbance or Annoyance

Groundborne vibration can be annoying to people and can cause serious concern for nearby neighbors of vibration sources, even when vibration is well below levels that could cause physical

damage to structures. Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernible, but there is less adverse reaction without the effects associated with the shaking of a building. The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than 1 Hz to a high of about 200 Hz.

When groundborne vibration waves encounter a building, vibrational energy is transmitted to the structure, causing building surfaces (walls, floors, and ceilings) to vibrate. This movement may be felt directly by building occupants and may also generate a low-frequency rumbling noise as sound waves are radiated by the vibrating surfaces. At higher frequencies, building vibration can cause other audible effects such as rattling of windows, building fixtures, or items on shelves or hanging on walls. These audible effects due to groundborne vibration are referred to as groundborne noise. Groundborne vibration levels that result in groundborne noise are often experienced as a combination of perceptible vibration and low-frequency noise. However, sources that have the potential to generate groundborne noise are likely to produce airborne noise impacts that mask the radiated groundborne noise. Any perceptible effect (vibration or groundborne noise) can lead to annoyance. The degree to which a person is annoyed depends on the activity in which they are participating at the time of the disturbance. For example, someone sleeping or reading will be more sensitive than someone who is engaged in any type of physical activity. Reoccurring vibration effects often lead people to believe that the vibration is damaging their home, although vibration levels are well below minimum thresholds for damage potential (Caltrans 2013b).

### 4.10.3.5 Vibration-Sensitive Land Uses

Because building damage would be considered a permanent negative effect at any building, regardless of land use, any type of building would typically be considered sensitive to vibration damage impacts.

Land uses that would be considered sensitive to human annoyance caused by vibration are generally the same as those that would be sensitive to noise and would typically include residential uses, hospitals, nursing facilities, intermediate care facilities, child educational facilities, libraries, museums, and child care facilities. It is noted, however, that vibration effects are typically only considered inside occupied buildings and not at outside areas such as residential yards, parks, or open space. Schools, museums, and other institutional uses are considered to be sensitive to human annoyance effects from vibration only during their standard hours of operation.

Because of the sensitive nature of classroom activities and the potential for substantial vibration to disturb child learning, onsite classrooms are also considered sensitive when occupied by students for any academic purposes.

## 4.10.4 Existing Conditions

The District includes properties (educational facilities, administrative sites, and vacant parcels) spread throughout the City of San Diego (City).[4] As a result, the Program area is very large with

[4] As discussed further in Chapter 2, *Environmental Setting*, the District's jurisdiction also includes small portions of the cities of La Mesa and Lemon Grove, as well as unincorporated San Diego County. However, all existing District facilities are within the boundaries of the City of San Diego.

existing ambient noise levels that vary widely. The loudest environments are found in proximity to major noise sources such as freeways, major arterial roadways, railroads, and airports (military and civilian). Elevated noise levels are also found close to major industrial or commercial centers, both as a direct result of operational noise and due to increased traffic volumes (often including increased volumes of medium and heavy trucks on surrounding streets). Lower ambient noise levels are experienced around facilities located primarily in residential and suburban neighborhoods.

# 4.10.5 Applicable Laws and Regulations

## 4.10.5.1 Federal

No federal noise regulations directly apply to the Proposed Program. Certain federal programs influence the audible landscape, particularly with respect to noise from transportation sources. For instance, the Federal Highway Administration (FHWA) provides criteria for noise from highway traffic, and the FTA provides criteria for noise from transit projects (passenger rail, bus, etc.). Because the Proposed Program is not a transportation project, the criteria would not apply.

## 4.10.5.2 State

### Governor's Office of Planning and Research

The State of California Governor's Office of Planning and Research has published recommended guidelines for the preparation and content of a noise element of a general plan. Each jurisdiction is required to consider these guidelines when developing the general plan noise element and determining acceptable noise levels within the community. Based on the guidelines, the City has developed noise standards as part of its general plan and municipal code (see Section 4.10.5.3, *Local*).

### California Department of Transportation

Caltrans provides widely referenced vibration guidelines in its publication *Transportation and Construction Vibration Guidance Manual* (Caltrans 2013b). Although these guidelines do not represent strict standards that apply to the Proposed Program, they are useful in establishing appropriate thresholds of impact, particularly because the City does not provide any quantitative standards for groundborne vibration levels. The manual defines two different types of potential vibration impact: (1) building damage potential and (2) annoyance potential, as summarized in Tables 4.10-3 and 4.10-4. Groundborne vibration annoyance criteria are typically only assessed at building locations rather than exterior areas such as yards, parks, or playgrounds because people are typically much less sensitive to groundborne vibration when they are using exterior areas than when they are inside buildings.

**Table 4.10-3. Caltrans Vibration Damage Potential Threshold Criteria**

| | Maximum PPV (inches/second)[1] | |
|---|---|---|
| **Structure and Condition** | **Transient Sources** | **Continuous/Frequent Intermittent Sources** |
| Extremely fragile historic buildings, ruins, ancient monuments | 0.12 | 0.08 |
| Fragile buildings | 0.2 | 0.1 |
| Historic and some old buildings | 0.5 | 0.25 |
| Older residential structures | 0.5 | 0.3 |
| New residential structures | 1.0 | 0.5 |
| Modern industrial/commercial buildings | 2.0 | 0.5 |

[1] Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

**Table 4.10-4. Caltrans Vibration Annoyance Potential Criteria**

| | Maximum PPV (inches/second)[1] | |
|---|---|---|
| **Human Response** | **Transient Sources** | **Continuous/Frequent Intermittent Sources** |
| Barely perceptible | 0.04 | 0.01 |
| Distinctly perceptible | 0.25 | 0.04 |
| Strongly perceptible | 0.90 | 0.10 |
| Severe | 2.00 | 0.40 |

[1] Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

# 4.10.5.3 Local

While California Government Code Section 53094 includes provisions for school districts to exempt specific school projects from local zoning regulations, applicable objectives and policies of the City's Significance Determination Thresholds related to noise and vibration are identified for comparison. Additionally, although the District's jurisdiction also includes small portions of the cities of La Mesa and Lemon Grove, as well as unincorporated San Diego County, all existing District facilities are within the boundaries of the City of San Diego. Therefore, only City of San Diego regulations and standards are described below.

## City of San Diego Municipal Code

Construction noise within the City of San Diego is governed by the City's Municipal Code Section 59.5.0404, the relevant parts of which are cited below.

> (a) It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator…

> (b) … it shall be unlawful for any person, including The City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12–hour period from 7:00 a.m. to 7:00 p.m.

Operational noise within the City of San Diego is governed by the City's Municipal Code Section 59.5.0401, which established the allowable noise limits at the property boundaries for different land use zones. The relevant parts are cited below.

> (a) It shall be unlawful for any person to cause noise by any means to the extent that the one–hour average sound level exceeds the applicable limit given in the following table, at any location in the City of San Diego on or beyond the boundaries of the property on which the noise is produced. The noise subject to these limits is that part of the total noise at the specified location that is due solely to the action of said person.
>
> (b) The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts.

The noise limits for the various land use zones are summarized in Table 4.10-5. The applicable requirement is a function of the time of day and land use zone.

**Table 4.10-5. City of San Diego Property Line Noise Limits**

| Receiving Land Use | Daytime 7 a.m. to 7 p.m. | Evening 7 p.m. to 10 p.m. | Nighttime 10 p.m. to 7 a.m. |
|---|---|---|---|
| Single-Family Residential | 50 dBA $L_{eq}$ | 45 dBA $L_{eq}$ | 40 dBA $L_{eq}$ |
| Multi-Family Residential | 55 dBA $L_{eq}$ | 50 dBA $L_{eq}$ | 45 dBA $L_{eq}$ |
| All Other Residential | 60 dBA $L_{eq}$ | 55 dBA $L_{eq}$ | 50 dBA $L_{eq}$ |
| Commercial | 65 dBA $L_{eq}$ | 60 dBA $L_{eq}$ | 60 dBA $L_{eq}$ |
| Industrial or Agricultural | 75 dBA $L_{eq}$ | 75 dBA $L_{eq}$ | 75 dBA $L_{eq}$ |

## City of San Diego General Plan

The City of San Diego General Plan, Noise Element (City of San Diego 2015), provides information, goals, and policies related to the noise environment within the City. General Plan Table NE-3 presents Land Use – Noise Compatibility Guidelines detailing the compatibility of various land uses with different noise exposures, defined using the CNEL. There are three different tiers of compatibility: (1) Compatible, (2) Conditionally Compatibility, and (3) Incompatible.

The guidelines of the Noise Element are not used directly for the assessment of impacts in this PEIR because more explicit thresholds are provided by the City's CEQA Significance Determination Thresholds (City of San Diego 2016), which are discussed below.

## City of San Diego Significance Determination Thresholds

The City's CEQA Significance Determination Thresholds guide the assessment of impacts, relative to CEQA, for projects within the City. For noise impacts, many of the thresholds defer to the City's Municipal Code standards, as discussed above. However, the guidelines also provide some additional clarification regarding thresholds of impact for traffic noise that is helpful in the analysis of potential impacts at the noise-sensitive receptors considered in this PEIR. The City's traffic noise significance thresholds are reproduced below as Table 4.10-6.

**Table 4.10-6. San Diego CEQA Significance Determination Thresholds, Traffic Noise**

| Structure or Proposed Use that Would Be Impacted by Traffic Noise | Interior Space (CNEL) | Exterior Usable Space[1] (CNEL) | General Indication of Potential Significance |
|---|---|---|---|
| Single-Family Detached | 45 dB | 65 dB | Structure or outdoor usable area[2] is <50 feet from the center of the closest (outside) lane on a street with existing or future Average Daily Traffic (ADT) >7,500 |
| Multi-Family, Schools, Libraries, Hospitals, Day Care, Hotels, Motels, Parks, Convalescent Homes | Development Services Department ensures 45 dB pursuant to Title 24 | 65 dB | |
| Offices, Churches, Business, Professional Uses | N/A | 70 dB | Structure or outdoor usable area is <50 feet from the center of the closest lane on a street with existing or future ADT of >20,000 |
| Commercial, Retail, Industrial, Outdoor Spectator Sports Uses | N/A | 75 dB | Structure or outdoor usable area is <50 feet from the center of the closest lane on a street with existing or future ADT of >40,000 |

Source: City of San Diego 2016, Table K-2.

[1] If a project is currently at or exceeds the significance thresholds for traffic noise described above, and noise levels would result in less than a 3 dB increase, then the impact is not considered significant.

[2] Exterior usable areas do not include residential front yards or balconies, unless the areas such as balconies are part of the required usable open space calculation for multi-family units.

# 4.10.6 Impact Analysis

## 4.10.6.1 Onsite Versus Offsite Impacts

CEQA does not require an analysis of how the existing environmental conditions will affect a project's residents or users unless the project would exacerbate those conditions. Examples of regulations and guidelines that may apply to elements of the Proposed Program outside of CEQA may include, but are not limited to, the following.

- **California Code of Regulations (CCR) Title 5.** This regulation includes various standards for new school and site modernization projects, including the consideration of noise as an environmental factor and "good sound control in school buildings." Title 5 applies to all school projects seeking state funding. The California Department of Education also recommends that school projects that are not state funded should still be consistent with Title 5.

- **California Code of Regulations Title 24 (California Building Standards Code), Part 11 (California Green Building Standards Code).** This code is also referred to as *CALGreen*, and provides various mandatory and voluntary measures for "green" development, including several related to noise.

- **Collaborative for High Performance Schools (CHPS) Criteria**. These criteria address reverberation time, background noise from building services and utilities, and background noise

from exterior sources. The criteria consider both "Core Learning Spaces" and "Ancillary Learning Spaces." The criteria are voluntary unless mandated by a regulating agency (typically a school district).

- **American National Standards Institute (ANSI) Guidelines**. ANSI Standard S12.60 for Classroom Acoustics is a voluntary standard (unless referenced by a code, ordinance or regulation) that addresses the issues of both reverberation time and background noise in classrooms.

# 4.10.6.2 Methodology

The Proposed Program includes new school or administrative facility construction as well as various repair, renovation, and revitalization improvements that would result in construction and operational changes relative to the existing setting. These types of projects are grouped into four categories that represent typical capital improvement projects that could be implemented at any of the District's schools and administrative sites, as well as new, currently unidentified sites. Noise and vibration impacts associated with construction and operation of these types of projects were assessed and quantified (where applicable) using standard and accepted analysis techniques. A summary of the methodology is provided below.

## General Assumptions for Noise Calculations

As described previously, three of the most important variables affecting the noise level experienced at a noise-sensitive receptor are (1) the distance between the noise source and the receptor, (2) the ground conditions between the two, and (3) the acoustical shielding between the two. These are summarized below.

### Source-to-Receiver Distances

Depending on the source in question and the noise metric to be assessed, one of two definitions can be used to describe the source-to-receiver distance, as summarized below.

**Closest Distance**. The closest source-to-receptor distance is very straightforward and describes the shortest distance between the noise sensitive receptor and the closest part of the noise source, such as an individual piece of equipment or the closest edge of an active construction site.

**Acoustical Average Distance**. The acoustical average distance is used to represent noise sources that are mobile or distributed over an area (such as a construction site, sports field, or parking lot); it is calculated by multiplying the shortest distance between the receiver and the noise source area by the farthest distance and then taking the square root of the product:

$$\text{Acoustical average distance} = \sqrt{Distance_A \times Distance_B}$$

where $Distance_A$ is the shortest distance between the receiver and the noise source area (i.e., the active construction site) and $Distance_B$ is the longest distance between the receiver and the noise source area.

For a small stationary noise source, such as an individual piece of mechanical equipment, there is usually negligible difference between the closest distance and the acoustical average distance. However, the acoustical average distance is generally a more accurate description for larger

distributed noise sources; in such cases, the acoustical average distance is always larger than the closest distance.

### Ground Conditions

Noise levels were conservatively assumed to decrease at a rate of 6 dB per doubling of distance, which is the standard assumption for acoustically hard (i.e., reflective) ground surfaces such as asphalt, concrete, water, and packed dirt. In reality, the attenuation rate would often be higher due to the presence of acoustically soft ground conditions (i.e., unpaved areas with ground cover such as packed dirt, soft dirt, turf, grass, or other vegetation).

### Acoustical Shielding

Another conservative assumption in the modeling was to neglect barrier effects (acoustical shielding) that might be provided by walls, fences, buildings, topography and other solid barriers.

## Construction Noise

Construction-related noise was analyzed using data and modeling methodologies from the FHWA's Roadway Construction Noise Model Version 1.1 (FHWA 2008), which predicts noise levels at nearby receptors by analyzing the type of equipment, the distance from source to receptor, usage factor, and the presence or absence of intervening shielding between source and receptor. Although the proposed Program is not specifically a roadway construction project, the model is broad enough to be applicable, providing noise data for all of the equipment types typically required during conventional construction.

In order to facilitate a quantitative construction noise analysis, it was necessary to make assumptions about the type of construction activity that might reasonably occur under each project category. Because construction noise is assessed against the City's 12-hour $L_{eq}$ noise limit, the combined construction equipment operating on a given day is important. Estimated construction equipment lists were generated by CalEEMod as part of the screening analysis described in Section 4.2, *Air Quality and Health Risk*, of this PEIR. These equipment lists were also used in the construction noise analysis. A single set of CalEEMod default assumptions were used for three of the project categories: New Acquisition and New School or Administrative Facilities, Whole Site Modernization, and Upgrades of Existing School and Administrative Sites. These default assumptions provided equipment lists for six anticipated construction phases: (1) demolition, (2) site preparation, (3) grading, (4) building construction, (5) paving, and (6) architectural coating. Because CalEEMod does not distinguish the use of certain impact tools that are of particular importance for potential noise impacts, two additional scenarios were added to the noise analysis of these project categories. One new scenario added a mounted impact hammer to the list of demolition equipment.[5] The second new scenario considered the noise levels if impact pile driving is used. Finally, CalEEMod defaults from the air quality analysis were used to generate an equipment list for the construction of the Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program category projects.

[5] A mounted impact hammer may also be referred to as a hydraulic breaker or hoe ram. This is a powerful percussion hammer that can be fitted to the arm of an excavator or another piece of heavy machinery. It is typically used for demolishing concrete structures or rocks.

Using this methodology, potential impact distances were calculated for the various construction phases that could be necessary at future projects. These results can be used in the future as screening distances beyond which the various construction activities would not generate significant impacts.

## Noise from Onsite Operations

A typical school site has a variety of potential noise sources. The actual sources will vary depending on the size of the campus and the grades served, but typical onsite sources include the following.

- Parking lots.
- Athletic fields, playgrounds, and playfields, which can include joint-use facilities used by the community.
- Athletic stadiums and other major athletic facilities (e.g., aquatic facilities or large fields with bleacher seating and public address [PA] systems).
- Mechanical equipment and other building services. One of the most common types of audible equipment is HVAC units, but this category may also include any other machinery that generates noise, such as central plant buildings, cooling towers, boilers, pumps, and exhaust fans.

Typical administrative facilities would generate noise from mechanical equipment and parking lots but would not include the type of outdoor activities found at school campuses. Noise from some sources can be usefully described using assumptions and representative data obtained from prior noise studies. Other sources are more complex and do not lend themselves to easy generalization. Each noise source category is discussed in greater detail below.

### Parking Lots

Parking lots are often quiet for long periods of time. During periods with low levels of activity (i.e., during hours when few vehicles arrive or depart) they generate only sporadic noise that does not add substantially to overall noise levels in the vicinity. However, parking lots can become noteworthy noise sources during periods of peak activity when many vehicles are arriving and/or leaving within the same hour. Guidance from the FTA (2018) provides screening criteria for noise impacts from parking facilities. The noise screening procedure is intended to be conservative and, as such, assumes facilities are operating under relatively high-capacity conditions, which would produce more noise than normal operating conditions. In the case of parking facilities, 1,000 vehicle movements (i.e., vehicles either arriving or departing) per hour are assumed, which is a higher level of activity than would be seen at most District parking lots. For these assumptions, the FTA indicates that noise would be expected to drop below 50 dBA 1-hour $L_{eq}$ at an unobstructed distance of 125 feet. For locations with intervening buildings (that would provide acoustical shielding), this distance is reduced to 75 feet. 50 dBA 1-hour $L_{eq}$ corresponds to the City's daytime noise limit at single family homes.

### Athletic Fields, Playgrounds, and Playfields

Noise from athletic fields, playgrounds, and playfields consists primarily of human voices, with varying combinations of talking, shouting, and laughing from students, teachers, coaches, and parents. For some activities, whistles from referees and coaches are also common. Noise measurements at schools and joint-use fields provide representative data that is useful in defining

noise levels from these facilities. Representative noise data is summarized in Table 4.10-7. None of the measured activities included amplified speech or music (e.g., bullhorns or PA systems).

**Table 4.10-7. Reference Noise Levels from Representative Soccer Games and Recess Periods**

| Noise Source | Measured Average ($L_{eq}$) Noise Level | Range of Distance to Noise Source | Acoustical Average Distance | Normalized to 100 feet[1] |
|---|---|---|---|---|
| Soccer game[2] | 59.9 dBA | 40 to 330 feet | 115 feet | 61.1 dBA |
| Soccer game[3] | 52.5 dBA | 87 to 413 feet | 190 feet | 58.1 dBA |
| Recess[4] | 63.7 dBA | 60 to 240 feet | 120 feet | 65.2 dBA |

[1] Adjusted for an acoustical average distance of 100 feet assuming a change of 6 dB per doubling of distance from the noise source.
[2] Source: Measured at Crusaders Youth Soccer games, Dailard Elementary Joint Use Park, San Diego, on Saturday, September 17, 2016. Total number of attendees (players on and off the field, referees, other officials, and spectators) varied from approximately 50 to 115 people.
[3] Source: Wieland Acoustics 2009. Little League soccer game, Jack R. Hammett Sports Complex (formerly "The Farm"), Costa Mesa CA. There were 11 players per team with approximately 35 spectators and a referee and other officials.
[4] Source: Measured at morning and lunch recess, Linda Vista Elementary School, San Diego, CA. The number of students visible across the exterior playground/field areas varied from approximately 20 to 150.

Extrapolating this data, it is possible to estimate the distances at which noise levels would be reduced to 50 dBA 1-hour $L_{eq}$, which corresponds to the City's daytime noise limit at single-family homes. These distances are shown in Table 4.10-8 and are used in the analysis of potential operational noise impacts from various project categories.

**Table 4.10-8. Distances Required to Reduce Soccer and Recess Noise Levels to 50 dBA 1-hour $L_{eq}$**

| Noise Source | Reference $L_{eq}$ at 100 feet (dBA)[1] | Distance from Activity Required to Reduce Noise Levels to 50 dBA 1-Hour $L_{eq}$ or Less (feet)[2] |
|---|---|---|
| Soccer game | 61.1 | 359 |
| Soccer game | 58.1 | 254 |
| Recess | 65.2 | 575 |

[1] Acoustical average distance.
[2] Acoustical average distance calculated assuming a change of 6 dB per doubling of distance from the noise source.

## Athletic Stadiums

At campuses that have an athletic stadium, such facilities typically produce higher noise levels than any other source on campus. The actual noise levels at nearby receptors can vary substantially based on factors such as the size of the stadium, type of events hosted, number of attendees, the relative layout and orientation, and details of the PA system used. Similar variability may be observed for competitive aquatics facilities that may draw large crowds and utilize PA systems and amplified "buzzers." As such, it is difficult to predict potential noise levels from such facilities on a Program-wide basis. Therefore, the analysis of athletic stadium noise levels is qualitative.

## Mechanical Equipment and Other Building Services

Noise will be produced by onsite mechanical equipment and other building services. The resulting noise levels at offsite receptors can vary dramatically depending on the type, size, number, and

location of equipment items. As such, it is impractical to predict potential noise levels from such equipment on a Program-wide basis. Therefore, the analysis of equipment noise levels is qualitative.

## Traffic Noise

Based on the programmatic nature of the traffic analysis prepared for the Proposed Program, it is not possible to quantify noise levels on individual streets around the various potential project sites. Such an analysis requires knowledge of the specific number of daily trips on individual roadway segments and how these would change in the future, both with and without a proposed project. Nonetheless, it is possible to draw some conclusions regarding the types of future projects that would or would not generate significant traffic noise impacts based on the nature of the individual project and the known effect of typical variables (traffic speed, number of trips per day, etc.) on overall traffic noise levels.

## Groundborne Vibration

As described in the impact analysis, the only potential source of substantial groundborne vibration associated with the Proposed Program would be construction. Construction-related vibration was analyzed using data and modeling methodologies provided by Caltrans' *Transportation and Construction Vibration Guidance Manual* (2013b). This guidance manual provides typical vibration source levels for various types of construction equipment as well as methods for estimating the propagation of groundborne vibration over distance. The metric used in the analysis is PPV. The same metric is used to assess the potential for building damage as well as the potential for human annoyance/disturbance.

Table 4.10-9 provides the reference PPV for various types of construction equipment expected to be used over the course of the Proposed Program. The levels are provided for a reference distance of 25 feet.

**Table 4.10-9. Construction Equipment Reference Vibration Levels**

| Equipment Item | Reference PPV at 25 feet (in/s)[1] |
|---|---|
| Pile driver (impact or vibratory) | 0.650 |
| Hydraulic Breaker[2] | 0.240 |
| Vibratory roller | 0.210 |
| Large bulldozer[3] | 0.089 |
| Drilling[4] | 0.089 |
| Jackhammer | 0.035 |
| Small bulldozer[5] | 0.003 |

[1] Obtained from Caltrans 2013b.

[2] Also commonly referred to as a hoe ram.

[3] Considered representative of other heavy earthmoving equipment such as excavators, graders, backhoes, etc.

[4] Based on caisson drilling.

[5] Considered representative of other smaller earthmoving equipment such as a Bobcat®, skid steer, etc.

The following equation from the guidance manual was used to estimate the change in PPV levels over distance.

$$PPV_{rec} = PPV_{ref} \times (25/D)^{n}$$

where $PPV_{rec}$ is the PPV at a receptor; $PPV_{ref}$ is the reference PPV at 25 feet from the equipment; D is the distance from the equipment to the receiver, in feet; and n is a value related to the vibration attenuation rate through ground (the default recommended value for n is 1.1).

Using this methodology, potential impact distances were calculated for the various types of vibration-generating construction equipment that could be used at future projects. Impact distances were calculated relative to thresholds for both potential building damage and for potential human annoyance. These results can be used in the future as screening distances beyond which the various construction activities would not generate significant impacts.

## 4.10.6.3 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines, as supplemented by the City's CEQA Significance Determination thresholds and noise standards, and provide the basis for determining the significance of impacts associated with noise and vibration resulting from the Proposed Program. The determination of whether a noise and vibration impact would be significant is based on the thresholds described below and the professional judgment of the District as Lead Agency and the recommendations of qualified personnel at ICF, all of which is based on the evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following.

1. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies. This impact may occur if:
    - Project construction activity occurs outside the permitted hours of 7 a.m. and 7 p.m. Monday through Saturday; or
    - Project construction activity generates a 12-hour $L_{eq}$ in excess of 75 dBA $L_{eq}$ at noise-sensitive land uses between 7 a.m. and 7 p.m.;
    - Project operations generate noise levels at noise-sensitive land uses that noticeably exceed existing ambient noise levels and the noise limits provided by Section 59.5.0401 of the City of San Diego Municipal Code; or
    - Project-generated traffic causes a noticeable increase in noise levels (3 dB or more) at any offsite noise-sensitive land use that would result in a noise level exceeding the applicable City of San Diego criterion (i.e., 65 dB CNEL at any offsite residence, hospital, nursing facility, intermediate care facility, school, day care, library, hotel, motel, or park, or 70 dB CNEL at any offsite church or museum).
2. Generation of excessive groundborne vibration or groundborne noise levels. This impact will be assessed at sensitive receptors using the criteria established by Caltrans (see Tables 4.10-3 and 4.10-4).
3. Be 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 and expose people residing or working in the project area to excessive noise levels.

# 4.10.6.4 Impacts and Mitigation Measures

***Threshold 1: Would the Proposed Program generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of reasonably foreseeable future projects in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?***

## Program-Level Analysis

The potential for significant construction noise impacts would depend on the combination of construction equipment used and the proximity of the work to sensitive receptors. As described in Section 4.10.2.6, *Noise-Sensitive Land Uses*, sensitive land uses include residential uses, hospitals, nursing facilities, intermediate care facilities, child educational facilities, libraries, museums, and child care facilities. While the City's construction noise ordinance only specifically discusses residential land uses, all generally accepted sensitive uses are assessed using the City's 75 dBA 12-hour $L_{eq}$ noise standard for construction. For the purposes of this PEIR, onsite learning spaces (classrooms, libraries, etc.) are also considered noise sensitive when occupied by students for academic purposes.

It is noted that the 75 dBA construction noise threshold is substantially higher than the City's standards for typical day-to-day noise sources or typical ambient noise levels at noise-sensitive land uses. As a result, it is almost guaranteed that any construction noise level that exceeds 75 dBA 12-hour $L_{eq}$ at a sensitive receptor would also noticeably increase existing ambient noise levels. For this reason, the question of whether construction noise increases ambient is effectively moot for practical purposes and the determination of significance will depend solely on whether the construction noise exceeds the City's 75 dBA 12-hour $L_{eq}$ noise standard. Any exterior construction activity that occurs outside the hours of 7 a.m. to 7 p.m. on weekdays and Saturdays or at any time on Sundays or legal holidays would cause a potentially significant impact.

As discussed under Section 4.10.6.2, *Methodology*, a typical school site has a variety of potential noise sources, including mechanical equipment, parking lots, athletic fields, playgrounds, playfields, and athletic stadiums. Typical administrative facilities would generate noise from mechanical equipment and parking lots but would not include the type of outdoor activities found at school campuses.

For future operational noise impacts to be significant, project noise levels must both noticeably exceed existing ambient noise levels and exceed the noise limits provided by Section 59.5.0401 of the City's Municipal Code. Such impacts would only occur where a project creates entirely new noise sources or substantially changes, expands, or relocates existing noise sources. Conversely, operational noise impacts would be less than significant for any future project that simply replaces existing facilities or equipment in-kind; this would include projects that repair, replace, or upgrade facilities and equipment with equivalent facilities and equipment in the same location. These general rules would apply to all of the analyzed project categories. More specific discussion of the potential impacts from each project category is provided in the following sections.

In addition, as discussed in Section 4.10.6.1, *Onsite Versus Offsite Impacts,* CEQA does not require an analysis of how the existing environmental conditions will affect a project's residents or users unless the project would exacerbate those conditions. Nonetheless it is noteworthy that several project

categories would, or have the potential to, develop new school buildings or substantially renovate existing school buildings that would be considered noise sensitive. These project categories are New Acquisition and New School or Administrative Facilities, Whole Site Modernization, and Upgrades of Existing School and Administrative Sites. Such buildings would be subject to applicable mandatory noise regulations as well as any voluntary guidelines applied by the District, which would occur independently of CEQA. Such regulations and guidelines could include CCR Title 5, CCR Title 24 Part 11, CHPS criteria, and ANSI standards. These regulations and guidelines may be updated or superseded over the course of the Proposed Program, and individual projects would be subject to whichever criteria are applicable at the time of site-specific development. Future compliance with these applicable regulations and guidelines would ensure adequate noise control for new school buildings on a project-by-project basis.

## New Acquisition and New School or Administrative Facilities

### Impact Discussion

#### *Construction*

Using the methodology described in Section 4.10.6.2, the impact distances within which construction noise would potentially exceed 75 dBA 12-hour $L_{eq}$ were calculated for the range of anticipated construction phases associated with these three project categories. The analyses are provided in Appendix I and the results are summarized in Tables 4.10-10 and 4.10-11. Table 4.10-10 is provided for comparison purposes and illustrates the relative noise level by comparing each phase at a reference distance of 50 feet. Table 4.10-11 shows the calculated distance from each phase of construction at which the noise level would be reduced to 75 dBA 12-hour $L_{eq}$. These can be considered screening distances, beyond which a given construction phase would not be expected to exceed the City's noise standard of 75 dB 12-hour $L_{eq}$. In general, these distances may be considered conservative because they neglect the potential noise reduction that may occur as a result of the presence of acoustically soft ground cover or barrier effects provided by intervening buildings, walls, fences, or topography. For the simplest and most conservative screening approach the distances may be considered the closest allowable distances between the active construction zone and a given receiver. However, if the equipment is expected to be mobile across a work area, then these distances will more accurately correspond to acoustical average distances. Because the exact distances from future construction work to any nearby sensitive receptors are currently not known it is possible that construction noise generated under the New Acquisition and New School or Administrative Facilities project category will exceed the threshold of 75 dBA 12-hour $L_{eq}$ (**Impact-NOI-1** and **Impact-NOI-2**). The impact would be significant.

**Table 4.10-10. Construction Noise Levels from Anticipated Construction Phases**

| Construction Phase | 12-Hour $L_{eq}$ at Reference Distance of 50 feet (dBA) |
|---|---|
| Demolition | 85 |
| Demolition with hydraulic breaker | 86 |
| Site preparation | 82 |
| Grading | 82 |
| Building construction | 81 |
| Paving | 80 |
| Architectural coating | 71 |

| Construction Phase | 12-Hour $L_{eq}$ at Reference Distance of 50 feet (dBA) |
|---|---|
| Joint-use fields | 85 |
| Pile driving | 93 |

**Table 4.10-11. Distances Required to Reduce Construction Noise Levels to Comply with City Ordinance**

| Construction Phase | Distance from Construction Activity Required to Reduce Noise Levels to 75 dBA 12-Hour $L_{eq}$ or Less (feet)[1] |
|---|---|
| Demolition | 153 |
| Demolition with hydraulic breaker | 186 |
| Site preparation | 114 |
| Grading | 113 |
| Building construction | 99 |
| Paving | 90 |
| Architectural coating | 32 |
| Joint-use fields | 154 |
| Pile driving | 377 |

[1] For screening purposes these distances may conservatively be considered the closest allowable distances between the active construction zone and a given receiver. However, if the equipment operating on any given day is expected to be mobile across a work area, then these distances may be considered acoustical average distances.

Implementation of **MM-NOI-1** through **MM-NOI-7** would be required. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to neighboring noise-sensitive land uses or the inability to construct efficient temporary noise barriers due to local terrain conditions, or engineering, constructability, or safety considerations. As a result, **Impact-NOI-1** and **Impact-NOI-2** would remain significant and unavoidable.

***Operation – Traffic***

This project category includes the acquisition of new properties and the construction of new school or administrative facilities. Whether these projects would result in significant noise impacts depends on several variables, such as the following.

- The overall number of new vehicle trips generated per day.
- The distribution of new trips on the local road network.
- Whether there are noise-sensitive receptors located along the affected roadways.
- The existing traffic volumes on the affected roadways.

It is not possible to accurately predict or make assumptions about these variables without details of future projects or their specific geographical location. Because these details have not been developed, it is not possible to make reliable predictions about the level of impact from traffic noise that would result from a new school or administrative facility. Consequently, because projects in this category have the clear potential to add new vehicle trips on roadways surrounding the affected project sites, it can be assumed that this new traffic could cause a noticeable increase (3 dB or more)

in noise levels that would result in a noise level greater than 65 dB CNEL at an offsite residence, hospital, nursing facility, intermediate care facility, school, day care, library, hotel, motel, or park, or 70 dB CNEL at an offsite church or museum (**Impact-NOI-3**). Traffic noise impacts from new school or administrative Facilities f would be significant.

Implementation of **MM-NOI-8** and **MM-NOI-9** would reduce **Impact-NOI-3**. However, with limited routes to and from District sites, it may not be possible to fully implement these measures and avoid traffic noise impacts at all nearby sensitive receptors. As a result, traffic noise impacts during construction of a new school or administrative facility would remain significant and unavoidable.

***Operation – Onsite Noise Sources***

Whether new school or administrative facilities would result in significant noise impacts depends on the operational project details, the proximity of noise-sensitive receptors, the receiving land use (because this will determine the applicable noise limit per the City's Municipal Code), and the existing ambient noise levels in the project vicinity. Based on the reference data described in Section 4.10.6.2, it can reasonably be concluded that no significant noise impacts from parking lot activities would occur if parking lots are located at least 125 feet from the closest noise-sensitive receptor, and no significant noise impacts from school playgrounds or athletic fields would occur if they are located at least 575 and 359 feet, respectively, from the closest noise-sensitive receptor. As noted in Section 4.10.6.2, these are acoustical average distances from the active source area.[6] In general, these distances may be considered conservative because they neglect the potential noise reduction that may occur as a result of the presence of acoustically soft ground cover or barrier effects provided by intervening buildings, walls, fences, or topography. They also do not account for existing ambient noise levels, which may serve to increase the allowable project noise levels.

Details of other anticipated noise sources, such as mechanical equipment and possible athletic stadiums, remain unknown. Consequently, it is not possible to make reliable predictions about the overall noise levels from onsite operations that would result from this category. Because projects in this category would clearly add new noise sources to a project site, it is possible that they could cause a noticeable increase (3 dB or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code (**Impact-NOI-4**). Operational noise impacts from onsite operations associated with new school or administrative facilities would be significant.

Implementation of **MM-NOI-10**, **MM-NOI-11**, and **MM-NOI-12** would reduce **Impact-NOI-4**. It is anticipated that **MM-NOI-11** will be fully implemented and will reduce noise from mechanical equipment to less-than-significant levels. However, it may not be possible to fully implement **MM-NOI-10** and **MM-NOI-12** for major athletic facilities and other onsite noise sources such as parking lots and playgrounds. Limitations may include the inability to locate these sources at sufficient distances from neighboring noise-sensitive land uses or the inability to construct effective noise barriers due to factors such as aesthetics, safety/security, or cost. In the case of major athletic facilities, the source noise level may simply be too high during large events to fully mitigate at nearby receptors. As a result, offsite noise impacts due to onsite operations of a new school or administrative facility would remain significant and unavoidable.

[6] For simplicity, these screening distances can be also be treated as the closest distance from the source to the receiver, but this is a conservative approach that will overestimate the potential impact.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-NOI-1: Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of New School or Administrative Facilities.** Noise levels due to various construction activities (phases) associated with new school or administrative facilities could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at residences or other offsite noise-sensitive receptors. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact.

**Impact-NOI-2: Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to New School or Administrative Facilities.** Noise levels due to various construction activities (phases) associated with new school or administrative facilities could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at onsite learning spaces (classrooms, libraries, etc.) while occupied by students for academic purposes. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13 of occupied onsite learning spaces. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact.

#### *Operation*

**Impact-NOI-3: Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips at New School or Administrative Facilities.** Vehicle trips generated by new school or administrative facilities have the potential to cause a traffic noise increase of 3 decibels (dB) Community Noise Equivalent Level (CNEL) or more that would result in a noise level greater than 65 dB CNEL at an offsite residence, hospital, nursing facility, intermediate care facility, school, day care, library, hotel, motel, or park, or 70 dB CNEL at an offsite church or museum. This is a potentially significant impact.

**Impact-NOI-4: Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code During Operation of New School or Administrative Facilities.** Operation of new school or administrative facilities have the potential to cause a noticeable increase (3 decibels or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code. This is a potentially significant impact.

### Mitigation Measures

For **Impact-NOI-1:**

> **MM-NOI-1: Conduct Site-Specific Reviews of Noise Impacts and, if Warranted, Conduct Additional Analyses.** Once individual project (i.e., site-specific) plans are available, an acoustical consultant shall be retained by the District to review noise impacts against the identified screening criteria, prior to implementation of further mitigation measures. If impacts

are confirmed, then no further analysis is required, and the project may proceed with implementation of the relevant mitigation measures described in this PEIR. However, at the District's discretion, new or more detailed analysis may be conducted in order to clarify site-specific impacts. These analyses may indicate that significant impacts will not, in fact, occur. In such cases, the acoustical consultant shall indicate which mitigation measure(s) are no longer required, and the District may modify or eliminate those measure(s) from the project accordingly at the approval of the project. The analysis and findings should be documented by the acoustical consultant in a memorandum or technical report.

**MM-NOI-2: Prohibit Exterior Construction Activities Outside of the City of San Diego's Permitted Construction Hours**. During construction of the project, the District shall require all contractors to limit exterior construction activities, including material or equipment deliveries and collections, to the hours of 7 a.m. to 7 p.m. on weekdays and Saturdays, with no such work at any time on Sundays or legal holidays. Except for construction personnel specifically working on interior construction tasks, construction personnel shall not be permitted on the job site outside of the permitted exterior construction hours.

**MM-NOI-3: Avoid Construction Within the Calculated Screening Distances of Noise-Sensitive Receptors.** During construction of the project, the District shall require all contractors to maintain adequate clearance from noise-sensitive offsite receptors based on the appropriate screening distance for each phase of construction, as identified in Tables 4.10-11 and 4.10-13.

**MM-NOI-4: Implement General Best Practices for Construction Noise Abatement.** During construction of the project, the District shall require all contractors to adhere to the following noise abatement measures:

- All construction equipment and vehicles using internal combustion engines will be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification.
- All mobile or fixed construction equipment used on the project that is regulated for noise output by a local, state, or federal agency will comply with such regulation while in the course of proposed project activity.
- All construction equipment will be properly maintained and serviced.
- All construction equipment will be operated only when necessary and will be switched off when not in use.
- Construction employees will be trained in the proper operation and use of the equipment to avoid careless or improper operation of equipment that could increase noise levels.
- Electrically powered equipment will be used instead of pneumatic or internal combustion powered equipment, where feasible.
- Material stockpiles and mobile equipment staging, parking, and maintenance areas will be located as far as practicable from noise-sensitive receptors.
- Construction site speed limits will be established and enforced during the construction period.

- The use of noise-producing signals, including horns, whistles, alarms, and bells, will be for safety warning purposes only.
- The contractor will provide advance written notification of construction activities to residences around the construction site. Notification will include a brief overview of the proposed construction activity and its purpose and schedule. It also will include the name and contact information of the project manager or representative responsible for resolving any noise concerns.

**MM-NOI-5: Install Temporary Noise Barriers to Shield Noise-Sensitive Receptors from Excessive Construction Noise Levels.** During construction of the project, the construction contractor shall install temporary noise barrier(s) between construction activities and noise-sensitive receptor(s) where noise levels are anticipated to exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$). The barriers shall be constructed as follows:

- The minimum height of the barriers will be 8 feet above ground level.
- The barriers will be positioned to block the line-of-sight between the construction equipment and the receiver.
- The barriers will be constructed from acoustical blankets hung over or from a supporting frame.
- The blankets will provide a minimum sound transmission class (STC) rating of 28.
- The blankets will be overlapped by at least 4 inches at seams and taped and/or closed with hook-and-loop fasteners (i.e., Velcro®) so that no gaps exist.
- The largest blankets available should be used to minimize the number of seams.
- The blankets will be draped to the ground to eliminate any gaps at the base of the barrier.

**MM-NOI-6: Avoid or Reduce Construction Noise from Pile Driving**. During construction activities, the District and its construction contractor shall take steps to reduce pile driving noise, if any, associated with the project. Possible noise reduction methods may include, but are not limited to, the following:

- Avoiding impact pile driving by using quieter alternative installation methods, such as press-in piles or drilled piles (e.g., cast-in-drilled-hole, poured-in-place piles).
- Using an acoustical shroud around impact pile driving. The shroud shall be constructed of materials that provide a minimum STC of 28 (examples include sound-rated acoustical blankets).

For **Impact-NOI-2:**

Implement **MM-NOI-1**, and **MM-NOI-3** through **MM-NOI-6**.

**MM-NOI-7: Coordinate Construction Activities to Avoid or Minimize Excessive Noise at Occupied Onsite Learning Spaces.** During construction activities, the District shall coordinate with all contractors to avoid excessive noise at occupied onsite learning spaces. Such coordination may include, but is not limited to, the following:

- Identifying days and times when school buildings or exterior facilities would be used for sensitive learning activities and maximizing the separation between these areas and construction equipment and heavy vehicles.

- Relocating sensitive learning activities to alternative classrooms or other spaces away from heavy construction activities.
- Shortening the construction work day and/or altering start and stop times to avoid particularly sensitive time periods such as student testing and exams.
- Scheduling interior construction and renovation work to occur outside of school hours, including at nighttime if necessary.

For **Impact-NOI-3**:

**MM-NOI-8: Conduct a Traffic Noise Analysis to Quantify the Traffic Effects of New District Sites.** During project-specific CEQA evaluations, in order to clarify the potential for substantial increases in traffic noise, the District shall retain a qualified traffic consultant to conduct analyses to quantify existing daily traffic volumes on the roadways surrounding the site as well as the anticipated increase in these traffic volumes as a result of the proposed project.

**MM-NOI-9**: **Plan Access Routes for New District Sites to Avoid Noise-Sensitive Land Uses and/or Encourage Use of Major Arterials as Opposed to Smaller Local Streets.** If site-specific traffic analysis indicates that substantial increases in daily traffic could occur then, where compatible with safety or other critical requirements, the District shall design ingress and egress at new facilities to encourage vehicle trips to utilize routes that avoid residential streets or other roadways adjacent to noise-sensitive receptors. Where such routes cannot be avoided, the District shall design site access to encourage trips along major roadways where the relative effect of increased traffic would be less noticeable.

For **Impact-NOI-4**:

**MM-NOI-10**: **Apply Administrative Controls and Incorporate Public Address System Design Features to Reduce Operational Noise Levels During All Use (School and Joint Use) of Any New or Redesigned Major Athletic Facilities.** During project planning and design phases, the District shall implement the following measures to control operational noise levels from new or redesigned major athletic facilities such as stadiums, large fields with bleacher seating and Public Address (PA) systems, or aquatic facilities with bleacher seating and PA systems. These measures shall apply to both District use and any use as part of a joint/community use agreement.

- The use of noise-generating equipment (bullhorns/megaphones, air horns, rattles, etc.) by spectators will be prohibited at all times.
- Use of the facilities for any noise-generating activity, excluding morning practice, will be prohibited from dusk until dawn each day, and shall not occur at any time before 7 a.m. or after 10 p.m. on any day.
- The proposed project will incorporate the following design features into the PA system that will be installed at the athletic field:
    - All speakers installed on the loudspeaker poles will have defined coverage patterns and be mounted in a way that the aiming of speakers can be adjusted at the time of installation both vertically and horizontally to maximize control of sound coverage.

- The aiming point of each loudspeaker (or loudspeaker cluster) will be individually adjusted to fit the minimal area of coverage to maximize the sound levels for the spectators and minimize the bleed over into the adjacent areas.
- Each loudspeaker cluster type will have independent parametric equalization and amplification control, allowing individual adjustment of frequency content and sound levels. In addition, the audio system will be programmed to provide compression and limiting that will control the maximum sound output level.
- The field, home bleachers, and visitor bleachers speaker systems will be designed to allow for independent activation via local control. This will allow for use of all speakers or a portion of the speakers depending on the needs of the event.
- Connection to an audio mixer will be provided with the system to adjust inputs and microphones and control the levels.
- The overall system volume will be adjusted and the maximum output will be limited to prevent additional amplification by end users.

**MM-NOI-11: Design and Install All New or Substantially Altered Mechanical Systems to Ensure All Mechanical Equipment Complies with Section 59.5.0401 of the City of San Diego Municipal Code at Nearby Noise-Sensitive Receptors.** during the architectural and engineering design phases of the project, and prior to the issuance of any building permits for the school buildings, an acoustical consultant shall be retained by the District to evaluate the mechanical system design and provide recommendations, as necessary, to ensure that exterior noise levels comply with the City's Municipal Code noise limits at nearby noise-sensitive land uses. Such recommendations may include, but are not limited to, the selection of quieter mechanical units, changes in unit locations, changes to rooftop parapet walls, and acoustical louvers or screens.

**MM-NOI-12: Design and Develop All Other New, Expanded, or Relocated Exterior Noise Sources so that Operational Noise Does Not Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use Resulting in an Exceedance of Section 59.5.0401 of the City of San Diego Municipal Code.** During the architectural and engineering design phases of the proposed project, and prior to the issuance of any building permits for the school buildings, an acoustical consultant shall be retained by the District to evaluate the potential noise impacts of ancillary outdoor noise sources such as new parking lots and playgrounds. The consultant shall assess the proposed project details and determine what, if any, additional analysis is required to quantify operational noise levels and potential noise control measures. Based on the consultant's professional experience, the assessment may range from a cursory review to detailed technical analysis. Noise control measures, if required, may include, but are not limited to, reorientation or relocation of noise sources, administrative controls on the times and intensity of use, or the addition of noise barriers or other acoustical screening.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-NOI-1** through **MM-NOI-6** would reduce **Impact-NOI-1**. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to

comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to neighboring noise-sensitive land uses or the inability to construct efficient temporary noise barriers due to local terrain conditions, or engineering, constructability, or safety considerations. As a result, construction noise impacts of new school or administrative facilities projects would remain significant and unavoidable.

Implementation of **MM-NOI-1**, **MM-NOI-3** through **MM-NOI-7** would reduce **Impact-NOI-2**. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to occupied onsite learning spaces, the inability to construct efficient temporary noise barriers, or limited options for relocating students away from construction zones. As a result, construction noise impacts of new school or administrative facilities projects would remain significant and unavoidable.

#### *Operation – Traffic*

Implementation of **MM-NOI-8** and **MM-NOI-9** would reduce **Impact-NOI-3**. However, with limited routes to and from District sites, it may not be possible to fully implement these measures and avoid traffic noise impacts at all nearby sensitive receptors. As a result, traffic noise impacts during operations of new school or administrative facilities would remain significant and unavoidable.

#### *Operation – Onsite Noise Sources*

Implementation of **MM-NOI-10** through **MM-NOI-12** would reduce **Impact-NOI-4**. It is anticipated that **MM-NOI-11** will be fully implemented and will reduce noise from mechanical equipment to less-than-significant levels. However, it may not be possible to fully implement **MM-NOI-10** and **MM-NOI-12** for major athletic facilities and other onsite noise sources such as parking lots and playgrounds. Limitations may include the inability to locate these sources at sufficient distances from neighboring noise-sensitive land uses or the inability to construct effective noise barriers due to factors such as aesthetics, safety/security, or cost. In the case of major athletic facilities, the source noise level may simply be too high during large events to fully mitigate at nearby receptors. As a result, offsite noise impacts due to onsite operations of new school or administrative facilities would remain significant and unavoidable.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

Using the methodology described in Section 4.10.6.2, the impact distances within which construction noise would potentially exceed 75 dBA 12-hour $L_{eq}$ were calculated for the range of anticipated construction phases associated with whole site modernization projects. The analyses are provided in Appendix I and the results are summarized in Tables 4.10-10 and 4.10-11. Table 4.10-10 is provided for comparison purposes and illustrates the relative noise level by comparing each phase at a reference distance of 50 feet. Table 4.10-11 shows the calculated distance from each phase of construction at which the noise level would be reduced to 75 dBA 12-hour $L_{eq}$. These can be considered screening distances, beyond which a given construction phase would not be expected to exceed the City's noise standard of 75 dB 12-hour $L_{eq}$. In general, these distances may be considered

conservative because they neglect the potential noise reduction that may occur as a result of the presence of acoustically soft ground cover or barrier effects provided by intervening buildings, walls, fences, or topography. For the simplest and most conservative screening approach the distances may be considered the closest allowable distances between the active construction zone and a given receiver. However, if the equipment is expected to be mobile across a work area, then these distances will more accurately correspond to acoustical average distances. Because the exact distances from future construction work to any nearby sensitive receptors are currently not known it is possible that construction noise generated during a whole site modernization project will exceed the threshold of 75 dBA 12-hour $L_{eq}$ (**Impact-NOI-5** and **Impact-NOI-6**). The impact would be significant.

Implementation of **MM-NOI-1** through **MM-NOI-7** would reduce these impacts. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to neighboring noise-sensitive land uses or the inability to construct efficient temporary noise barriers due to local terrain conditions, or engineering, constructability, or safety considerations. As a result, **Impact-NOI-5** and **Impact-NOI-6** would remain significant and unavoidable.

***Operation – Traffic***

Whole site modernization projects would not increase student capacity at any campus or increase the number of staff at District administrative facilities. However, in various ways they could alter traffic patterns surrounding the project sites. Examples include the following.

- Reconfiguring site access (driveways, pickup and drop-off locations, etc.), which could change the preferred routes to and from the site.
- Adding new facilities or opening existing facilities to the community for joint-use, which would increase trips from new users accessing the site (i.e., new trips over and above regular student or staff trips).

In order to generate a significant traffic noise impact, a project would have to cause a traffic noise increase of 3 dB CNEL or more that would result in a noise level greater than 65 dB CNEL at one or more offsite residences. Based on the lack of available site-specific traffic data, it is not possible to predict the future traffic noise levels that would occur on streets around any individual project site. However, based on standard decibel addition, a 3 dB traffic noise increase on any given roadway would require a doubling of daily traffic volumes. Therefore, it follows that the traffic noise impact of a project that does not double the daily traffic volume on any roadway would be less than significant. Given the lack of overall expansion proposed under each of this project category, it is likely that most of the associated traffic noise impacts would be less than significant. Nonetheless, the possibility exists that one or more projects in this category could cause a traffic noise increase of 3 dB CNEL or more that would result in a noise level greater than 65 dB CNEL at an offsite residence, hospital, nursing facility, intermediate care facility, school, day care, library, hotel, motel, or park, or 70 dB CNEL at an offsite church or museum (**Impact-NOI-7**). Consequently, traffic noise impacts during operations of whole site modernization projects would be significant.

Implementation of **MM-NOI-13** and **MM-NOI-14** would reduce **Impact-NOI-7**. However, with limited routes to and from existing District sites, it may not be possible to fully implement these measures and avoid traffic noise impacts at all nearby sensitive receptors. As a result, traffic noise

impacts during operations of whole site modernization projects would remain significant and unavoidable.

***Operation – Onsite Noise Source***

Whole site modernization projects would not increase student enrollment capacity at any campus or increase the number of staff at District administrative facilities. However, such projects may alter or reconfigure an existing campus. Because these projects would occur at existing sites with operational schools or District administrative facilities, determining the significance of any impact will primarily depend on whether the changes would increase existing noise levels by 3 dB or more at any sensitive receptor. Assuming all other variables remain constant, a single noise source would need to be shifted approximately 25% closer to a given receiver in order to increase noise levels by 3 dB. In general, this category of project would not be expected to generate significant noise impacts from onsite noise sources if it satisfies the following criteria.

1. The project would not introduce any substantial new operational noise source(s) that did not previously exist at the site without the project. Substantial new noise sources could include:
    a. Playgrounds.
    b. Athletic facilities, such as new athletic fields, artificial turf fields, stadiums, and PA systems.
    c. Driveways, drop-off zones, bus loading areas, and parking lots.
2. The project would not add exterior lighting to extend the operation of athletic facilities into the evening or nighttime hours (i.e., after 7 p.m.) where such operations do not currently occur.
3. The project would not relocate any substantial existing noise source (parking lot, playground, mechanical equipment, etc.) more than 25% closer to a noise-sensitive receptor.
4. New mechanical equipment installed as part of the project would replace similar existing equipment at the same location and would not remove acoustical shielding between the equipment and offsite sensitive receptors.

Projects that do not satisfy all of these criteria (i.e., those that add or substantially relocate noise sources) have the potential to cause a noticeable increase (3 dB or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code (**Impact-NOI-8**). Operational noise impacts from onsite operations associated with whole site modernization would be significant.

Implementation of **MM-NOI-10**, **MM-NOI-11**, and **MM-NOI-12** would reduce **Impact-NOI-8**. It is anticipated that **MM-NOI-11** will be fully implemented and will reduce noise from mechanical equipment to less-than-significant levels. However, it may not be possible to fully implement **MM-NOI-12** for major athletic facilities and other onsite noise sources such as parking lots and playgrounds. Limitations may include the inability to locate these sources at sufficient distances from neighboring noise-sensitive land uses or the inability to construct effective noise barriers due to factors such as aesthetics, safety/security, or cost. In the case of major athletic facilities, the source noise level may simply be too high during large events to fully mitigate at nearby receptors. As a result, offsite noise impacts due to onsite operations associated with whole site modernization projects would remain significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-NOI-5: Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of Whole Site Modernization Projects.** Noise levels due to various construction activities (phases) associated with whole site modernization projects could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at residences or other offsite noise-sensitive receptors. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact.

**Impact-NOI-6: Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to Whole Site Modernization Projects.** Noise levels due to various construction activities (phases) associated with whole site modernization projects could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at onsite learning spaces (classrooms, libraries, etc.) while occupied by students for academic purposes. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13 of occupied onsite learning spaces. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact.

#### *Operation – Traffic*

**Impact-NOI-7: Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips or Altered Traffic Patterns.** Increased vehicle trips on local roadways could be generated by new facilities, expanded use of existing facilities, or redirection of traffic patterns due to reconfiguration of site access and layout. These changes have the potential to cause a traffic noise increase of 3 decibels (dB) Community Noise Equivalent Level (CNEL) or more that would result in a noise level greater than 65 dB CNEL at an offsite residence, hospital, nursing facility, intermediate care facility, school, day care, library, hotel, motel, or park, or 70 dB CNEL at an offsite church or museum. This is a potentially significant impact.

#### *Operation – Onsite Noise Sources*

**Impact-NOI-8: Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code During Operation of an Existing District Facility.** Operation of expanded or reconfigured operations at existing facilities have the potential to cause a noticeable increase (3 decibels or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code. This is a potentially significant impact.

### Mitigation Measures

For **Impact-NOI-5**:

Implement **MM-NOI-1** through **MM-NOI-6**, as described above.

For **Impact-NOI-6**:

Implement **MM-NOI-1**, and **MM-NOI-3** through **MM-NOI-7**, as described above.

For **Impact-NOI-7**:

**MM-NOI-13: Conduct a Traffic Noise Analysis to Quantify the Traffic Effects of Redesigned Project Sites, Including New or Expanded Onsite Facilities.** During project-specific CEQA evaluations, in order to clarify the potential for substantial increases in traffic noise, the District shall retain a qualified traffic consultant to conduct analyses to quantify existing daily traffic volumes on the roadways surrounding the site, as well as the anticipated change in trip distribution and traffic volumes on these roadways as a result of the project.

**MM-NOI-14**: **Plan Access Routes for Redesigned Project Sites, Including New or Expanded Onsite Facilities to Avoid Substantial Traffic Increases Adjacent to Noise-Sensitive Land Uses.** If site-specific traffic analysis indicates that substantial increases in daily traffic could occur then, where compatible with safety or other critical requirements, the District shall redesign or relocate ingress and egress at existing facilities to encourage vehicle trips to utilize routes that avoid residential streets or other roadways adjacent to noise-sensitive receptors. Where such routes cannot be avoided, the District shall design site access to encourage trips along routes where the relative effect of increased traffic would be less noticeable; this could include major roadways or the roadways that currently provide primary access to the site.

For **Impact-NOI-8**:

Implement **MM-NOI-10** through **MM-NOI-12**, as described above.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-NOI-1** through **MM-NOI-6** would reduce **Impact-NOI-5**. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to neighboring noise-sensitive land uses or the inability to construct efficient temporary noise barriers due to local terrain conditions, or engineering, constructability, or safety considerations. As a result, construction noise impacts during whole site modernization projects would remain significant and unavoidable.

Implementation of **MM-NOI-1**, and **MM-NOI-3** through **MM-NOI-7** would reduce **Impact-NOI-6**. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to occupied onsite learning spaces, the inability to construct efficient temporary noise barriers, or limited options for relocating students away from construction zones. As a result, construction noise impacts during whole site modernization projects would remain significant and unavoidable.

#### *Operation – Traffic*

Implementation of **MM-NOI-13** and **MM-NOI-14** would reduce **Impact-NOI-7**. However, with limited routes to and from existing District sites, it may not be possible to fully implement these measures and avoid traffic noise impacts at all nearby sensitive receptors. As a result, traffic noise

impacts during operations of whole site modernization projects would remain significant and unavoidable.

***Operation – Onsite Noise Sources***

Implementation of **MM-NOI-10** through **MM-NOI-12** would reduce **Impact-NOI-8**. It is anticipated that **MM-NOI-11** will be fully implemented and will reduce noise from mechanical equipment to less-than-significant levels. However, it may not be possible to fully implement **MM-NOI-12** for major athletic facilities and other onsite noise sources such as parking lots and playgrounds. Limitations may include the inability to locate these sources at sufficient distances from neighboring noise-sensitive land uses or the inability to construct effective noise barriers due to factors such as aesthetics, safety/security, or cost. In the case of major athletic facilities, the source noise level may simply be too high during large events to fully mitigate at nearby receptors. As a result, offsite noise impacts due to onsite operations of whole site modernization projects would remain significant and unavoidable.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

***Construction***

Using the methodology described in Section 4.10.6.2, the impact distances within which construction noise would potentially exceed 75 dBA 12-hour $L_{eq}$ were calculated for the range of anticipated construction phases associated with upgrades of existing school and administrative sites. The analyses are provided in Appendix I and the results are summarized in Tables 4.10-10 and 4.10-11. Table 4.10-10 is provided for comparison purposes and illustrates the relative noise level by comparing each phase at a reference distance of 50 feet. Table 4.10-11 shows the calculated distance from each phase of construction at which the noise level would be reduced to 75 dBA 12-hour $L_{eq}$. These can be considered screening distances, beyond which a given construction phase would not be expected to exceed the City's noise standard of 75 dB 12-hour $L_{eq}$. In general, these distances may be considered conservative because they neglect the potential noise reduction that may occur as a result of the presence of acoustically soft ground cover or barrier effects provided by intervening buildings, walls, fences, or topography. For the simplest and most conservative screening approach the distances may be considered the closest allowable distances between the active construction zone and a given receiver. However, if the equipment is expected to be mobile across a work area, then these distances will more accurately correspond to acoustical average distances. Because the exact distances from future construction work to any nearby sensitive receptors are currently not known it is possible that construction noise generated during upgrades of existing school and administrative sites will exceed the threshold of 75 dBA 12-hour $L_{eq}$ (**Impact-NOI-9** and **Impact-NOI-10**). The impact would be significant.

Implementation of **MM-NOI-1** through **MM-NOI-7** would reduce these impacts. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to neighboring noise-sensitive land uses or the inability to construct efficient temporary noise barriers due to local terrain conditions, or engineering, constructability, or safety considerations. As a result, **Impact-NOI-9** and **Impact-NOI-10** would remain significant and unavoidable.

***Operation – Traffic***

Upgrades of existing school or administrative facilities would not increase student capacity at any campus or increase the number of staff at District administrative facilities. However, they could involve reconfiguring site access (driveways, pickup and drop-off locations, etc.), which could change the preferred routes to and from the site.

In order to generate a significant traffic noise impact, a project would have to cause a traffic noise increase of 3 dB CNEL or more that would result in a noise level greater than 65 dB CNEL at one or more offsite residences. Based on the lack of available site-specific traffic data, it is not possible to predict the future traffic noise levels that would occur on streets around any individual project site. However, based on standard decibel addition, a 3 dB traffic noise increase on any given roadway would require a doubling of daily traffic volumes. Therefore, it follows that the traffic noise impact of a project that does not double the daily traffic volume on any roadway would be less than significant. Given the lack of overall expansion proposed under this project category, it is likely that most of the associated traffic noise impacts would be less than significant. Nonetheless, the possibility exists that one or more projects in this category could cause a traffic noise increase of 3 dB CNEL or more that would result in a noise level greater than 65 dB CNEL at an offsite residence, hospital, nursing facility, intermediate care facility, school, day care, library, hotel, motel, or park, or 70 dB CNEL at an offsite church or museum (**Impact-NOI-7**). Consequently, traffic noise impacts during operations associated with upgrades of existing school or administrative sites would be significant.

Implementation of **MM-NOI-13** and **MM-NOI-14** would reduce **Impact-NOI-7**. However, with limited routes to and from existing District sites, it may not be possible to fully implement these measures and avoid traffic noise impacts at all nearby sensitive receptors. As a result, traffic noise impacts during operations associated with upgrades of existing school and administrative sites would remain significant and unavoidable.

***Operation – Onsite Noise Source***

Upgrades of existing school and administrative sites would not increase student capacity at any campus or increase the number of staff at District administrative facilities. However, such projects may alter or reconfigure an existing campus. Because these projects would occur at existing sites with operational schools or District administrative facilities, determining the significance of any impact will primarily depend on whether the changes would increase existing noise levels by 3 dB or more at any sensitive receptor. Assuming all other variables remain constant, a single noise source would need to be shifted approximately 25% closer to a given receiver in order to increase noise levels by 3 dB. In general, this category of project would not be expected to generate significant noise impacts from onsite noise sources if it satisfies the following criteria.

5. The project would not introduce any substantial new operational noise source(s) that did not previously exist at the site without the project. Substantial new noise sources could include:
    a. Playgrounds.
    b. Athletic facilities, such as new athletic fields, artificial turf fields, stadiums, and PA systems.
    c. Driveways, drop-off zones, bus loading areas, and parking lots.
6. The project would not add exterior lighting to extend the operation of athletic facilities into the evening or nighttime hours (i.e., after 7 p.m.) where such operations do not currently occur.

7. The project would not relocate any substantial existing noise source (parking lot, playground, mechanical equipment, etc.) more than 25% closer to a noise-sensitive receptor.
8. New mechanical equipment installed as part of the project would replace similar existing equipment at the same location and would not remove acoustical shielding between the equipment and offsite sensitive receptors.

Projects that do not satisfy all of these criteria (i.e., those that add or substantially relocate noise sources) have the potential to cause a noticeable increase (3 dB or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code (**Impact-NOI-8**). Operational noise impacts from onsite operations associated with upgrades of existing school and administrative sites would be significant.

Implementation of **MM-NOI-10**, **MM-NOI-11**, and **MM-NOI-12** would reduce **Impact-NOI-8**. It is anticipated that **MM-NOI-11** will be fully implemented and will reduce noise from mechanical equipment to less-than-significant levels. However, it may not be possible to fully implement **MM-NOI-10** and **MM-NOI-12** for major athletic facilities and other onsite noise sources such as parking lots and playgrounds. Limitations may include the inability to locate these sources at sufficient distances from neighboring noise-sensitive land uses or the inability to construct effective noise barriers due to factors such as aesthetics, safety/security, or cost. In the case of major athletic facilities, the source noise level may simply be too high during large events to fully mitigate at nearby receptors. As a result, offsite noise impacts due to onsite operations associated with upgrades of existing school and administrative sites would remain significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-NOI-9: Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction Activities Associated with Upgrades of Existing School and Administrative Sites.** Noise levels due to various construction activities (phases) associated with upgrades of existing school and administrative sites could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at residences or other offsite noise-sensitive receptors. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact.

**Impact-NOI-10: Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to Upgrades of Existing School and Administrative Sites.** Noise levels due to various construction activities (phases) associated with upgrades of existing school and administrative sites could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at onsite learning spaces (classrooms, libraries, etc.) while occupied by students for academic purposes. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13 of occupied onsite learning spaces. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact.

***Operation – Traffic***

**Impact-NOI-7: Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips or Altered Traffic Patterns.** Increased vehicle trips on local roadways could be generated by new facilities, expanded use of existing facilities, or redirection of traffic patterns due to reconfiguration of site access and layout. These changes have the potential to cause a traffic noise increase of 3 decibels (dB) Community Noise Equivalent Level (CNEL) or more that would result in a noise level greater than 65 dB CNEL at an offsite residence, hospital, nursing facility, intermediate care facility, school, day care, library, hotel, motel, or park, or 70 dB CNEL at an offsite church or museum. This is a potentially significant impact.

***Operation – Onsite Noise Sources***

**Impact-NOI-8: Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code During Operation of an Existing District Facility.** Operation of expanded, or reconfigured, operations at existing facilities have the potential to cause a noticeable increase (3 decibels or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code. This is a potentially significant impact.

### Mitigation Measures

For **Impact-NOI-7**:

Implement **MM-NOI-13** and **MM-NOI-14**, as described above.

For **Impact-NOI-8**:

Implement **MM-NOI-10** through **MM-NOI-12**, as described above.

For **Impact-NOI-9**:

Implement **MM-NOI-1** through **MM-NOI-6**, as described above.

For **Impact-NOI-10**:

Implement **MM-NOI-1**, and **MM-NOI-3** through **MM-NOI-7**, as described above.

### Level of Significance After Mitigation

***Construction***

Implementation of **MM-NOI-1** through **MM-NOI-6** would reduce **Impact-NOI-9**. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to neighboring noise-sensitive land uses or the inability to construct efficient temporary noise barriers due to local terrain conditions, or engineering, constructability, or safety considerations. As a result, construction noise impacts during upgrades of existing school and administrative sites would remain significant and unavoidable.

Implementation of **MM-NOI-1** and **MM-NOI-3** through **MM-NOI-7** would reduce **Impact-NOI-10**. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to occupied onsite learning spaces, the inability to construct efficient temporary noise barriers, or limited options for relocating students away from construction zones. As a result, construction noise impacts during upgrades of existing school and administrative sites would remain significant and unavoidable.

#### *Operation – Traffic*

Implementation of **MM-NOI-13** and **MM-NOI-14** would reduce **Impact-NOI-7**. However, with limited routes to and from existing District sites, it may not be possible to fully implement these measures and avoid traffic noise impacts at all nearby sensitive receptors. As a result, traffic noise impacts associated with operations following upgrades of existing school and administrative sites would remain significant and unavoidable.

#### *Operation – Onsite Noise Sources*

Implementation of **MM-NOI-10** through **MM-NOI-12** would reduce **Impact-NOI-8**. It is anticipated that **MM-NOI-11** will be fully implemented and will reduce noise from mechanical equipment to less-than-significant levels. However, it may not be possible to fully implement **MM-NOI-10** and **MM-NOI-12** for major athletic facilities and other onsite noise sources such as parking lots and playgrounds. Limitations may include the inability to locate these sources at sufficient distances from neighboring noise-sensitive land uses or the inability to construct effective noise barriers due to factors such as aesthetics, safety/security, or cost. In the case of major athletic facilities, the source noise level may simply be too high during large events to fully mitigate at nearby receptors. As a result, offsite noise impacts due to onsite operations following upgrades of existing school and administrative sites would remain significant and unavoidable.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

The impact distances within which construction noise would potentially exceed 75 dBA 12-hour $L_{eq}$ were calculated for the anticipated joint-use facilities construction scenario. The analysis is provided in Appendix I and the results are summarized in Tables 4.10-12 and 4.10-13. Table 4.10-12 illustrates the calculated noise level at a reference distance of 50 feet. Table 4.10-13 shows the calculated distance from each phase of construction at which the noise level would be reduced to 75 dBA 12-hour $L_{eq}$. This can be considered a screening distance beyond which joint-use facilities construction would not be expected to exceed the City's noise standard of 75 dB 12-hour $L_{eq}$. The calculated distance may be slightly conservative because it neglects the potential noise reductions from acoustically soft ground cover or barrier effects. For the simplest and most conservative screening approach the distance may be considered the closest allowable distance between the active construction zone and a given receiver. However, if the equipment is expected to be mobile across a work area, then the screening distance will more accurately correspond to an acoustical average distance. Because the exact distances from future joint-use facilities construction work to any nearby sensitive receptors are currently not known it is possible that construction noise

generated under this category would exceed the threshold of 75 dBA 12-hour $L_{eq}$ (**Impact-NOI-11** and **Impact-NOI-12**). The impact would be significant.

**Table 4.10-12. Construction Noise Levels from Joint-Use Facilities Construction**

| Construction Phase | 12-Hour $L_{eq}$ at Reference Distance of 50 feet |
|---|---|
| Joint-use facilities | 85 dBA |

**Table 4.10-13. Distances Required to Reduce Joint-Use Facilities Construction Noise Levels to Comply with City Ordinance**

| Construction Phase | Distance from Construction Activity Required to Reduce Noise Levels to 75 dBA 12-Hour $L_{eq}$ or Less[1] |
|---|---|
| Joint-use facilities | 154 feet |

[1] For screening purposes this distance may conservatively be considered the closest allowable distance between the active construction zone and a given receiver. However, if the equipment operating on any given day is expected to be mobile across a work area, then these distances may be considered acoustical average distances.

Implementation of **MM-NOI-1** through **MM-NOI-7** would reduce these impacts. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to neighboring noise-sensitive land uses or the inability to construct efficient temporary noise barriers due to local terrain conditions, or engineering, constructability, or safety considerations. As a result, **Impact-NOI-11** and **Impact-NOI-12** would remain significant and unavoidable.

***Operation – Traffic***

Joint-use facilities would not increase student capacity at any campus or increase the number of staff at District administrative facilities. However, in various ways they could alter traffic patterns surrounding the project sites. Examples include the following.

- Reconfiguring site access (driveways, pickup and drop-off locations, etc.), which could change the preferred routes to and from the site.
- Adding new facilities or opening existing facilities to the community for joint-use, which would increase trips from new users accessing the site (i.e., new trips over and above regular student or staff trips).

In order to generate a significant traffic noise impact, a project would have to cause a traffic noise increase of 3 dB CNEL or more that would result in a noise level greater than 65 dB CNEL at one or more offsite residences. Based on the lack of available site-specific traffic data, it is not possible to predict the future traffic noise levels that would occur on streets around any individual project site. However, based on standard decibel addition, a 3 dB traffic noise increase on any given roadway would require a doubling of daily traffic volumes. Therefore, it follows that the traffic noise impact of a project that does not double the daily traffic volume on any roadway would be less than significant. Given the lack of overall expansion proposed under each of these project categories, it is likely that most of the associated traffic noise impacts would be less than significant. Nonetheless, the possibility exists that one or more projects in these categories could cause a traffic noise increase of 3 dB CNEL or more that would result in a noise level greater than 65 dB CNEL at an

offsite residence, hospital, nursing facility, intermediate care facility, school, day care, library, hotel, motel, or park, or 70 dB CNEL at an offsite church or museum (**Impact-NOI-7**). Consequently, traffic noise impacts from operations of joint-use facilities would be significant.

Implementation of **MM-NOI-13** and **MM-NOI-14** would reduce **Impact-NOI-7**. However, with limited routes to and from existing District sites, it may not be possible to fully implement these measures and avoid traffic noise impacts at all nearby sensitive receptors. As a result, traffic noise impacts associated with operations of joint use facilities would remain significant and unavoidable.

***Operation – Onsite Noise Sources***

For new joint-use facilities, the significance of the noise impact would depend on the operational project details, the proximity of noise-sensitive receptors, the receiving land use (because this will determine the applicable noise limit per the City's Municipal Code), and the existing ambient noise levels in the project vicinity. Based on the reference data gathered at youth soccer games (see Tables 4.10-7 and 4.10-8), it is anticipated that joint-use activities could generate noise levels approaching 60 dBA $L_{eq}$ at nearby noise-sensitive receptors. Table 4.10-14 extrapolates the worst case (loudest) data to estimate the distances at which joint-use facilities would be expected to comply with the City's daytime and evening noise limits for single-family and multifamily land uses. As noted in the table, these are acoustical average distances from the active source area.[7] These can be considered screening distances, beyond which joint-use projects would not be expected to exceed the City's noise ordinance standards. These distances should be considered conservative because they neglect the potential noise reduction that may occur as a result of the presence of acoustically soft ground cover or barrier effects provided by intervening buildings, walls, fences, or topography. They also do not account for existing ambient noise levels, which may serve to increase the allowable project noise levels. Because the exact distances from future joint-use facilities to any nearby sensitive receptors are currently not known, it is possible that exterior operational noise from these projects would cause a noticeable increase (3 dB or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code (**Impact-NOI-8**). Operational noise impacts from onsite operations associated with joint-use facilities would be significant.

**Table 4.10-14. Distances Required to Reduce Joint-Use Facility Activities to Comply with the City Noise Ordinance**

| | | Distance[2] from Activity Required to Reduce Noise Levels to: | | |
|---|---|---|---|---|
| **Noise Source** | **Reference $L_{eq}$ at 100 feet[1]** | **55 dBA 1-Hour $L_{eq}$ or Less[3]** | **50 dBA 1-Hour $L_{eq}$ or Less[4]** | **45 dBA 1-Hour $L_{eq}$ or Less[5]** |
| Soccer game | 61.1 dBA | 202 feet | 359 feet | 638 feet |

[1] Acoustical average distance.

[2] Acoustical average distance calculated assuming a change of 6 dB per doubling of distance from the noise source.

[3] 55 dBA 1-Hour $L_{eq}$ is the daytime noise standard for multifamily residential uses.

[4] 50 dBA 1-Hour $L_{eq}$ is the daytime noise standard for single-family residential uses and the evening noise standard for multifamily residential uses.

[5] 45 dBA 1-Hour $L_{eq}$ is the evening noise standard for single-family residential uses.

[7] For simplicity, these screening distances can be also be treated as the closest distance from the source to the receiver, but this is a conservative approach that will overestimate the potential impact.

Implementation of **MM-NOI-10**, **MM-NOI-11**, **MM-NOI-12,** and **MM-NOI-15** would reduce **Impact-NOI-8**. It is anticipated that **MM-NOI-11** and **MM-NOI-15** will be fully implemented and will reduce noise from mechanical equipment to less-than-significant levels. However, it may not be possible to fully implement **MM-NOI-10** and **MM-NOI-12** for major athletic facilities and other onsite noise sources such as parking lots and playgrounds. Limitations may include the inability to locate these sources at sufficient distances from neighboring noise-sensitive land uses or the inability to construct effective noise barriers due to factors such as aesthetics, safety/security, or cost. In the case of major athletic facilities, the source noise level may simply be too high during large events to fully mitigate at nearby receptors. As a result, offsite noise impacts due to onsite operations of joint-use facilities would remain significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-NOI-11: Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of Joint-Use Facilities.** Noise levels due to various construction activities (phases) associated with joint-use facilities could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at residences or other offsite noise-sensitive receptors. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact.

**Impact-NOI-12: Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Associated with Joint-Use Facilities.** Noise levels due to various construction activities (phases) associated with joint-use facilities could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at onsite learning spaces (classrooms, libraries, etc.) while occupied by students for academic purposes. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13 of occupied onsite learning spaces. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact.

#### *Operation – Traffic*

**Impact-NOI-7: Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips or Altered Traffic Patterns.** Increased vehicle trips on local roadways could be generated by new facilities, expanded use of existing facilities, or redirection of traffic patterns due to reconfiguration of site access and layout. These changes have the potential to cause a traffic noise increase of 3 decibels (dB) Community Noise Equivalent Level (CNEL) or more that would result in a noise level greater than 65 dB CNEL at an offsite residence, hospital, nursing facility, intermediate care facility, school, day care, library, hotel, motel, or park, or 70 dB CNEL at an offsite church or museum. This is a potentially significant impact.

***Operation – Onsite Noise Sources***

**Impact-NOI-8: Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code During Operation of an Existing District Facility.** Operation of expanded, or reconfigured, operations at existing facilities have the potential to cause a noticeable increase (3 decibels or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code. This is a potentially significant impact.

**Mitigation Measures**

For **Impact-NOI-11:**

Implement **MM-NOI-1** through **MM-NOI-6**, as described above.

For **Impact-NOI-12:**

Implement **MM-NOI-1**, and **MM-NOI-3** through **MM-NOI-7**, as described above.

For **Impact-NOI-7**:

Implement **MM-NOI-13** and **MM-NOI-14**, as described above**.**

For **Impact-NOI-8**:

Implement **MM-NOI-10** through **MM-NOI-12**, as described above.

**MM-NOI-15**: **Control Noise and Minimize Potential Annoyance from Joint-Use Facilities.** During contract development for joint-use facilities, the District shall implement into contracts and agreements the following measures to control operational noise levels from joint-use facilities other than "major athletic facilities." Operational limitations shall be incorporated into all use agreements between the District, the City, and/or groups using the fields (sports leagues, etc.).

- The use of noise-generating equipment (permanent or temporary public address systems, bullhorns, air horns, etc.) at the facilities will be prohibited at all times. The only exception is for the use of whistles as needed by coaches, referees, or other game officials.
- Use of the facilities for any noise-generating activity will be prohibited from dusk until dawn each day, and shall not occur at any time before 7 a.m. or after 10 p.m. on any day. Signs to this effect will be prominently posted at each joint-use field site.
- City of San Diego Parks and Recreation staff will work closely with user groups to ensure that their use of the facilities does not negatively impact neighborhoods through excessive noise.
- If noise complaints are received regarding the joint-use facilities, City staff shall respond during normal business hours, investigate the complaint as necessary, and undertake additional steps as needed to address the complaint. Additional steps may include, but are not limited to, the following:
    - Enforcing applicable conditions of any permits under which the subject activity is conducted.
    - Working with user groups to avoid problematic activities or behaviors.

- Imposing additional limits on hours during which particularly noisy activities can occur at the facilities.
- Conducting noise measurements to confirm noise levels at sensitive receptors.
- Revoking permits for user groups if they generate ongoing noise violations that cannot be remedied.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-NOI-1** through **MM-NOI-6** would reduce **Impact-NOI-11**. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to neighboring noise-sensitive land uses or the inability to construct efficient temporary noise barriers due to local terrain conditions, or engineering, constructability, or safety considerations. As a result, noise impacts associated with construction of joint-use facilities would remain significant and unavoidable.

Implementation of **MM-NOI-1** and **MM-NOI-3**, through **MM-NOI-7** would reduce **Impact-NOI-12**. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to occupied onsite learning spaces, the inability to construct efficient temporary noise barriers, or limited options for relocating students away from construction zones. As a result, noise impacts associated with construction of joint-use facilities would remain significant and unavoidable.

#### *Operation – Traffic*

Implementation of **MM-NOI-13** and **MM-NOI-14** would reduce **Impact-NOI-7**. However, with limited routes to and from existing District sites, it may not be possible to fully implement these measures and avoid traffic noise impacts at all nearby sensitive receptors. As a result, traffic noise impacts associated with operations of joint-use facilities would remain significant and unavoidable.

#### *Operation – Onsite Noise Sources*

Implementation of **MM-NOI-10**, **MM-NOI-11**, **MM-NOI-12,** and **MM-NOI-15** would reduce **Impact-NOI-8**. It is anticipated that **MM-NOI-11** and **MM-NOI-15** will be fully implemented and will reduce noise from mechanical equipment to less-than-significant levels. However, it may not be possible to fully implement **MM-NOI-10** and **MM-NOI-12** for major athletic facilities and other onsite noise sources such as parking lots and playgrounds. Limitations may include the inability to locate these sources at sufficient distances from neighboring noise-sensitive land uses or the inability to construct effective noise barriers due to factors such as aesthetics, safety/security, or cost. In the case of major athletic facilities, the source noise level may simply be too high during large events to fully mitigate at nearby receptors. As a result, offsite noise impacts due to onsite operations of joint-use facilities would remain significant and unavoidable.

# Site-Specific Analysis

## Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.10-15. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the Whole Site Modernization project category, as described further in Chapter 3, *Project Description*.

**Table 4.10-15. Near-Term Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019.

### Construction

There are currently no specific proposed plans or details for the improvements that would occur at the 21 school sites identified for near-term, site-specific whole site modernization projects. Consistent with the assumptions used in the Program-Level Analysis, each of the 21 schools are in proximity to homes and/or other noise-sensitive uses that could potentially be impacted by changes at those campuses. The possible exception is Perkins K-8, which is located in a mixed-use neighborhood with industrial uses nearby and increased separation between the campus and the closest noise-sensitive receptors.

As detailed for the *Program-Level Analysis,* above, impact distances within which construction noise would potentially exceed 75 dBA 12-hour $L_{eq}$ were calculated for the range of anticipated construction phases associated with whole site modernization projects. The analyses are provided in Appendix I and the results are summarized in Tables 4.10-10 and 4.10-11. Table 4.10-10 is provided for comparison purposes and illustrates the relative noise level by comparing each phase at a reference distance of 50 feet. Table 4.10-11 shows the calculated distance from each phase of construction at which the noise level would be reduced to 75 dBA 12-hour $L_{eq}$. These can be considered screening distances, beyond which a given construction phase would not be expected to exceed the City's noise standard of 75 dB 12-hour $L_{eq}$. In general, these distances may be considered conservative because they neglect the potential noise reduction that may occur as a result of the presence of acoustically soft ground cover or barrier effects provided by intervening buildings, walls, fences, or topography. For the simplest and most conservative screening approach the distances may be considered the closest allowable distances between the active construction zone and a given receiver. However, if the equipment is expected to be mobile across a work area, then these distances will more accurately correspond to acoustical average distances. Because the exact distances from future construction work to any nearby sensitive receptors are currently not known it is possible that construction noise generated during the near-term, site-specific whole site modernization projects will exceed the threshold of 75 dBA 12-hour $L_{eq}$ (**Impact-NOI-5** and **Impact-NOI-6)**. These impacts would be significant.

### Operation – Traffic

Near-term, site-specific whole site modernization projects would not increase student enrollment capacity or increase the number of staff at District administrative facilities. However, they could involve reconfiguring site access (driveways, pickup and drop-off locations, etc.), which could alter traffic patterns by changing the preferred routes to and from the site. In order to generate a significant traffic noise impact, a project would have to cause a traffic noise increase of 3 dB CNEL or more that would result in a noise level greater than 65 dB CNEL at one or more offsite residences. Based on the lack of available site-specific traffic data, it is not possible to predict the future traffic noise levels that would occur on streets around any individual project site. However, based on standard decibel addition, a 3 dB traffic noise increase on any given roadway would require a doubling of daily traffic volumes. Therefore, as noted in the Program-Level Analysis, above, it follows that the traffic noise impact of a project that does not double the daily traffic volume on any roadway would be less than significant. Given the lack of overall expansion proposed under the near-term whole site modernization projects, it is likely that most of the associated traffic noise impacts would be less than significant. Nonetheless, the possibility exists that one or more of the near-term projects could cause a traffic noise increase of 3 dB CNEL or more that would result in a noise level greater than 65 dB CNEL at an offsite residence, hospital, nursing facility, intermediate care facility, school, day care, library, hotel, motel, or park; or 70 dB CNEL at an offsite church or museum (**Impact-NOI-7**). Consequently, traffic noise impacts from near-term, site-specific whole site modernization projects would be significant.

### Operation – Onsite Noise Sources

The proposed near-term, site-specific whole site modernization projects would not increase student enrollment capacity at any campus or increase the number of staff at District administrative facilities. However, these projects may alter or reconfigure an existing campus. Because these projects would occur at existing sites with operational schools, determining the significance of any impact will primarily depend on whether the changes would increase existing noise levels by 3 dB

or more at any sensitive receptor. Assuming all other variables remain constant, a single noise source would need to be shifted approximately 25% closer to a given receiver in order to increase noise levels by 3 dB. In general, a proposed whole site modernization project would not be expected to generate significant noise impacts from onsite noise sources if it satisfies the following criteria.

1. The project would not introduce any substantial new operational noise source(s) that did not previously exist at the site without the project. Substantial new noise sources could include:
    a. Playgrounds
    b. Athletic facilities, such as new athletic fields, artificial turf fields, stadiums, and PA systems
    c. Driveways, drop-off zones, bus loading areas, and parking lots
2. The project would not add exterior lighting to extend the operation of athletic facilities into the evening or nighttime hours (i.e., after 7 p.m.) where such operations do not currently occur.
3. The project would not relocate any substantial existing noise source (parking lot, playground, mechanical equipment, etc.) more than 25% closer to a noise-sensitive receptor.
4. New mechanical equipment installed as part of the project would replace similar existing equipment at the same location and would not remove acoustical shielding between the equipment and offsite sensitive receptors.

Only whole site modernizations at high schools would involve the second criteria, and the three high schools slated for near-term, site-specific whole site modernization projects (Clairemont High, Madison High, and Kearny High), already include modernized athletic field lighting. Therefore, the near-term, site-specific whole site modernization projects would meet criterion 2. However, projects that do not satisfy the remaining criteria (i.e., those that add or substantially relocate noise sources) have the potential to cause a noticeable increase (3 dB or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code (**Impact-NOI-8**). Offsite noise impacts from onsite operations associated with the near-term, site-specific whole site modernization projects would be significant.

### Onsite Noise Levels

As discussed in Section 4.10.6.1, CEQA does not require an analysis of how the existing environmental conditions will affect a project's residents or users unless the project would exacerbate those conditions. Nonetheless it is noteworthy that near-term, site-specific whole site modernization projects have the potential to develop new school buildings or substantially renovate existing school buildings that would be considered noise sensitive. Such buildings would be subject to applicable mandatory noise regulations as well as any voluntary guidelines applied by the District, which would occur independently of CEQA. Such regulations and guidelines could include CCR Title 5, CCR Title 24 Part 11, CHPS criteria, and ANSI standards. These regulations and guidelines may be updated or superseded in the future, and individual projects would be subject to whichever criteria are applicable at the time of site-specific development. Future compliance with these applicable regulations and guidelines would ensure adequate noise control for new school buildings on a project-by-project basis.

## Level of Significance Prior to Mitigation

### Construction

**Impact-NOI-5: Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of Whole Site Modernization Projects.** Noise levels due to various construction activities (phases) associated with whole site modernization projects could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at residences or other offsite noise-sensitive receptors. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact.

**Impact-NOI-6: Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to Whole Site Modernization Projects.** Noise levels due to various construction activities (phases) associated with whole site modernization projects could exceed 75 A-weighted decibels (dBA) 12-hour equivalent sound level ($L_{eq}$) at onsite learning spaces (classrooms, libraries, etc.) while occupied by students for academic purposes. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13 of occupied onsite learning spaces. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.) This is a potentially significant impact.

### Operation – Traffic

**Impact-NOI-7: Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips or Altered Traffic Patterns.** Increased vehicle trips on local roadways could be generated by new facilities, expanded use of existing facilities, or redirection of traffic patterns due to reconfiguration of site access and layout. These changes have the potential to cause a traffic noise increase of 3 decibels (dB) Community Noise Equivalent Level (CNEL) or more that would result in a noise level greater than 65 dB CNEL at an offsite residence, hospital, nursing facility, intermediate care facility, school, day care, library, hotel, motel, or park, or 70 dB CNEL at an offsite church or museum. This is a potentially significant impact.

### Operation – Onsite Noise Sources

**Impact-NOI-8: Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code During Operation of an Existing District Facility.** Operation of expanded or reconfigured operations at existing facilities have the potential to cause a noticeable increase (3 decibels or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code. This is a potentially significant impact.

## Mitigation Measures

For **Impact-NOI-5**:

Implement **MM-NOI-1** through **MM-NOI-6**, as described above.

For **Impact-NOI-6**:

Implement **MM-NOI-1** and **MM-NOI-3** through **MM-NOI-7**, as described above.

For **Impact-NOI-7**:

Implement **MM-NOI-13** and **MM-NOI-14**, as described above.

For **Impact-NOI-8**:

Implement **MM-NOI- 10**, **MM-NOI-11,** and **MM-NOI-12**, as described above.

## Level of Significance After Mitigation

### Construction

Implementation of **MM-NOI-1** through **MM-NOI-6** would reduce **Impact-NOI-5**. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to neighboring noise-sensitive land uses or the inability to construct efficient temporary noise barriers due to local terrain conditions, or engineering, constructability, or safety considerations. As a result, construction noise impacts associated with near-term, site-specific whole site modernization projects would remain significant and unavoidable.

Implementation of **MM-NOI-1** and **MM-NOI-3** through **MM-NOI-7** would reduce **Impact-NOI-6**. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to occupied onsite learning spaces, the inability to construct efficient temporary noise barriers, or limited options for relocating students away from construction zones. As a result, construction noise impacts associated with near-term, site-specific whole site modernization projects would remain significant and unavoidable.

### Operation – Traffic

Implementation of **MM-NOI-13** and **MM-NOI-14** would reduce **Impact-NOI-7**. However, with limited routes to and from existing District sites, it may not be possible to fully implement these measures and avoid traffic noise impacts at all nearby sensitive receptors. As a result, traffic noise impacts associated with the operations of near-term, site-specific whole site modernization projects would remain significant and unavoidable.

### Operation – Onsite Noise Sources

Implementation of **MM-NOI-10**, through **MM-NOI-12** would reduce **Impact-NOI-8**. It is anticipated that **MM-NOI-11** will be fully implemented and will reduce noise mechanical equipment to less-than-significant levels. However, it may not be possible to fully implement **MM-NOI-12** for all onsite noise sources. Limitations may include the inability to locate these sources at sufficient distances from neighboring noise-sensitive land uses or the inability to construct effective noise barriers due to factors such as aesthetics, safety/security, or cost. In the case of major athletic facilities the source noise level may simply be too high during large events to fully mitigate at nearby receptors. As

a result, offsite noise impacts due to onsite operations associated with near-term, site-specific whole site modernization projects would remain significant and unavoidable.

## *Threshold 2: Would the Proposed Program generate excessive groundborne vibration or groundborne noise levels?*

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities, and Whole Site Modernization

#### Impact Discussion

##### *Construction*

The potential for significant vibration impacts would depend on the type of construction equipment used and the proximity of the work to sensitive receptors. As described in Section 4.10.3.5, *Vibration-Sensitive Land Uses*, all buildings (regardless of land use) are considered sensitive with respect to potential damage effects. Buildings that would be sensitive with respect to human annoyance impacts include offsite residential uses, hospitals, nursing facilities, intermediate care facilities, child educational facilities, libraries, museums, and child care facilities, as well as onsite learning spaces (classrooms, libraries, etc.) when occupied by students for academic purposes.

*Potential Building Damage*

Using the methodology described in Section 4.10.6.2, the distances for potential vibration damage impacts at various receiver building categories were calculated for a range of construction equipment. The results are summarized in Table 4.10-16. These can be considered screening distances, beyond which a given construction activity would not be expected to generate significant groundborne vibration with respect to potential building damage. While all receiver building categories were included in the analysis, it is noted the likelihood of finding the most sensitive building categories ("Extremely Fragile Historic Buildings, Ruins, Ancient Monuments" and "Fragile Buildings") is considered very low. Any project category that employs any of the construction equipment types included in the table has the potential to generate groundborne vibration impacts if the activity occurs within the specified distances. The discussion that follows the table provides a brief overview of the types of vibration-generating construction activity reasonably expected for each project category.

Out of all the project categories, new school or administrative facilities and whole site modernization projects would require the most extensive construction activities, and could include substantial demolition of existing structures and facilities. In addition, because of the potential need to construct or replace multi-story buildings, there is the possibility that pile driving may be required to support structural foundations. As a result, these project categories could potentially use any of the equipment types listed in Table 4.10-16. This corresponds to potential impact distances ranging from 1 to 168 feet. Because the exact building categories at adjacent properties and their distances from future construction work are not known at this time it is possible that construction related to the New Acquisition and New School or Administrative Facilities, and Whole Site Modernization project categories would exceed the applicable thresholds for potential building damage (**Impact-NOI-13**). The impact would be significant.

Implementation of **MM-NOI-16** would be required, which would ensure that construction activities from new school or administrative facilities and whole site modernization projects would avoid building damage due to vibration by requiring that appropriate distances are maintained between buildings and vibration-generating construction equipment and/or implementation of recommendations from a qualified engineer and construction monitoring to protect nearby buildings. This mitigation measure would reduce **Impact-NOI-13** to less than significant.

*Potential Human Annoyance*

Using the methodology described in Section 4.10.6.2, the distances at which various levels of human vibration perception are expected were calculated for a range of construction equipment. The results are summarized in Table 4.10-17. While exact vibration sensitivity varies by individual, the "distinctly perceptible" criterion of 0.04 in/s PPV is selected as the threshold of impact. For many construction scenarios that could occur under the Proposed Program, higher levels may be tolerable for several reasons. For instance, the duration of perceptible vibration may be very brief or vibration could occur at times when residents are out of their homes or engaged in activities that are not particularly sensitive to vibration. Nonetheless, the criterion of 0.04 in/s PPV is applied uniformly to assess impacts at any affected offsite or onsite sensitive receptor. The distances at which a vibration level of 0.04 in/s PPV is achieved can be considered screening distances, beyond which a given construction activity would not be expected to generate significant groundborne vibration with respect to potential human annoyance. Any project category that employs any of the construction equipment types included in Table 4.10-17 has the potential to generate groundborne vibration impacts if the activity occurs within the specified distances for a PPV of 0.04 in/s. The following discussion provides a brief overview of the types of vibration generating construction activity that are reasonably expected for each project category.

As discussed for building damage, new school or administrative facilities and whole site modernization projects would require extensive construction activities, including demolition of existing structures and facilities. They may also require pile driving to support structural foundations. As a result, these project categories could potentially use any of the equipment types listed in Table 4.10-17. This corresponds to potential impact distances ranging from 3 to 316 feet. Because the exact distances from future construction work to any nearby sensitive receptors are currently not known it is possible that construction related to the new school or administrative facilities and whole site modernization projects would exceed the 0.4 in/s threshold for human annoyance (**Impact-NOI-14** and **Impact-NOI-15**). The impacts would be significant.

Implementation of **MM-NOI-17** and **MM-NOI-18** would be required. However, it may not be possible to fully implement these measures and reduce groundborne vibration to less than 0.04 in/sec PPV at all nearby sensitive receptors or onsite learning spaces. It is noted that any residual impacts would likely be quite brief at any single receptor because distinctly perceptible vibration would only occur for the periods when heavy equipment is operating close to an individual building. In addition, the vibration would only occur during the permitted daytime construction hours when people are active and generally less sensitive to annoyance from groundborne vibration. Nonetheless, vibration could exceed the established threshold for potential annoyance, and **Impact-NOI-14** and **Impact-NOI-15** would remain significant and unavoidable.

***Operation***

The discussion of operational vibration and the resulting significance determination is essentially identical for all the project categories considered. Once construction is complete, there would be no

substantial sources of groundborne vibration associated with the Proposed Program. Typical sources of significant vibration levels include high intensity construction techniques (pile driving, blasting), heavy earthmoving operations (grading, compacting), steel-wheeled trains, and heavy industrial machinery. None of the considered project categories would include these types of sources as part of their operations. Smaller mechanical equipment, such as HVAC units and fans, could produce some perceptible vibration within the buildings at which they are installed, but such equipment would not be large enough to generate noticeable groundborne vibration at offsite locations. Operational impacts of the Proposed Program related to groundborne vibration would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-NOI-13: Exceed Caltrans Guideline Criteria for Potential Building Damage During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential building damage. The actual impacts, if any, would depend on the equipment used and the distance to the affected structure(s). Specifically, a significant impact would occur if project construction occurs within one or more of the threshold distances identified in Table 4.10-16 based on the actual construction equipment to be used. This is a potentially significant impact.

**Impact-NOI-14: Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Offsite Sensitive Receptors During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential human annoyance. The actual impacts, if any, would depend on the equipment used and the distance to the affected sensitive buildings. Specifically, a significant impact would occur if project construction occurs within the "distinctly perceptible" threshold distance of an occupied sensitive building, as identified in Table 4.10-17 based on the actual construction equipment to be used. This is a potentially significant impact.

**Impact-NOI-15: Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Occupied Onsite Learning Spaces During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential human annoyance. The actual impacts, if any, would depend on the equipment used and the distance to the affected sensitive buildings. Specifically, a significant impact would occur if project construction occurs within the "distinctly perceptible" threshold distance of an occupied sensitive building, as identified in Table 4.10-17 based on the actual construction equipment to be used. This is a potentially significant impact.

#### *Operation*

Operation of new school and administrative facilities and whole site modernization projects would not generate excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant.

### Mitigation Measures

For **Impact-NOI-13:**

> **MM-NOI-16**: **Avoid or Reduce Potentially Damaging Vibration at Nearby Buildings from Program Construction.** During construction activities, the District shall require all contractors,

to avoid working within the potential damage threshold distances identified in Table 4.10-16 based on the construction equipment to be used and the type and condition of nearby structures. The contractor may reduce the potential impact distance through the selection of alternate construction equipment or techniques such as, but not limited to, the following.

- Replacing impact pile driving with press-in piles or drilled piles (e.g., cast-in-drilled-hole, poured-in-place piles).
- Using smaller categories of equipment, such as a Bobcat or skid steer instead of full size graders or bulldozers.

If these techniques cannot be fully implemented or are not sufficient to place the affected receivers outside of the applicable threshold distance, then the following additional steps shall be taken to protect buildings within the potential impact distances for construction vibration damage:

- The project proponent/contractor shall retain a qualified structural or geotechnical engineer to conduct preconstruction surveys of neighboring structures (including photographing and/or videotaping) to document existing building conditions for future comparison if any vibration-related damage is suspected or results from construction-related activities.
- Based on professional judgment and review of the specific buildings involved, the structural/geotechnical engineer may provide updated vibration thresholds and revised impact distances for potentially affected buildings.
- If considered appropriate by the structural/geotechnical engineer, monitoring shall be conducted during construction to check for vibration-related damage during pile driving. Such monitoring may include vibration measurements obtained inside or outside of the buildings or other tests and observations deemed necessary.

For **Impact-NOI-14**:

**MM-NOI-17**: **Avoid or Reduce Potentially Annoying Vibration at Occupied Sensitive Offsite Buildings During Project Construction.** During construction activities, the District shall require all contractors to avoid working within the distinctly perceptible threshold distances identified in Table 4.10-17 from occupied sensitive offsite buildings, based on the construction equipment to be used. The contractor may reduce the potential impact distance through the selection of alternate construction equipment or techniques such as, but not limited to, the following.

- Replacing impact pile driving with press-in piles or drilled piles (e.g., cast-in-drilled-hole, poured-in-place piles).
- Using smaller categories of equipment, such as a Bobcat or skid steer instead of full size graders or bulldozers.

For **Impact-NOI-15:**

**MM-NOI-18: Avoid or Reduce Potentially Annoying Vibration at Occupied Onsite Learning Spaces During Program Construction.** During construction of the project, the District shall coordinate with all contractors to avoid excessive groundborne vibration at sensitive onsite buildings. Such coordination may include, but is not limited to, the following.

- Identifying days and times when school buildings would be used for sensitive learning activities and avoiding the operation of heavy construction equipment within the threshold distances identified in Table 4.10-17.
- Relocating sensitive learning activities to alternative classrooms or other spaces away from heavy construction activities.
- Shortening the construction work day and/or altering start and stop times to avoid particularly sensitive time periods such as student testing and exams.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-NOI-16** would reduce **Impact-NOI-13** to less than significant.

Implementation of **MM-NOI-17** would reduce **Impact-NOI-14**. However, it may not be possible to fully implement this measure and reduce groundborne vibration to less than 0.04 in/sec PPV at all nearby sensitive receptors. It is noted that any residual impacts would likely be quite brief at any single receptor because distinctly perceptible vibration would only occur for the periods when heavy equipment is operating close to an individual building. In addition, the vibration would only occur during the permitted daytime construction hours when people are active and generally less sensitive to annoyance from groundborne vibration. Nonetheless, vibration could exceed the established threshold for potential annoyance, and impacts associated with construction of new school or administrative facilities and whole site modernization projects would remain significant and unavoidable.

Implementation of **MM-NOI-18** would reduce **Impact-NOI-15**. However, it may not be possible to fully implement the measure and reduce groundborne vibration to less than 0.04 in/sec PPV at all onsite learning spaces. It is noted that any residual impacts would likely be quite brief at any single receptor because distinctly perceptible vibration would only occur for the periods when heavy equipment is operating close to an individual building. Nonetheless, vibration could exceed the established threshold for potential annoyance, and impacts associated with construction of new school or administrative facilities and whole site modernization projects would remain significant and unavoidable.

#### *Operation*

Impacts were determined to be less than significant prior to mitigation. No mitigation is required. The impact with respect to groundborne vibration from Program operation will be less than significant.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

*Potential Building Damage*

This project category would not require pile driving. However, it is possible that it could use any of the other equipment types listed in Table 4.10-16. This corresponds to potential impact distances

ranging from 1 to 68 feet. Because the exact building categories at adjacent properties and their distances from future construction work are currently not known it is possible that construction related to the Upgrades of Existing School and Administrative Sites project category would exceed the applicable thresholds for potential building damage (**Impact-NOI-13**). The impact would be significant.

Implementation of **MM-NOI-16** would be required, which would ensure that construction activities from upgrades of existing school and administrative sites would avoid building damage due to vibration by requiring that appropriate distances are maintained between buildings and vibration-generating construction equipment and/or implementation of recommendations from a qualified engineer and construction monitoring to protect nearby buildings. This mitigation measure would reduce **Impact-NOI-13** to less than significant.

*Potential Human Annoyance*

Upgrades of existing school and administrative sites would not require pile driving. However, it is possible that projects could use any of the other equipment types listed in Table 4.10-17. This corresponds to potential impact distances ranging from 3 to 128 feet. Because the exact distances from future construction work to any nearby sensitive receptors are currently not known, it is possible that construction related to upgrades of existing school and administrative sites would exceed the 0.4 in/s threshold for human annoyance (**Impact-NOI-15**). The impacts would be significant.

Implementation of **MM-NOI-17** and **MM-NOI-18** would be required. However, it may not be possible to fully implement these measures and reduce groundborne vibration to less than 0.04 in/sec PPV at all nearby sensitive receptors or onsite learning spaces. It is noted that any residual impacts would likely be quite brief at any single receptor because distinctly perceptible vibration would only occur for the periods when heavy equipment is operating close to an individual building. In addition, the vibration would only occur during the permitted daytime construction hours when people are active and generally less sensitive to annoyance from groundborne vibration. Nonetheless, vibration could exceed the established threshold for potential annoyance, and **Impact-NOI-14** and **Impact-NOI-15** would remain significant and unavoidable.

***Operation***

The discussion of operational vibration and the resulting significance determination is essentially identical for all the project categories considered. Once construction is complete, there would be no substantial sources of groundborne vibration associated with the Proposed Program. Typical sources of significant vibration levels include high intensity construction techniques (pile driving, blasting), heavy earthmoving operations (grading, compacting), steel-wheeled trains, and heavy industrial machinery. None of the considered project categories would include these types of sources as part of their operations. Smaller mechanical equipment, such as HVAC units and fans, could produce some perceptible vibration within the buildings at which they are installed, but such equipment would not be large enough to generate noticeable groundborne vibration at offsite locations. Operational impacts of the Proposed Program related to groundborne vibration would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-NOI-13: Exceed Caltrans Guideline Criteria for Potential Building Damage During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential building damage. The actual impacts, if any, would depend on the equipment used and the distance to the affected structure(s). Specifically, a significant impact would occur if project construction occurs within one or more of the threshold distances identified in Table 4.10-16 based on the actual construction equipment to be used. This is a potentially significant impact.

**Impact-NOI-14: Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Offsite Sensitive Receptors During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential human annoyance. The actual impacts, if any, would depend on the equipment used and the distance to the affected sensitive buildings. Specifically, a significant impact would occur if project construction occurs within the "distinctly perceptible" threshold distance of an occupied sensitive building, as identified in Table 4.10-17 based on the actual construction equipment to be used. This is a potentially significant impact.

**Impact-NOI-15: Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Occupied Onsite Learning Spaces During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential human annoyance. The actual impacts, if any, would depend on the equipment used and the distance to the affected sensitive buildings. Specifically, a significant impact would occur if project construction occurs within the "distinctly perceptible" threshold distance of an occupied sensitive building, as identified in Table 4.10-17 based on the actual construction equipment to be used. This is a potentially significant impact.

#### *Operation*

Operation activities associated with upgrades of existing school and administrative sites would not generate excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant.

### Mitigation Measures

For **Impact-NOI-13**:

Implement **MM-NOI-16**, as described above.

For **Impact-NOI-14**:

Implement **MM-NOI-17**, as described above.

For **Impact-NOI-15**:

Implement **MM-NOI-18**, as described above.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-NOI-16** would reduce **Impact-NOI-13** to less than significant.

Implementation of **MM-NOI-17** would reduce **Impact-NOI-14**. However, it may not be possible to fully implement this measure and reduce groundborne vibration to less than 0.04 in/sec PPV at all nearby sensitive receptors. It is noted that any residual impacts would likely be quite brief at any single receptor because distinctly perceptible vibration would only occur for the periods when heavy equipment is operating close to an individual building. In addition, the vibration would only occur during the permitted daytime construction hours when people are active and generally less sensitive to annoyance from groundborne vibration. Nonetheless, vibration could exceed the established threshold for potential annoyance, and impacts from construction associated with upgrades of existing school and administrative sites would remain significant and unavoidable.

Implementation of **MM-NOI-18** would reduce **Impact-NOI-15**. However, it may not be possible to fully implement the measure and reduce groundborne vibration to less than 0.04 in/sec PPV at all onsite learning spaces. It is noted that any residual impacts would likely be quite brief at any single receptor because distinctly perceptible vibration would only occur for the periods when heavy equipment is operating close to an individual building. Nonetheless, vibration could exceed the established threshold for potential annoyance, and impacts from construction associated with upgrades of existing school and administrative sites would remain significant and unavoidable.

#### *Operation*

Impacts were determined to be less than significant prior to mitigation. No mitigation is required. The impact with respect to groundborne vibration from Program operation will be less than significant.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

#### *Construction*

*Potential Building Damage*

This project category would not require pile driving. Because the existing fields are decomposed granite, the use of a hydraulic breaker should not be required for demolition. However, grading, earthmoving, and compacting would likely be required so it is possible that this project category could use any of the remaining equipment types listed in Table 4.10-16. This corresponds to potential impact distances ranging from 1 to 61 feet. Because the exact building categories at adjacent properties and their distances from future construction work are currently not known it is possible that construction related to the Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project category would exceed the applicable thresholds for potential building damage (**Impact-NOI-13**). The impact would be significant.

**Table 4.10-16. Impact Distances for Potential Vibration Damage from Program Construction**

| Equipment Item | Building Category: | Extremely Fragile Historic Buildings, Ruins, Ancient Monuments | Fragile Buildings | Historic Buildings | Older Residential Structures | New Residential Structures | Modern Industrial/ Commercial Buildings |
|---|---|---|---|---|---|---|---|
| | **Vibration Damage Impact Criteria, PPV (in/s)[1]** | 0.08 | 0.1 | 0.25 | 0.3 | 0.5 | 0.5 |
| Pile driver (impact or vibratory) | Distance to Impact Criteria (feet) | 168 | 138 | 60 | 51 | 32 | 32 |
| Hydraulic breaker[2] | | 68 | 56 | 25 | 21 | 13 | 13 |
| Vibratory roller | | 61 | 50 | 22 | 19 | 12 | 12 |
| Large bulldozer[3] | | 28 | 23 | 10 | 9 | 6 | 6 |
| Drilling[4] | | 28 | 23 | 10 | 9 | 6 | 6 |
| Jackhammer | | 12 | 10 | 5 | 4 | 3 | 3 |
| Small bulldozer[5] | | 2 | 2 | 1 | 1 | 1 | 1 |

Source: Appendix I.

[1] All criteria are based on the values for continuous/frequent intermittent sources (all of the anticipated sources fall into this category).

[2] Also commonly referred to as a hoe ram.

[3] Considered representative of other heavy earthmoving equipment such as excavators, graders, backhoes, etc.

[4] Based on caisson drilling.

[5] Considered representative of other smaller earthmoving equipment such as a Bobcat®, skid steer, etc.

*Potential Human Annoyance*

Joint-use facilities would not require pile driving. Because the existing fields are decomposed granite, the use of a hydraulic breaker should not be required for demolition. However, grading, earthmoving, and compacting would likely be required so it is possible that this project category could use any of the remaining equipment types listed in Table 4.10-17. This corresponds to potential impact distances ranging from 1 to 61 feet. Because the exact distances from future construction work to any nearby sensitive receptors are currently not known it is possible that construction related to the Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project category would exceed the 0.4 in/s threshold for human annoyance (**Impact-NOI-14** and **Impact-NOI-15**). The impacts would be significant.

***Operation***

The discussion of operational vibration and the resulting significance determination is essentially identical for all the project categories considered. Once construction is complete, there would be no substantial sources of groundborne vibration associated with the Proposed Program. Typical sources of significant vibration levels include high intensity construction techniques (pile driving, blasting), heavy earthmoving operations (grading, compacting), steel-wheeled trains, and heavy industrial machinery. None of the considered project categories would include these types of sources as part of their operations. Smaller mechanical equipment, such as HVAC units and fans, could produce some perceptible vibration within the buildings at which they are installed, but such equipment would not be large enough to generate noticeable groundborne vibration at offsite locations. Operational impacts of the Proposed Program related to groundborne vibration would be less than significant.

**Table 4.10-17. Distances to Potential Human Effects from Program Construction Vibration**

| Equipment Item | Human Perceptibility: | Barely Perceptible[2] | Distinctly Perceptible (Threshold of Impact) | Strongly Perceptible[2] | Severe[2] |
|---|---|---|---|---|---|
| | **Vibration Perception Criteria, PPV (in/s)[1]** | 0.01 | **0.04** | 0.1 | 0.4 |
| Pile driver (impact or vibratory) | Distance to Impact Criteria (feet) | 1,112 | **316** | 138 | 39 |
| Hydraulic breaker[3] | | 450 | **128** | 56 | 16 |
| Vibratory roller | | 399 | **113** | 50 | 14 |
| Large bulldozer[4] | | 183 | **52** | 23 | 7 |
| Drilling[5] | | 183 | **52** | 23 | 7 |
| Jackhammer | | 79 | **23** | 10 | 3 |
| Small bulldozer[6] | | 9 | **3** | 2 | 1 |

Source: Appendix I.

[1] All criteria are based on the values for continuous/frequent intermittent sources (all of the anticipated sources fall into this category).

[2] Included for informational purposes only.

[3] Also commonly referred to as a hoe ram.

[4] Considered representative of other heavy earthmoving equipment such as excavators, graders, backhoes, etc.

[5] Based on caisson drilling.

[6] Considered representative of other smaller earthmoving equipment such as a Bobcat®, skid steer, etc.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-NOI-13: Exceed Caltrans Guideline Criteria for Potential Building Damage During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential building damage. The actual impacts, if any, would depend on the equipment used and the distance to the affected structure(s). Specifically, a significant impact would occur if project construction occurs within one or more of the threshold distances identified in Table 4.10-16 based on the actual construction equipment to be used. This is a potentially significant impact.

**Impact-NOI-14: Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Offsite Sensitive Receptors During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential human annoyance. The actual impacts, if any, would depend on the equipment used and the distance to the affected sensitive buildings. Specifically, a significant impact would occur if project construction occurs within the "distinctly perceptible" threshold distance of an occupied sensitive building, as identified in Table 4.10-17 based on the actual construction equipment to be used. This is a potentially significant impact.

**Impact-NOI-15: Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Occupied Onsite Learning Spaces During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential human annoyance. The actual impacts, if any, would depend on the equipment used and the distance to the affected sensitive buildings. Specifically, a significant impact would occur if project construction occurs within the "distinctly perceptible" threshold distance of an occupied sensitive building, as identified in Table 4.10-17 based on the actual construction equipment to be used. This is a potentially significant impact.

#### *Operation*

Operations of joint-use facilities would not generate excessive groundborne vibration or groundborne noise levels. The impact would be less than significant.

### Mitigation Measures

For **Impact-NOI-13:**

Implement **MM-NOI-16**, as described above.

For **Impact-NOI-14**:

Implement **MM-NOI-17**, as described above.

For **Impact-NOI-15:**

Implement **MM-NOI-18,** as described above.

### Level of Significance After Mitigation

#### *Construction*

Implementation of **MM-NOI-16** would reduce **Impact-NOI-13** to less than significant.

Implementation of **MM-NOI-17** would reduce **Impact-NOI-14**. However, it may not be possible to fully implement this measure and reduce groundborne vibration to less than 0.04 in/sec PPV at all nearby sensitive receptors. It is noted that any residual impacts would likely be quite brief at any single receptor because distinctly perceptible vibration would only occur for the periods when heavy equipment is operating close to an individual building. In addition, the vibration would only occur during the permitted daytime construction hours when people are active and generally less sensitive to annoyance from groundborne vibration. Nonetheless, vibration could exceed the established threshold for potential annoyance, and impacts from construction of joint-use facilities would remain significant and unavoidable.

Implementation of **MM-NOI-18** would reduce **Impact-NOI-15**. However, it may not be possible to fully implement the measure and reduce groundborne vibration to less than 0.04 in/sec PPV at all onsite learning spaces. It is noted that any residual impacts would likely be quite brief at any single receptor because distinctly perceptible vibration would only occur for the periods when heavy equipment is operating close to an individual building. Nonetheless, vibration could exceed the established threshold for potential annoyance, and impacts from construction of joint-use facilities would remain significant and unavoidable.

#### *Operation*

Impacts were determined to be less than significant prior to mitigation. No mitigation is required. The impact with respect to groundborne vibration from Program operation will be less than significant.

## Site-Specific Analysis

### Impact Discussion

#### Construction

#### *Potential Building Damage*

There are currently no specific proposed plans or details for the improvements that would occur at the 21 school sites identified for near-term, site-specific whole site modernization projects (Table 4.10-15). Consistent with the assumptions used in the Program-Level Analysis, each of the 21 schools are in proximity to buildings that could be damaged by groundborne vibration and homes and/or other sensitive buildings where people could potentially be impacted by annoyance from groundborne vibration.

The methodology, construction and operational assumptions, and general results (including screening distances) for the Whole Site Modernization project category analyzed at the program level are applicable to the site-specific cases. Any of the near-term, site-specific whole site modernization projects could include substantial demolition of existing structures and facilities. In addition, because of the potential need to construct or replace multi-story buildings, there is the possibility that pile driving may be required to support structural foundations. As a result, these

near-term projects could potentially use any of the equipment types listed in Table 4.10-16. This corresponds to potential impact distances ranging from 1 to 168 feet. Because the exact building categories at adjacent properties and their distances from future construction work are not known at this time it is possible that construction of near-term, site-specific whole site modernization projects would exceed the applicable thresholds for potential building damage (**Impact-NOI-13**). The impact would be significant.

***Potential Human Annoyance***

Using the methodology described in Section 4.10.6.2, the distances at which various levels of human vibration perception are expected were calculated for a range of construction equipment. The results are summarized in Table 4.10-17 in the Program-Level Analysis. While exact vibration sensitivity varies by individual, the "distinctly perceptible" criterion of 0.04 in/s PPV is selected as the threshold of impact. Any of the near-term, site-specific whole site modernization projects may need to construct or replace multi-story buildings; therefore, there is the possibility that pile driving may be required to support structural foundations. As a result, these projects could potentially use any of the equipment types listed in Table 4.10-17. This corresponds to potential impact distances ranging from 3 to 316 feet. Because the exact distances from future construction work to any nearby sensitive receptors are currently not known it is possible that construction related to the near-term, site-specific whole site modernization projects would exceed the 0.4 in/s threshold for human annoyance (**Impact-NOI-14** and **Impact-NOI-15**). The impacts would be potentially significant.

### Operation

Once construction of the near-term, site-specific whole site modernization projects is complete, there would be no substantial sources of groundborne vibration associated with operational activities. Smaller mechanical equipment, such as HVAC units and fans, could produce some perceptible vibration within the buildings at which they are installed, but such equipment would not be large enough to generate noticeable groundborne vibration at offsite locations. Operational impacts related to groundborne vibration from near-term, site-specific whole site modernization projects would be less than significant.

## Level of Significance Prior to Mitigation

### Construction

**Impact-NOI-13: Exceed Caltrans Guideline Criteria for Potential Building Damage During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential building damage. The actual impacts, if any, would depend on the equipment used and the distance to the affected structure(s). Specifically, a significant impact would occur if project construction occurs within one or more of the threshold distances identified in Table 4.10-16 based on the actual construction equipment to be used. This is a potentially significant impact.

**Impact-NOI-14: Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Offsite Sensitive Receptors during Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential human annoyance. The actual impacts, if any, would depend on the equipment used and the distance to the affected sensitive buildings. Specifically, a significant impact would occur if project construction occurs within the "distinctly

perceptible" threshold distance of an occupied sensitive building, as identified in Table 4.10-17 based on the actual construction equipment to be used. This is a potentially significant impact.

**Impact-NOI-15: Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Occupied Onsite Learning Spaces During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential human annoyance. The actual impacts, if any, would depend on the equipment used and the distance to the affected sensitive buildings. Specifically, a significant impact would occur if project construction occurs within the "distinctly perceptible" threshold distance of an occupied sensitive building, as identified in Table 4.10-17 based on the actual construction equipment to be used. This is a potentially significant impact.

#### Operation

Mechanical equipment used during operation of the near-term, site-specific whole site modernization projects, such as HVAC units and fans, could produce some perceptible vibration within the buildings at which they are installed, but such equipment would not be large enough to generate noticeable groundborne vibration at offsite locations. Operational impacts related to groundborne vibration would be less than significant.

## Mitigation Measures

For **Impact-NOI-13**:

Implement **MM-NOI-16**, as described above.

For **Impact-NOI-14**:

Implement **MM-NOI-17**, as described above.

For **Impact-NOI-15**:

Implement **MM-NOI-18**, as described above.

## Level of Significance After Mitigation

#### Construction

Implementation of **MM-NOI-16** would reduce **Impact-NOI-13** to less than significant.

Implementation of **MM-NOI-17** would reduce **Impact-NOI-14**. However, it may not be possible to fully implement this measure and reduce groundborne vibration to less than 0.04 in/sec PPV at all nearby sensitive receptors. It is noted that any residual impacts would likely be quite brief at any single receptor because distinctly perceptible vibration would only occur for the periods when heavy equipment is operating close to an individual building. In addition, the vibration would only occur during the permitted daytime construction hours when people are active and generally less sensitive to annoyance from groundborne vibration. Nonetheless, vibration could exceed the established threshold for potential annoyance, and impacts from construction of near-term, site-specific whole site modernization projects would remain significant and unavoidable.

Implementation of **MM-NOI-18** would reduce **Impact-NOI-15**. However, it may not be possible to fully implement these measures and reduce groundborne vibration to less than 0.04 in/sec PPV at all onsite learning spaces. It is noted that any residual impacts would likely be quite brief at any

single receptor because distinctly perceptible vibration would only occur for the periods when heavy equipment is operating close to an individual building. Nonetheless, vibration could exceed the established threshold for potential annoyance, and impacts from construction of near-term, site-specific whole site modernization projects would remain significant and unavoidable.

#### Operation

Impacts were determined to be less than significant prior to mitigation. No mitigation is required. The impact with respect to groundborne vibration from operation of near-term, site-specific whole site modernization projects will be less than significant.

***Threshold 3: Would the Proposed Program be 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 and expose people residing or working in the Program area to excessive noise levels?***

## Program-Level and Site-Specific Analysis

### All Project Categories and Site-Specific Analysis

#### Impact Discussion

As discussed in Section 4.10.6.1, CEQA does not require an analysis of how the existing environmental conditions will affect a project's residents or users unless the project would exacerbate those conditions. None of the project categories would affect operations at any of the region's airports or airstrips, and operational variables (e.g., the number or timing of takeoffs and landings, type of aircraft, flight paths) would not change due to implementation of the Proposed Program or near-term, site-specific whole site modernization projects at the 21 identified sites. Therefore, the Proposed Program would not exacerbate any existing airport-related noise conditions, and there would be no impact. Nonetheless, a discussion of aircraft-related noise levels is provided below for informational purposes.

##### *Onsite Noise Levels*

As discussed in Section 4.10.6.1, new or substantially renovated school buildings would be subject to applicable mandatory noise regulations as well as any voluntary guidelines applied by the District, which would apply independently of CEQA. Such regulations and guidelines could include CCR Title 5, CCR Title 24 Part 11, CHPS criteria, and ANSI Standards. These regulations and guidelines may be updated or superseded over the course of the Proposed Program, and individual projects would be subject to whichever criteria are applicable at the time of site-specific development. Future compliance with these applicable regulations and guidelines would ensure adequate noise control for new school buildings on a project-by-project basis.

There are 16 public-use or military airports in the San Diego region. A review of the airport noise contours and existing District school sites indicates that 41 schools are currently exposed to aircraft noise levels of 60 dB CNEL or more, with the most sites affected by San Diego International Airport (SDIA) (Lindbergh Field) and the remainder affected by Marine Corps Air Station (MCAS) Miramar or Montgomery Field. Table 4.10-18 lists the affected schools by geographical cluster. The table also identifies the associated airport and the noise contour within which each school is located. Noise

contours are provided in 5 dB increments. It is noted that typical guidelines, including those in the Noise Element of the City of San Diego General Plan and SDIA Airport Land Use Compatibility Plan, identify that K-12 schools are conditionally compatible with noise levels up to 65 dB CNEL and incompatible with noise levels over 65 dB CNEL.

**Table 4.10-18. School Sites and District Facilities Affected by Airport Noise Levels of 60 dB CNEL or Greater**

| School Site or District Facilities[1] | Airport(s) | Airport Noise Contour (dB CNEL) |
|---|---|---|
| **Lincoln Cluster** | | |
| Chollas/Mead Elementary | SDIA (Lindbergh Field) | 60 |
| Horton Elementary | SDIA (Lindbergh Field) | 60 |
| Ingenuity Charter | SDIA (Lindbergh Field) | 60 |
| Lincoln High | SDIA (Lindbergh Field) | 60 |
| The O'Farrell Charter | SDIA (Lindbergh Field) | 60 |
| Valencia Park Elementary | SDIA (Lindbergh Field) | 60 |
| **Madison Cluster** | | |
| Creative, Performing, and Media Arts | MCAS Miramar | 60 |
| Hawthorne Elementary | MCAS Miramar | 60 |
| Innovation Middle | MCAS Miramar | 60 |
| Lafayette Elementary | Montgomery Field | 60 |
| Madison High | MCAS Miramar and Montgomery Field | 60 |
| **Morse Cluster** | | |
| Morse High | SDIA (Lindbergh Field) | 60 |
| **Point Loma Cluster** | | |
| Correia Middle | SDIA (Lindbergh Field) | 65 |
| Dana Middle | SDIA (Lindbergh Field) | 60 |
| Dewey Elementary | SDIA (Lindbergh Field) | 65 |
| Explorer Elementary | SDIA (Lindbergh Field) | 65 |
| Loma Portal Elementary | SDIA (Lindbergh Field) | 70 |
| Ocean Beach Elementary | SDIA (Lindbergh Field) | 60 |
| Point Loma High | SDIA (Lindbergh Field) | 70 |
| **San Diego Cluster** | | |
| Albert Einstein Academy Charter Middle | SDIA (Lindbergh Field) | 65 |
| Einstein Academy | SDIA (Lindbergh Field) | 65 |
| Garfield High | SDIA (Lindbergh Field) | 60 |
| Golden Hill K-8 | SDIA (Lindbergh Field) | 65 |
| San Diego Business | SDIA (Lindbergh Field) | 70 |
| San Diego Early/Middle College | SDIA (Lindbergh Field) | 60 |
| San Diego International Studies | SDIA (Lindbergh Field) | 70 |
| San Diego Science and Technology | SDIA (Lindbergh Field) | 70 |
| Washington Elementary | SDIA (Lindbergh Field) | 60 |

| School Site or District Facilities[1] | Airport(s) | Airport Noise Contour (dB CNEL) |
|---|---|---|
| **Scripps Ranch Cluster** | | |
| Marshall Middle | MCAS Miramar | 60 |
| Scripps Ranch High | MCAS Miramar | 60 |
| **University City Cluster** | | |
| University City High | MCAS Miramar | 60 |

[1] Only includes schools located on District property

### Level of Significance Prior to Mitigation

The Proposed Program would not exacerbate any existing airport-related noise conditions, and there would be no impact.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

The Proposed Program would not exacerbate any existing airport-related noise conditions, and there would be no impact.

# Section 4.11
# Paleontological Resources

## 4.11.1 Overview

This section describes the existing conditions and applicable laws and regulations for paleontological resources, followed by an analysis of the potential impacts on paleontological resources that could result from future capital improvement projects associated with the Proposed Program. For the purposes of this EIR, potential impacts on paleontological resources would be significant if the Proposed Program would directly or indirectly destroy a unique paleontological resource or site.[1]

Table 4.11-1 summarizes the significant impacts and mitigation measures (MMs) discussed in Section 4.11.4.3, *Impacts and Mitigation Measures*.

**Table 4.11-1. Summary of Significant Paleontological Resources Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact-PAL-1:** Potential to Disturb Buried Paleontological Resources During New Acquisition and New School or Administrative Facilities Projects. | **MM-PAL-1:** Conduct Grading and Paleontological Sensitivity Screening.<br>**MM-PAL-2:** Conduct Paleontological Monitoring in Areas of High or Moderate Sensitivity. | Less than Significant | Future projects would be required to screen for grading quantities and paleontological sensitivity, and the recommended monitoring of any ground-disturbing activities that extend 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site. |
| **Whole Site Modernization** | | | |
| **Impact-PAL-2:** Potential to Disturb Buried Paleontological Resources During Construction of Whole Site Modernization and Joint-Use Facilities Development Projects. | **MM-PAL-1:** Conduct Grading and Paleontological Sensitivity Screening.<br>**MM-PAL-2:** Conduct Paleontological Monitoring in Areas of | Less than Significant | Future projects would be required to screen for grading quantities and paleontological sensitivity, and the recommended monitoring of any |

[1] There are no unique geologic resources identified within the City of San Diego (County of San Diego 2007). Therefore, this section only analyzes impacts on paleontological resources.

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | High or Moderate Sensitivity. | | ground-disturbing activities that extend 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site. |
| **Impact-PAL-3:** Potential to Disturb Fossil Collection Localities During Construction. | **MM-PAL-1:** Conduct Grading and Paleontological Sensitivity Screening.<br>**MM-PAL-2:** Conduct Paleontological Monitoring in Areas of High or Moderate Sensitivity. | Less than Significant | Future projects would be required to screen for grading quantities and paleontological sensitivity, and the recommended monitoring of any ground-disturbing activities that extend 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site. |
| **Upgrades of Existing School and Administrative Sites** | | | |
| **Impact-PAL-3:** Potential to Disturb Fossil Collection Localities During Construction. | **MM-PAL-2:** Conduct Paleontological Monitoring in Areas of High or Moderate Sensitivity. | Less than Significant | Future projects would be required to conduct monitoring of any ground-disturbing activities in areas of high or moderate sensitivity. This would minimize the potential to affect a unique paleontological resource or site. |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| **Impact-PAL-2:** Potential to Disturb Buried Paleontological Resources During Construction of Whole Site Modernization and Joint-Use Facilities Development Projects. | **MM-PAL-1:** Conduct Grading and Paleontological Sensitivity Screening.<br>**MM-PAL-2:** Conduct Paleontological Monitoring in Areas of High or Moderate Sensitivity. | Less than Significant | Future projects would be required to screen for grading quantities and paleontological sensitivity, and the recommended monitoring of any ground-disturbing activities that extend 10 feet or more below ground surface would minimize the potential |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | to affect a unique paleontological resource or site. |
| **Impact-PAL-3:** Potential to Disturb Fossil Collection Localities During Construction. | **MM-PAL-1:** Conduct Grading and Paleontological Sensitivity Screening. **MM-PAL-2:** Conduct Paleontological Monitoring in Areas of High or Moderate Sensitivity. | Less than Significant | Future projects would be required to screen for grading quantities and paleontological sensitivity, and the recommended monitoring of any ground-disturbing activities that extend 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site. |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| **Impact-PAL-4:** Potential to Disturb Buried Paleontological Resources During Construction of Near-Term, Site-Specific Whole Site Modernization Projects. | **MM-PAL-1:** Conduct Grading and Paleontological Sensitivity Screening. **MM-PAL-2:** Conduct Paleontological Monitoring in Areas of High or Moderate Sensitivity. | Less than Significant | Future near-term, site-specific whole site modernization projects would be required to screen for grading quantities and paleontological sensitivity, and the recommended monitoring of any ground-disturbing activities that extend 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site. |
| **Impact-PAL-5:** Potential to Disturb Fossil Collection Localities During Construction of Near-Term, Site Specific Whole Site Modernization Projects. | **MM-PAL-1:** Conduct Grading and Paleontological Sensitivity Screening. **MM-PAL-2:** Conduct Paleontological Monitoring in Areas of High or Moderate Sensitivity. | Less than Significant | Future near-term, site-specific whole site modernization projects would be required to screen for grading quantities and paleontological sensitivity, and the recommended monitoring of any ground-disturbing |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | activities that extend 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site. |

# 4.11.2 Existing Conditions

## 4.11.2.1 Paleontological Background

Paleontological resources (fossils) are the remains and/or traces of prehistoric life and represent an important and nonrenewable natural resource. Fossil remains are found in the geologic units (i.e., formations) within which they were originally buried. Fossils or fossil deposits are generally regarded as older than 11,700 years, the generally accepted temporal boundary marking the end of the last late-Pleistocene glacial event and the beginning of the current period of climatic amelioration of the Holocene. For planning purposes, paleontological resources can be thought of as including not only actual fossil remains and traces, but also the localities where those fossils are collected, and the geologic units containing the localities.

Fossils can consist of body fossils that are representative of the actual organism or trace fossils that record evidence of the behavior or activity of organisms. Body fossils include, for example, impressions (internal and external molds) and shells and tests of marine invertebrates (e.g., mollusks, crustaceans, echinoderms); bones and teeth of fishes, amphibians, reptiles, birds, and mammals; and impressions of leaves and petrified wood of plants. Trace fossils (i.e., ichnofossils) include behavioral evidence such as footprints and trackways, burrows and boreholes, coprolites, nests, eggshells, and (packrat) middens. Body fossils and trace fossils are found in the sedimentary deposits and unconsolidated sediments of ancient environments such as oceans, lagoons, beaches, deltas, rivers, and lakes.

Within San Diego County, there are a number of distinct geologic units that record portions of the past 450 million years of Earth's history. In general, time periods late in geologic history are better represented than periods further back in time because the younger rocks are less likely to have been eroded away, buried, or metamorphosed. In San Diego County, the geologic record is most complete for major portions of the past 75 million years, and includes sections of sedimentary rock deposited during the Cretaceous Period; the Eocene, Oligocene, Miocene, and Pliocene epochs of the Neogene Period; and the Pleistocene Epoch of the Quaternary Period.

The District lies in the Coastal Plain Region of the Peninsular Range Geomorphic Province and is underlain by a layer cake sequence of interbedded marine and non-marine sedimentary rock units that record portions of the last 140 million years of Earth's history. Over this period of time, the relationship of land and sea has fluctuated drastically, such that today we have ancient marine deposits preserved at elevations up to 900 feet above sea level.

## 4.11.2.2 Types and Occurrence of Fossils

The fossil record preserved in the rocks of San Diego County is unique in many respects and consists of important fossils and fossil assemblages that are either poorly represented or altogether unknown in other areas of California and North America. Especially significant are the late Cretaceous, Eocene, Oligocene, Pliocene, and Pleistocene portions of the local record. Fossils of Paleozoic age are extremely rare locally, as are fossils of Triassic and Jurassic age.

The majority of San Diego County fossils are represented by shells and/or tests of marine invertebrates (e.g., corals, mollusks, crustaceans, echinoderms). However, important skeletal remains of terrestrial vertebrates (e.g., reptiles, birds, mammals) and marine vertebrates (e.g., sharks, rays, bony fishes, sea birds, fur seals, walruses, dolphins, baleen whales, sea cows) characterize certain geologic units and time intervals. The local terrestrial fossil record also consists of remains and impressions of plants including leaf assemblages and petrified wood.

Although fossil discoveries in the Coastal Plain Region have been made in natural outcrops of sedimentary strata, such as occur in sea cliffs and valley, canyon, and gully slopes, a majority of recent discoveries have been made in temporary exposures produced by grading activities for development projects. Fossils known from the Coastal Plain Region are widespread and locally abundant.

## 4.11.2.3 Existing Paleontological Resources

A paleontological records search was conducted by the San Diego Natural History Museum (SDNHM) in September 2019 that covered all existing school and administrative sites within the District's boundaries. The paleontological records search area encompassed a quarter-mile radius around each individual school and administrative site throughout the District to determine the geologic units underlying each site and to identify any recorded fossil collection localities at or in the vicinity of each site. A fossil collection locality is the combined geographic and stratigraphic context of fossils—the place on the Earth and stratum (deposited during a particular time in Earth's history) from which the fossils were collected. Localities themselves may persist for decades, in the case of a fossil-bearing outcrop that is protected from natural or human impacts, or may be temporarily exposed and ultimately destroyed, as is the case for fossil-bearing strata uncovered by erosion or construction. The presence of a fossil collection locality within a District facility site or within 100 feet of a District facility site indicates that fossils have been recovered from that location, and that additional fossils are likely to be recovered if the fossil horizon (fossil-bearing stratum) is still present and will be affected by construction.

Based on the records search, 17 geologic units were identified that underlie the District's various school and administrative sites. A search of the documented fossil collection localities within the quarter-mile buffer indicated that 502 fossil collection localities are present within a quarter-mile radius of the District's various facilities, with 491 of those fossil collection localities being present within formations underlying existing District facilities. A description of each of the geologic units identified during the paleontological records search and a summary of the fossils found from each geologic unit in the vicinity of existing District school and administrative sites are provided below. Determination of whether a particular geologic unit underlies a given District facility was based on a geographic information systems (GIS) analysis using published geologic maps (Kennedy and Tan 2008), District facility maps, and SDNHM paleontological records.

## Artificial Fill (af)

Artificial fill is widespread within the Program area, but is typically only mapped where present in very large volumes as the result of major urban design projects (e.g., construction of Mission Bay Park, dredging of San Diego Bay). Elsewhere in the Program area, artificial fill is present in areas of previous development (both documented and undocumented fill materials) and underlying/supporting roadways. Most if not all of the existing District facilities are almost certainly underlain by at least small volumes of artificial fill (placed during the original mass grading phase of site development). Because artificial fill has been previously disturbed and may have been imported to a project site, any possible contained fossil remains have lost their original stratigraphic contextual data and are thus of little scientific value.

SDNHM does not have any documented fossil collection localities from artificial fill within the city of San Diego.

## Late Quaternary Alluvium (young alluvial flood plain and colluvial deposits; Qya)

Alluvial and colluvial deposits found within the Program area are generally considered to be primarily Holocene in age (less than 11,700 years old), and consist of poorly consolidated, poorly sorted clay, silt, and sand deposited by the action of waterways (e.g., rivers, streams) or slope runoff. These deposits are relatively young in geologic age and do not typically contain fossils. However, these surficial sediments may be fairly thin and could overlie geologic units containing fossils at shallow depths.

SDNHM does not have any documented fossil collection localities from late Quaternary alluvium within a quarter-mile radius of existing District facilities.

## Quaternary Landside Deposits (derived from the Scripps Formation; Qls)

Landslide deposits of Pleistocene and Holocene age (less than 750,000 years old) in the Program area range from small slope failures containing poorly sorted, loosely consolidated, fragmentary blocks of sedimentary matrix to large-scale slides containing relatively intact slumped blocks of sedimentary strata. Landslide deposits may be derived from geologic units containing fossil remains, but only deep-seated slides consisting of large, slumped blocks with intact, recognizable stratigraphy are generally considered to preserve sufficient original stratigraphic features to provide the context necessary to make any associated paleontological resources relevant and important.

SDNHM does not have any documented fossil collection localities from landslide deposits within a quarter-mile radius of existing District facilities.

## Pleistocene River Terrace Deposits (old alluvial flood plain deposits; Qoa)

River terrace deposits of middle to late Pleistocene age (approximately 750,000 to 11,700 years old) occur along the margins of larger coastal valleys in the Program area. These deposits occur at levels above the modern active stream channels and represent the sediments deposited along ancient river flood plains. Fossils recovered from these deposits include skeletal remains of reptiles, birds, small mammals, and large-bodied “Ice-Age” mammals such as mammoth, bison, horse, and camel.

SDNHM does not have any documented fossil collection localities from Pleistocene river terrace deposits within a quarter-mile radius of existing District facilities.

## Bay Point Formation (old paralic deposits; Qop)

The Bay Point Formation, as the name is applied here, consists of both marine and non-marine sedimentary deposits, the former associated with a "stair-step" sequence of uplifted wave-cut platforms (i.e., ancient sea floors generally below 180 feet in elevation) and the mouths of drowned river valleys, and the latter associated with ancient and uplifted valley fills. As thus defined, the Bay Point Formation is broadly correlative with the old paralic deposits, units 1 through 8 mapped by Kennedy and Tan (2008), which span the middle and late Pleistocene (approximately 450,000 to 45,000 years ago). Fossils recovered from the Bay Point Formation include large and diverse assemblages of marine invertebrates (primarily mollusks) and, less commonly, remains of marine vertebrates (e.g., sharks, rays, bony fishes) as well as localized occurrences of terrestrial vertebrates (e.g., horse, camel, ground sloth, mastodon, mammoth).

SDNHM has 190 documented fossil collection localities from the Bay Point Formation within a quarter-mile radius of existing District facilities. These localities produced trace fossils (e.g., sponge, bryozoan, spionid worm, and mollusk borings in mollusk shells, and burrows in sedimentary matrix), as well as fossil remains or impressions of a diverse array of marine invertebrates (e.g., foraminifers, bryozoans, corals, ostracods, brachiopods, snails, clams, mussels, oysters, scallops, tusk shells, chitons, barnacles, decapod crustaceans, shrimp, sand dollars, sea urchins, heart urchins), as well as marine vertebrates (e.g., sharks, rays, skates, bony fishes, baleen whales), terrestrial vertebrates (e.g., amphibians, turtles, snakes, lizards, birds, rodents, rabbits, camels, pronghorn, horses, mammoths), and vascular plants (e.g., wood and leaf impressions).

## Lindavista Formation (very old paralic deposits; Qvop)

The Lindavista Formation consists of fluvial, aeolian, and shallow nearshore marine terrace deposits of early to middle Pleistocene age (approximately 1.5 to 0.5 million years old), and is broadly correlative with the very old paralic deposits, units 1 through 13 mapped by Kennedy and Tan (2008). These deposits accumulated on a series of flat, wave-cut platforms (i.e., ancient sea floors generally above 220 feet in elevation) during periods of falling sea level. The Lindavista Formation today forms the extensive and heavily developed mesa surfaces characteristic of the San Diego Mesa, Linda Vista Mesa, Kearny Mesa, and Mira Mesa areas within the Program area. Rare fossil localities within the Lindavista Formation have been recorded in a few areas (e.g., Tierrasanta, Kearny Mesa, Mira Mesa), and have yielded remains of nearshore marine invertebrates (e.g., clams, scallops, snails, barnacles, sand dollars) and sparse remains of sharks and baleen whales.

SDNHM has 14 documented fossil collection localities from the Lindavista Formation within a quarter-mile radius of existing District facilities. These localities produced trace fossils (e.g., worm burrows in matrix, pholad clam borings in rock), shells or tests of marine invertebrates (e.g., snails, clams, mussels, oysters, scallops, barnacles, sea urchins), and teeth and bones of rays, baleen whales, and deer.

## San Diego Formation (Tsd)

The San Diego Formation is a sedimentary rock unit deposited in an open marine embayment during the late Pliocene and early Pleistocene (approximately 3 to 1.5 million years ago). It is

exposed from the International Border north to Mission Valley, and in isolated outcrops at Tecolote Canyon, Balboa Avenue, Rose Canyon, and the southern slopes of Mount Soledad. The San Diego Formation has produced scientifically important remains of marine vertebrates (especially marine mammals, such as walrus, fur seal, sea cow, dolphin, and baleen whale), sea birds, sharks, bony fishes, and marine mollusks, crustaceans, and echinoderms. Also recovered from this geologic unit are rare remains of terrestrial mammals (e.g., cat, horse, camel, gomphothere, ground sloth) and plants (e.g., palm, pine, oak, sycamore, avocado).

SDNHM has 196 documented fossil collection localities from the San Diego Formation within a quarter-mile radius of existing District facilities. These localities produced trace fossil borings (e.g., of sponges, bryozoans, spionid worms, mollusks), burrows, and coprolites, and remains of vascular plants (e.g., wood and seed pods), abundant marine invertebrates (e.g., foraminifers, bryozoans, sponges, brachiopods, snails, clams, mussels, oysters, scallops, tusk shells, chitons, ostracods, barnacles, decapod crustaceans, stomatopods, sea stars, sea urchins, heart urchins, sand dollars), marine vertebrates (e.g., sharks, rays, skates, bony fishes, fur seals, walrus, sea cows, dolphins, baleen whales), sea birds (e.g., murrelets, auks, loons, cormorants, grebes, gannets, albatross, puffins), and terrestrial mammals (e.g., rabbits, horses, remains of a bovid).

## Otay Formation (To)

The Otay Formation consists of fluvial deposits of late Oligocene age (approximately 29 million years old) ranging in composition from tuffaceous sandstones, claystones, and bentonites (upper sandstone-mudstone unit) to coarse-grained sandstones and angular gravels (middle gritstone unit) to cobble and boulder fanglomerate (lower angular conglomerate unit). Fossil localities are abundant in the upper and middle units of the formation, and have primarily been discovered in the Eastlake and Otay Ranch areas of the city of Chula Vista. Recovered fossils include well-preserved remains of a diverse assemblage of terrestrial vertebrates (e.g., tortoises, lizards, snakes, birds, shrews, rodents, rabbits, dogs, foxes, rhinoceroses, camels, mouse-deer, oreodonts), and is considered the richest source of such fossils in California.

SDNHM does not have any documented fossil collection localities from the Otay Formation within a quarter-mile radius of existing District facilities.

## "Sweetwater" Formation (Tsw)

While not identified on the most current published geologic maps covering the District, the middle Eocene-age (approximately 42 to 37 million years old) "Sweetwater" Formation is present in the Sweetwater and Chollas Valley areas, and either abruptly overlies or grades into the underlying Mission Valley Formation. The "Sweetwater" Formation consists of fluvial channel fill sediments (fining-upward sequences of gritstone, sandstone, siltstone, and mudstone) and paleosols (ancient soils). Fossils recovered from the formation include teeth of opossums, insectivores, and rodents.

SDNHM has two documented fossil collection localities from the "Sweetwater" Formation within a quarter-mile radius of existing District facilities. These localities produced a small assemblage of terrestrial mammals (e.g., the insectivore *Sespedectes singularis*, the rodents *Pareumys* and *Simimys*, an unidentified Eomyid rodent) and a few invertebrates (e.g., ostracods, gastropods).

## Pomerado Conglomerate (Tp)

The Pomerado Conglomerate consists of fluvial and nearshore marine deposits of middle to late Eocene age (approximately 42 to 37 million years old). It contains three members: a thin lower conglomerate member, a middle sandstone member, and a thick upper conglomerate member. Abundant remains of terrestrial mammals (e.g., opossums, insectivores, primates, carnivores, rodents, artiodactyls, horses) have been recovered from both of the conglomerate members, with some sparse vertebrate remains also recovered from the middle sandstone member. In addition, nearshore marine mollusks (e.g., clams, snails) have been recovered from the middle sandstone member.

SDNHM has two documented fossil collection localities from the Pomerado Conglomerate within a quarter-mile radius of existing District facilities. One of these localities is from the contact between the lower and middle members of the formation, and yielded internal and external molds of marine mollusks (clams and snails) and a freshwater mussel. The other is from fluvial deposits of the lower member, and yielded a turtle shell fragment and an artiodactyl molar.

## Mission Valley Formation (Tmv)

The Mission Valley Formation, of middle Eocene age (approximately 43 million years old), contains marine sandstones that grade into fluvial sandstones, siltstones, and mudstones to the east and south of its type area in Mission Valley. Marine deposits of the Mission Valley Formation have produced abundant and well-preserved remains of marine invertebrates (e.g., foraminifers, clams, snails, crustaceans, sea urchins) and marine vertebrates (e.g., sharks, rays, bony fishes), while fluvial strata have produced petrified wood and fairly large and diverse assemblages of fossil mammals (e.g., opossums, insectivores, bats, primates, rodents, artiodactyls, perissodactyls). The co-occurrence of land mammal assemblages and marine microfossils, mollusk, and vertebrate assemblages is significant and unique in California because it allows for the direct biostratigraphic correlation of terrestrial and marine faunas.

SDNHM has 42 documented fossil collection localities from the Mission Valley Formation within a quarter-mile radius of existing District facilities. Localities from marine deposits yielded trace fossils (e.g., burrows in matrix and shell-lined burrows, sponge borings, worm tubes, shipworm borings in wood), and fossil impressions or remains of marine invertebrates (e.g., foraminifers, corals, bryozoans, brachiopods, snails, clams, mussels, oysters, tusk shells, nautiloids, barnacles, crabs, sea urchins, heart urchins) and marine vertebrates (e.g., sharks, skates, rays, bony fishes). The localities recovered from fluvial strata meanwhile yielded impressions or remains of plants (e.g., wood of unidentified vascular plants, impressions of horsetail stems, seed pods of tropical almond), freshwater mollusks (e.g., pulmonate snails, freshwater mussels), terrestrial vertebrates (e.g., crocodiles, lizards, snakes, turtles, mammals including marsupials, apatemyids, insectivores, primates, miacids, tapirs, abundant rodents, and several types of artiodactyl), and coprolite traces. One additional locality from undifferentiated marine deposits of the Mission Valley Formation and Stadium Conglomerate produced fossil impressions of a small assemblage of marine snails, clams, mussels, and oysters, as well as trace fossil sponge borings and a wood fragment from a terrestrial vascular plant.

## Stadium Conglomerate (Tst)

The Stadium Conglomerate consists of two members of fluvial and deltaic marine conglomerates and sandstones deposited during the middle Eocene (approximately 44 to 42 million years ago). The lower member has produced sparse marine fossils and a scientifically important fossil mammal assemblage, while the upper member has produced marine invertebrate fossils (e.g., foraminifers, mollusks), sparse but well preserved remains of terrestrial mammals (e.g., opossums, insectivores, primates, rodents, carnivores, rhinoceros, artiodactyls), and scattered petrified wood. The prominent conglomerate unit mapped by Kennedy (1975) and Kennedy and Tan (2008) as the Stadium Conglomerate to the north of SR-52, including some areas underlying existing District facilities, has been reinterpreted based on fossil evidence as a conglomerate tongue within the Friars Formation (Walsh 1996; Walsh et al. 1996).

SDNHM has two documented fossil collection localities from the Stadium Conglomerate within a quarter-mile radius of existing District facilities. These localities yielded a small collection of impressions of marine bryozoans, snails, clams, and mussels, as well as impressions of freshwater mussels. One additional locality from undifferentiated marine deposits of the Mission Valley Formation and Stadium Conglomerate produced fossil impressions of a small assemblage of marine snails, clams, mussels, and oysters, as well as trace fossil sponge borings and a wood fragment from a terrestrial vascular plant.

## Friars Formation (Tf)

The Friars Formation, of middle Eocene age (approximately 47 to 46 million years old), is divided into a lower tongue, a middle conglomerate tongue, and an upper tongue. All three tongues of the Friars Formation are primarily terrestrial/fluvial in origin, but also contain lagoonal or marine facies in western exposures. The formation has produced diverse assemblages of terrestrial mammals (e.g., opossums, insectivores, primates, rodents, artiodactyls, perissodactyls), and has also yielded fossil leaves, marine microfossils (foraminifers), and marine invertebrate (clams and snails) remains.

SDNHM has 14 documented fossil collection localities from the Friars Formation within a quarter-mile radius of existing District facilities. These localities produced trace fossils (e.g., coprolites, including a specimen containing lizard scutes), stem and leaf impressions of a diverse array of plants (e.g., fern, euphorbia, dogbane, willow, mallow, myrtle, plane tree, mulberry, sumac, mahogany), shell impressions of freshwater mollusks (e.g., pulmonate snails, clams), and bones and teeth of a diverse assemblage of terrestrial vertebrates (e.g., crocodiles, lizards, snakes, turtles, birds, marsupials, apatotheres, insectivores, bats, primates, creodonts, miacids, rodents, artiodactyls, perissodactyls including brontotheres).

## Scripps Formation (Tsc)

The Scripps Formation, of early middle Eocene age (approximately 47 million years old), consists of interbedded claystones, siltstones, and sandstones with some cobble conglomerates deposited in a marine continental shelf setting. It has primarily yielded fossil remains of marine organisms (e.g., clams, snails, crabs, sharks, ray, bony fishes), but sparse remains of aquatic and terrestrial organisms are also known from the formation, including reptiles (e.g., crocodile, turtle), terrestrial mammals (e.g., uintatheres, brontothere, rhinoceros, artiodactyl), and land plants.

SDNHM has 16 documented fossil collection localities from the Scripps Formation within a quarter-mile radius of existing District facilities. These localities yielded trace fossils (e.g., burrows, spionid worm borings) and fossil impressions or remains of terrestrial plants (e.g., magnolia, tropical almond, plane tree, bittersweet), marine invertebrates (e.g., corals, bryozoans, snails, clams, mussels, oysters, tusk shells, barnacles, crabs, a heart urchin), and marine vertebrates (e.g., sharks, rays, bony fishes). An additional locality from undifferentiated deposits of the Scripps Formation or Ardath Shale yielded partial shells of the extinct nautiloid *Aturia myrli*.

## Ardath Shale (Ta)

The Ardath Shale, of early middle Eocene age (approximately 48 to 47 million years ago), consists of marine shales, siltstones, and sandstones deposited in a marine outer continental shelf setting. The formation is exposed in the sea cliffs from Torrey Pines south to Scripps Institute of Oceanography and inland from Rose Canyon south to Tecolote Canyon. The Ardath Shale has produced diverse and well-preserved fauna of marine microfossils (e.g., coccoliths, foraminifers), invertebrates (e.g., mollusks and decapod crustaceans, in particular), and vertebrates (e.g., sharks, rays, bony fishes).

SDNHM has eight documented fossil collection localities from the Ardath Shale within a quarter-mile radius of existing District facilities. These localities produced trace fossil burrows and impressions of terrestrial plants (e.g., tropical almond), impressions and shells/tests of marine invertebrates (e.g., foraminifers, a solitary coral, brachiopods, snails, clams, mussels, oysters, tusk shells, crabs, heart urchins), shark teeth, and teeth and scales of bony fishes. An additional locality from undifferentiated deposits of the Scripps Formation or Ardath Shale yielded partial shells of the extinct nautiloid *Aturia myrli*.

## Cabrillo Formation (Kc)

The Cabrillo Formation, of late Cretaceous-age (approximately 70 million years old), is composed of sandstones and conglomerates deposited in a marine continental shelf and slope setting. The formation is exposed in various places on Mount Soledad and the Point Loma peninsula. Fossils from the Cabrillo Formation are sparely known, but include remains of marine invertebrates (e.g., clams, snails, ammonites), marine vertebrates, such as sharks, and land plants such as cycads and dawn redwood.

SDNHM has three documented fossil collection localities from the Cabrillo Formation within a quarter-mile radius of existing District facilities. These localities yielded impressions of leaves of terrestrial plants (e.g., *Araucaria* sp., a relative of the extant monkey-puzzle tree) and impressions and shells of a small assortment of marine snails, clams, oysters, and ammonites.

## Santiago Peak Volcanics (metasedimentary and metavolcanic rocks; Mzu)

The Santiago Peak Volcanics, of early Cretaceous age (approximately 145 to 125 million years old), consist of slightly to moderately metamorphosed volcanic rocks (primarily volcanic breccias, tuffs, and flow rocks) interbedded with slightly to moderately metamorphosed marine mudstones and sandstones. The metavolcanic portions of this unit rarely preserve fossils because of the high temperatures associated with their volcanic origin, but petrified wood has been found in volcanic breccia layers within the formation. The metasedimentary portions have yielded siliceous microfossils (e.g., radiolarians) and marine macroinvertebrate fossils (e.g., clams, belemnites). Overall, however, fossils are very rare.

SDNHM does not have any documented fossil collection localities from the Santiago Peak Volcanics within a quarter-mile radius of existing District facilities.

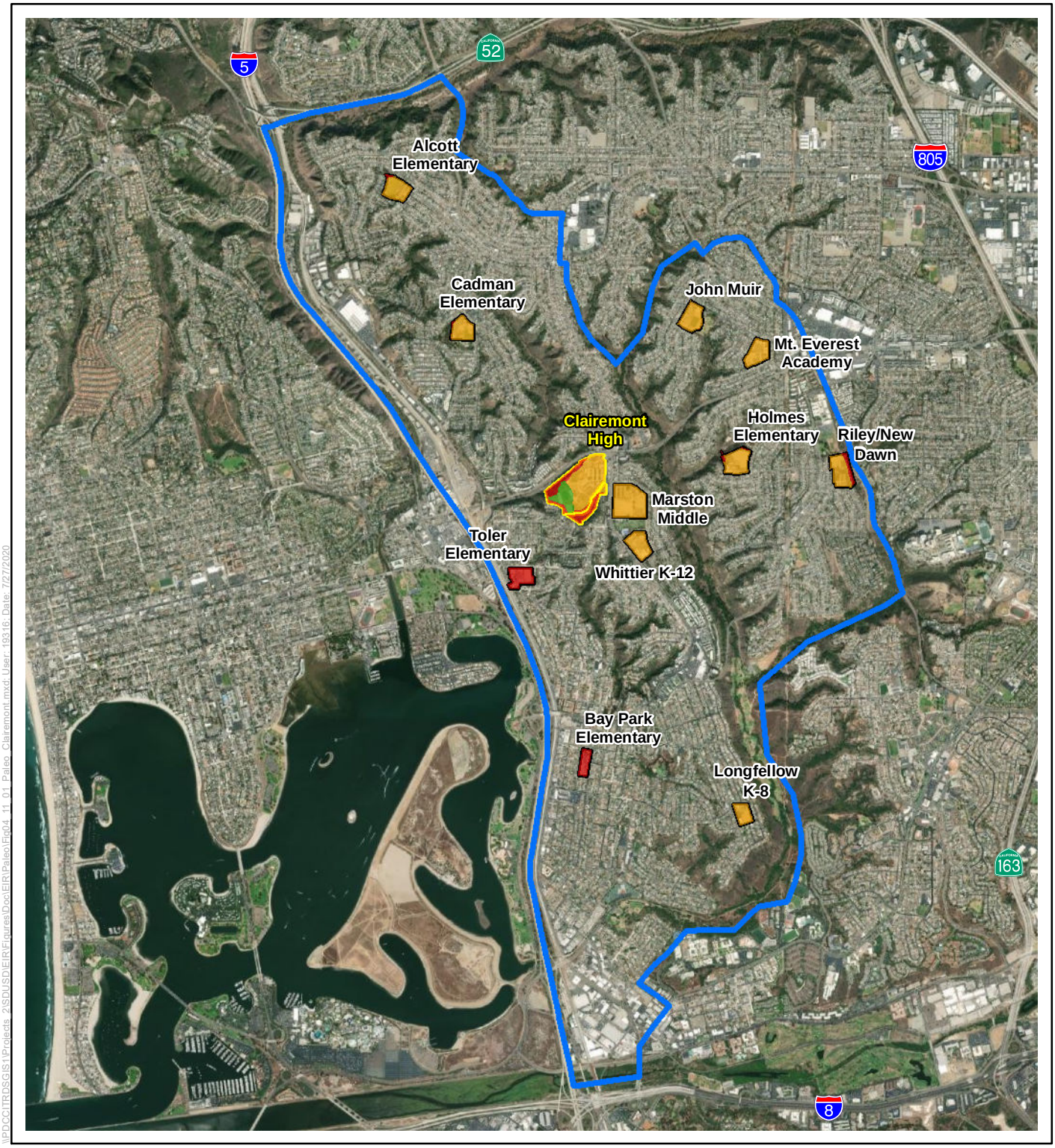
### 4.11.2.4 Paleontological Sensitivity

Based on the known fossil productivity of individual geologic units in San Diego County, levels of paleontological resource potential and sensitivity have been developed (Deméré and Walsh 1993). For the purposes of establishing the likely presence of paleontological resources, geologic units are assigned a paleontological sensitivity of high, moderate, low, or no potential.

Paleontological sensitivity is defined by the following:

- **High Sensitivity.** High paleontological sensitivity is assigned to geologic units known to contain paleontological localities with rare, well-preserved, critical fossil materials for stratigraphic or paleoenvironmental interpretation, and fossils providing important information about the paleoclimatic, paleobiological, and/or evolutionary history (phylogeny) of animal and plant groups. In general, geologic units with high sensitivity are considered to have the highest potential to produce unique invertebrate fossil assemblages or vertebrate fossil remains.
- **Moderate Sensitivity.** Moderate paleontological sensitivity is assigned to geologic units known to contain paleontological localities. These geologic units are judged to have a strong, but sometimes unproven, potential for producing unique and/or significant fossil remains (Deméré and Walsh 1993).
- **Low Sensitivity.** Low paleontological sensitivity is assigned to geologic units that, based on their relatively young age and/or high-energy depositional history, are judged unlikely to produce unique fossil remains. Low-sensitivity geologic units rarely produce fossil remains of scientific significance and are considered to have low sensitivity. However, when fossils are found in these formations, they are often very significant additions to our geologic understanding of the area.
- **No Sensitivity.** No paleontological sensitivity is assigned to geologic units that are entirely igneous in origin and therefore have no potential for producing fossil remains. This rating is also assigned to artificial fill materials that have lost the original stratigraphic/geologic context of any contained organic remains (e.g., fossils).

The paleontological sensitivity ratings of the various geologic units identified as part of the paleontological records search are summarized in Table 4.11-2 below and generally follow the ratings assigned in the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego 2016). The District's existing school and administrative sites that are underlain by geologic units with high, moderate, low, or no paleontological sensitivity are subsequently identified in Tables 4.11-3 through 4.11-5. The presence of any fossil collection localities within 100 feet of District facilities is also summarized, and the geologic unit from which fossils were collected is noted. Figures 4.11-1 through 4.11-17 depict the paleontological sensitivity underlying each District facility by cluster.

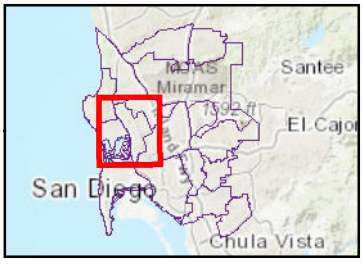



**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High



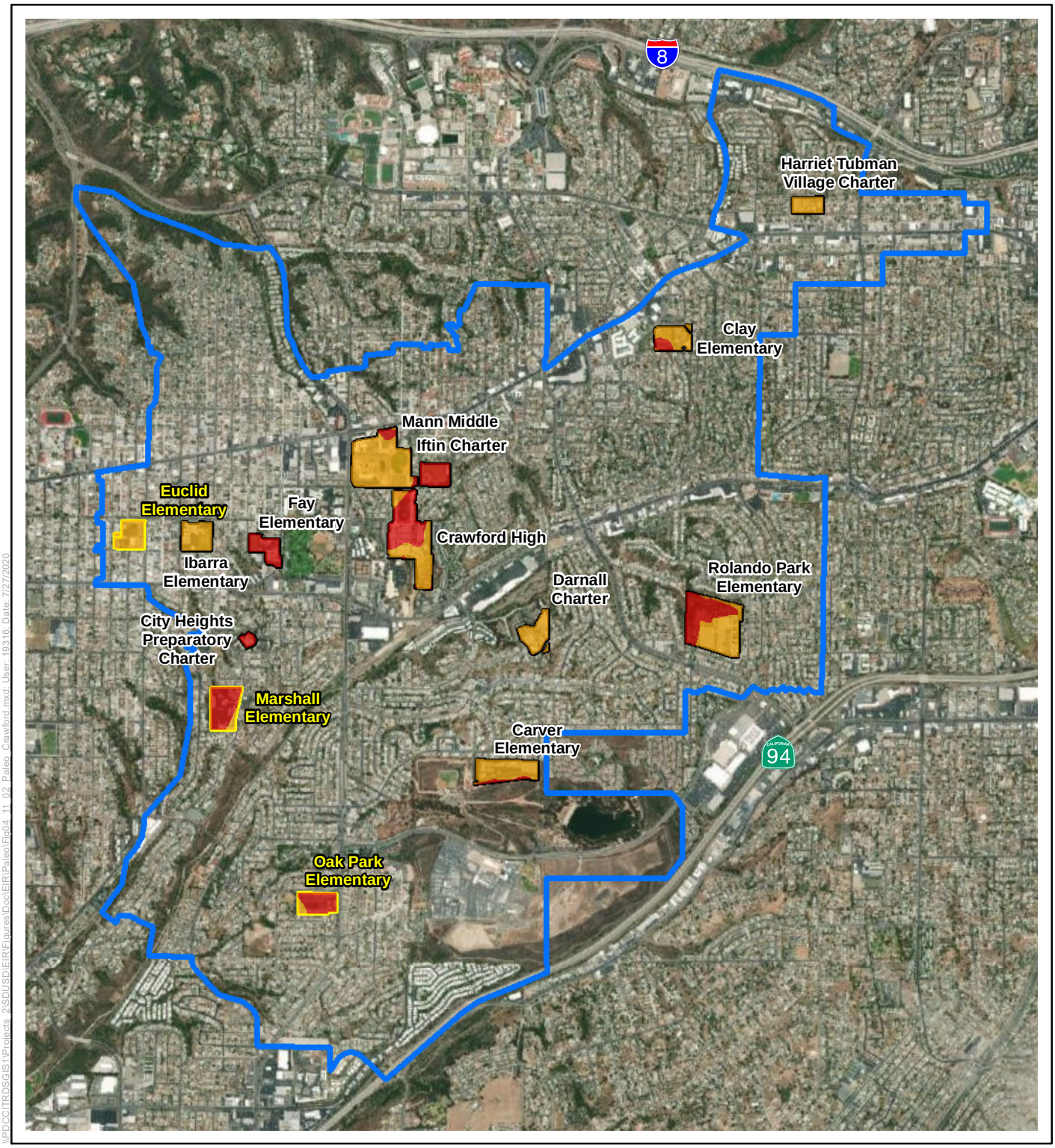

Source: SDNHM (2020)

0 0.5 1 Miles

N

**Figure 4.11-1**
**Paleontological Resources - Clairemont Cluster Area**

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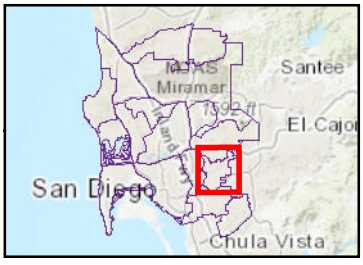

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**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High



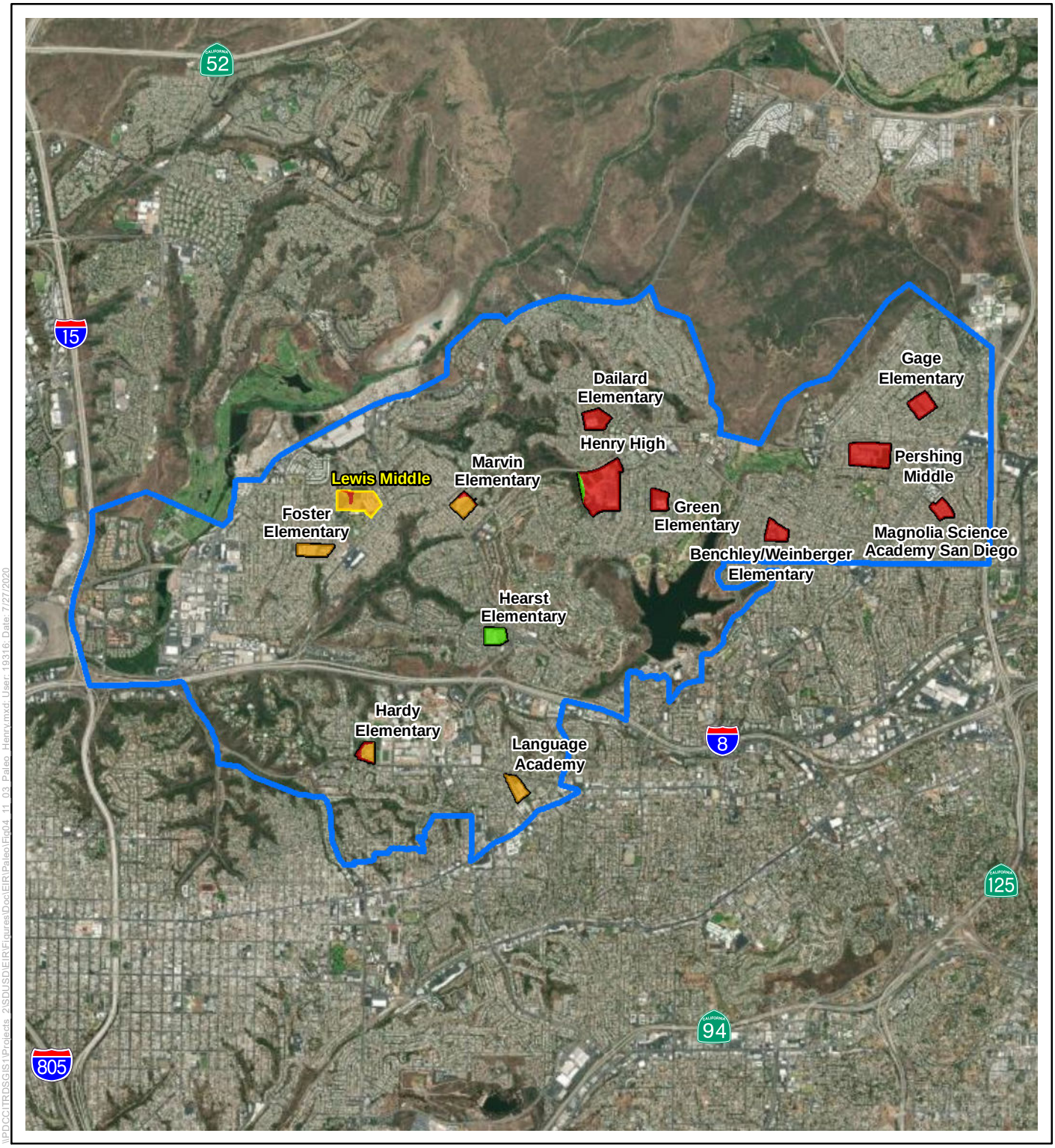

Source: SDNHM (2020)

ICF

N

0 0.25 0.5 Miles

**Figure 4.11-2**
**Paleontological Resources - Crawford Cluster Area**




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**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High

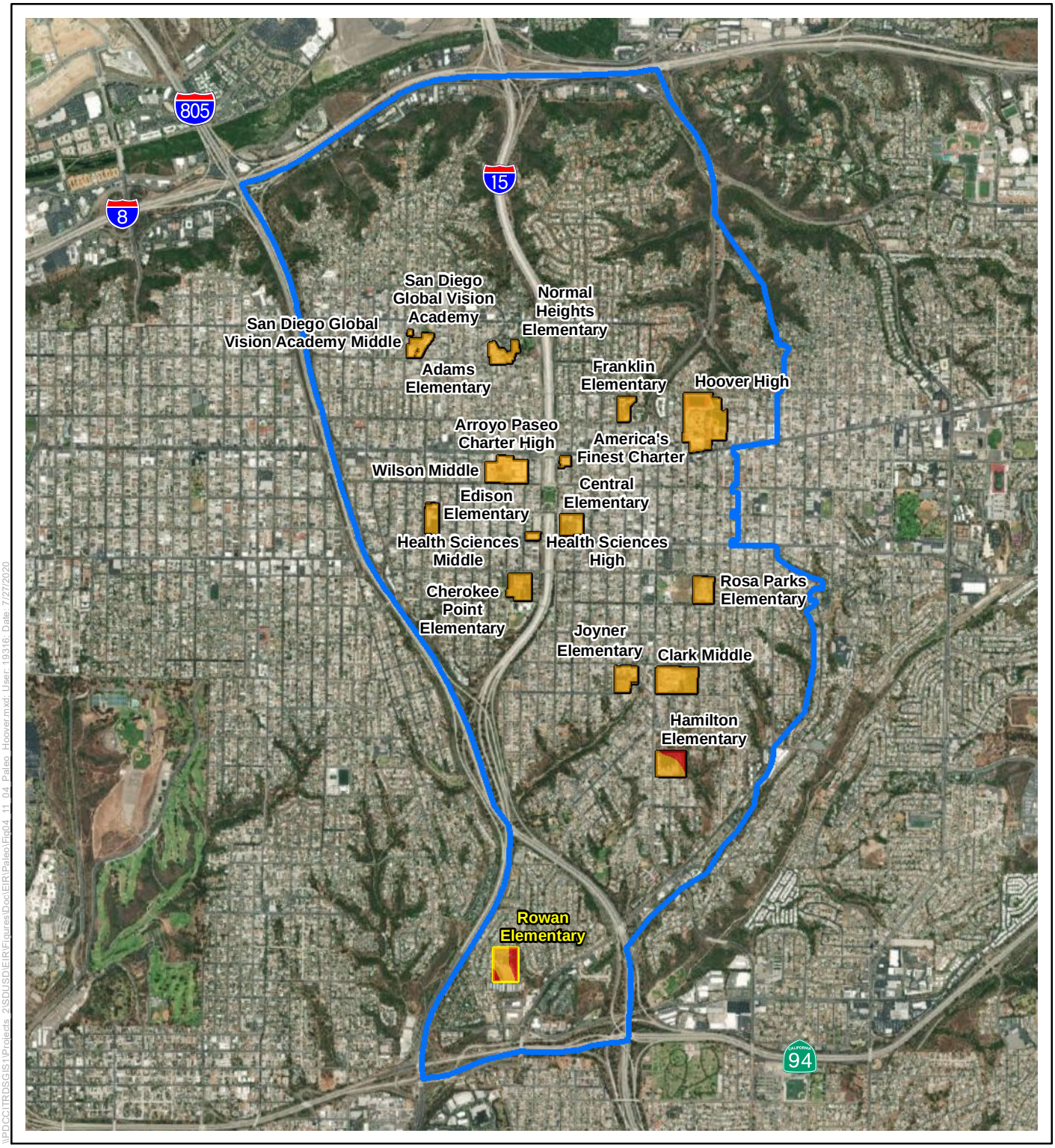



Source: SDNHM (2020)

0 0.5 1 Miles

N

**Figure 4.11-3**
**Paleontological Resources - Henry Cluster Area**




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**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High



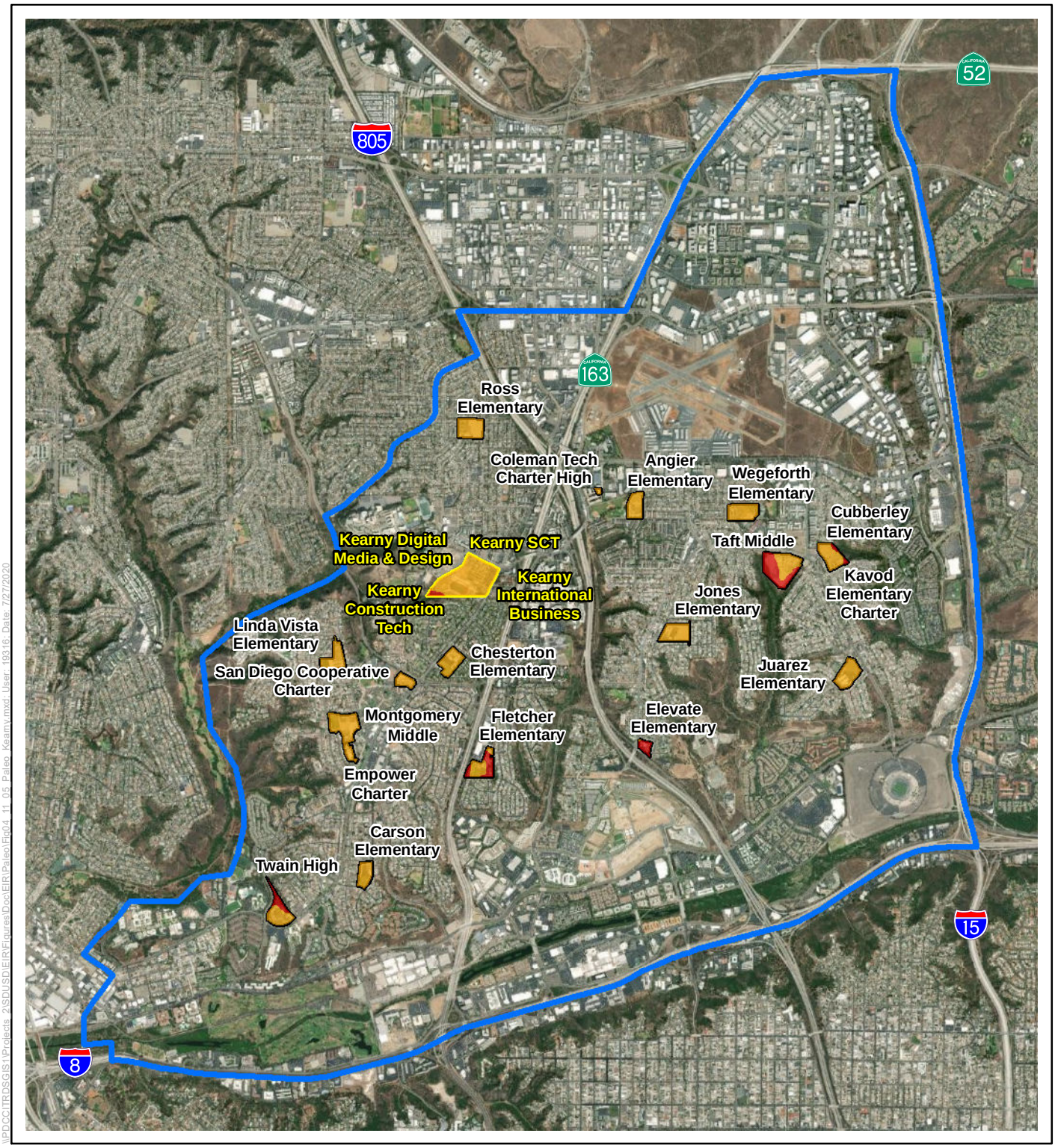

Source: SDNHM (2020)

ICF

N

0 0.25 0.5 Miles

**Figure 4.11-4**
**Paleontological Resources - Hoover Cluster Area**




**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High



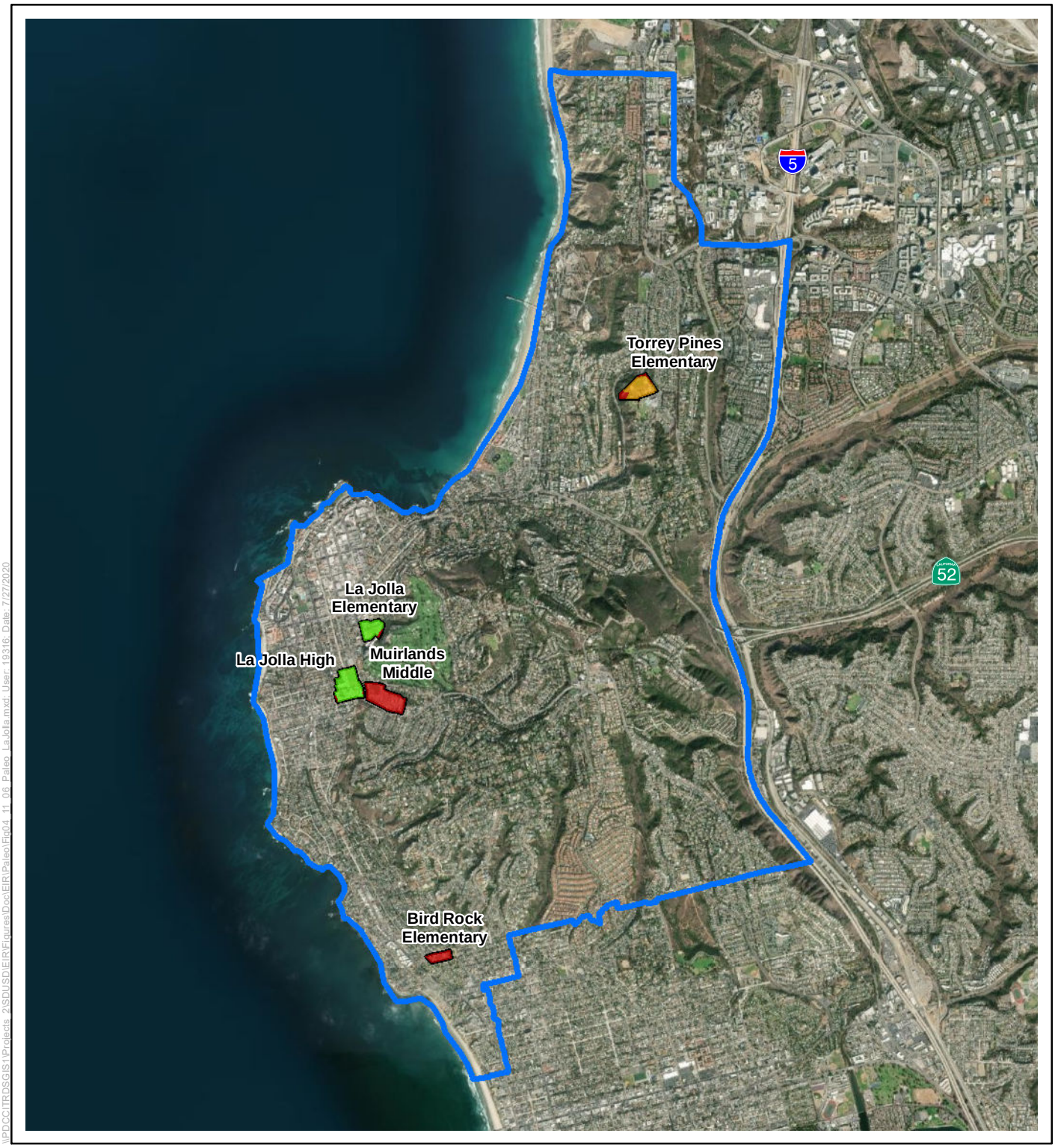

Source: SDNHM (2020)

0 0.25 0.5 Miles

N

**Figure 4.11-5**
**Paleontological Resources - Kearny Cluster Area**

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**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High



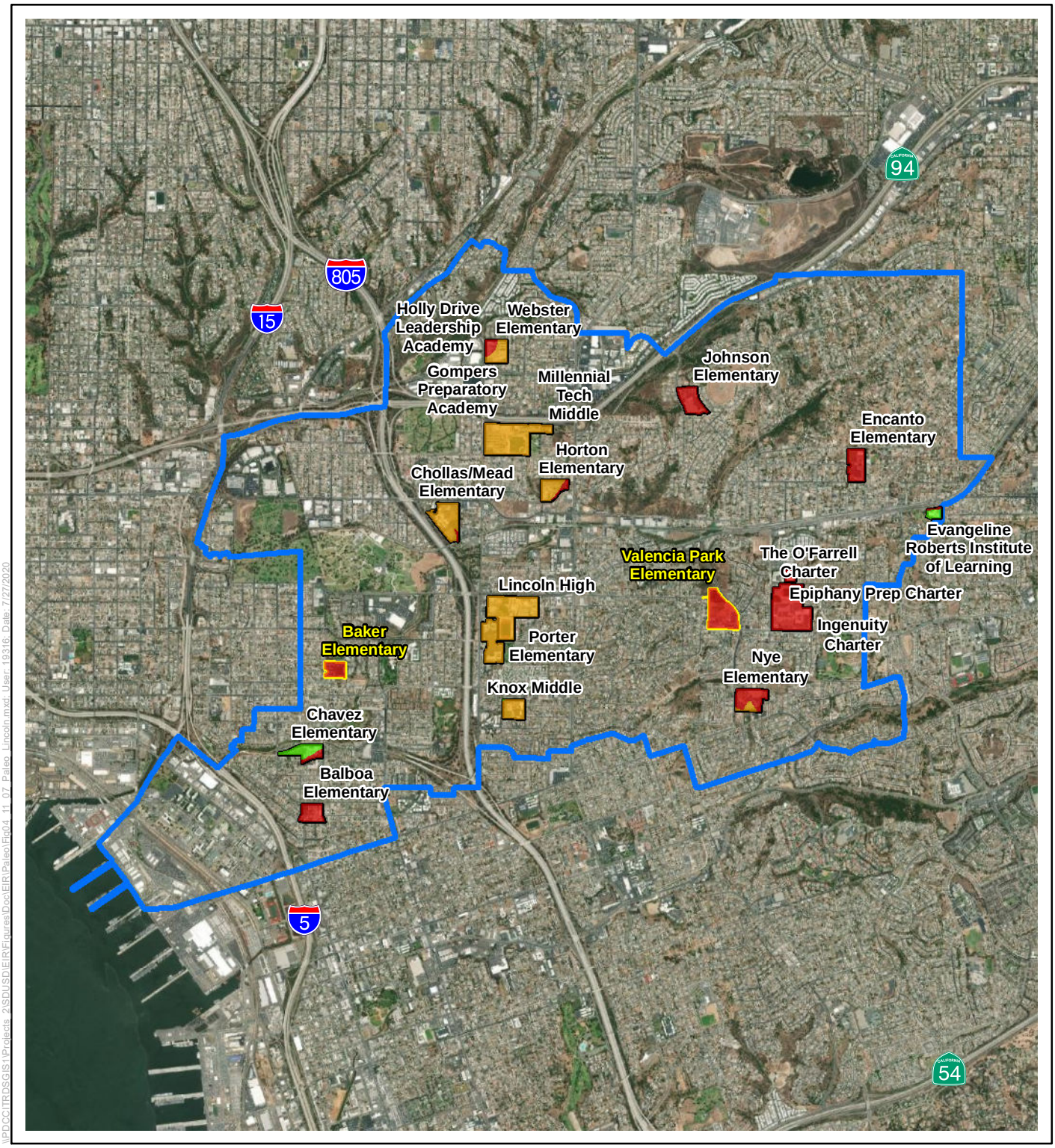

Source: SDNHM (2020)

ICF

N

0 0.25 0.5 Miles

**Figure 4.11-6**
**Paleontological Resources - La Jolla Cluster Area**




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**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High

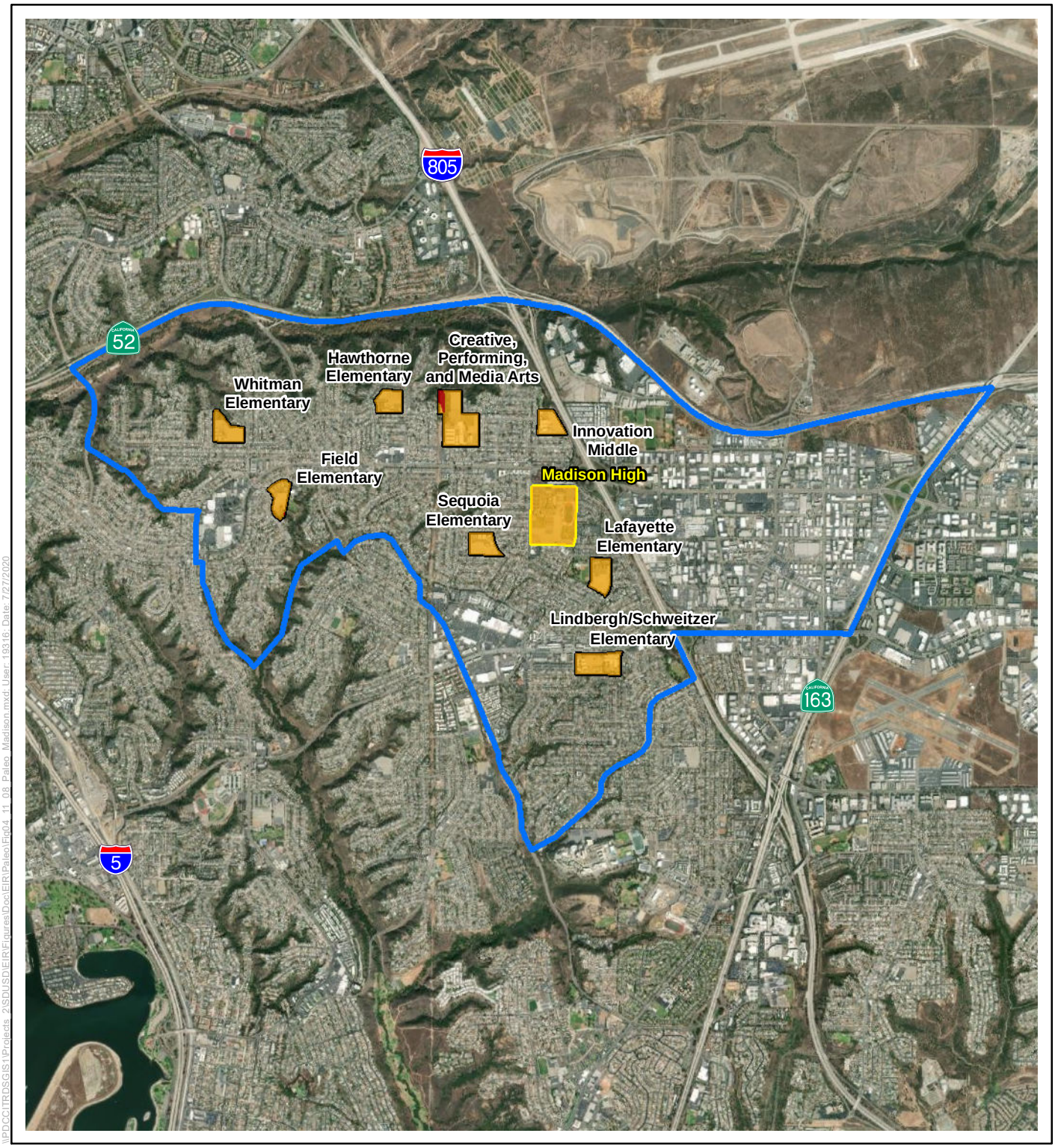



Source: SDNHM (2020)

0 0.25 0.5 Miles

N

**Figure 4.11-7**
**Paleontological Resources - Lincoln Cluster Area**



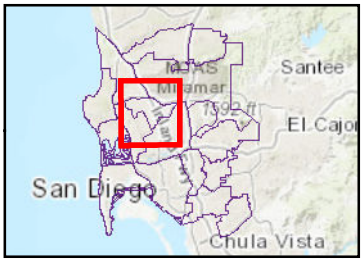

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**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High



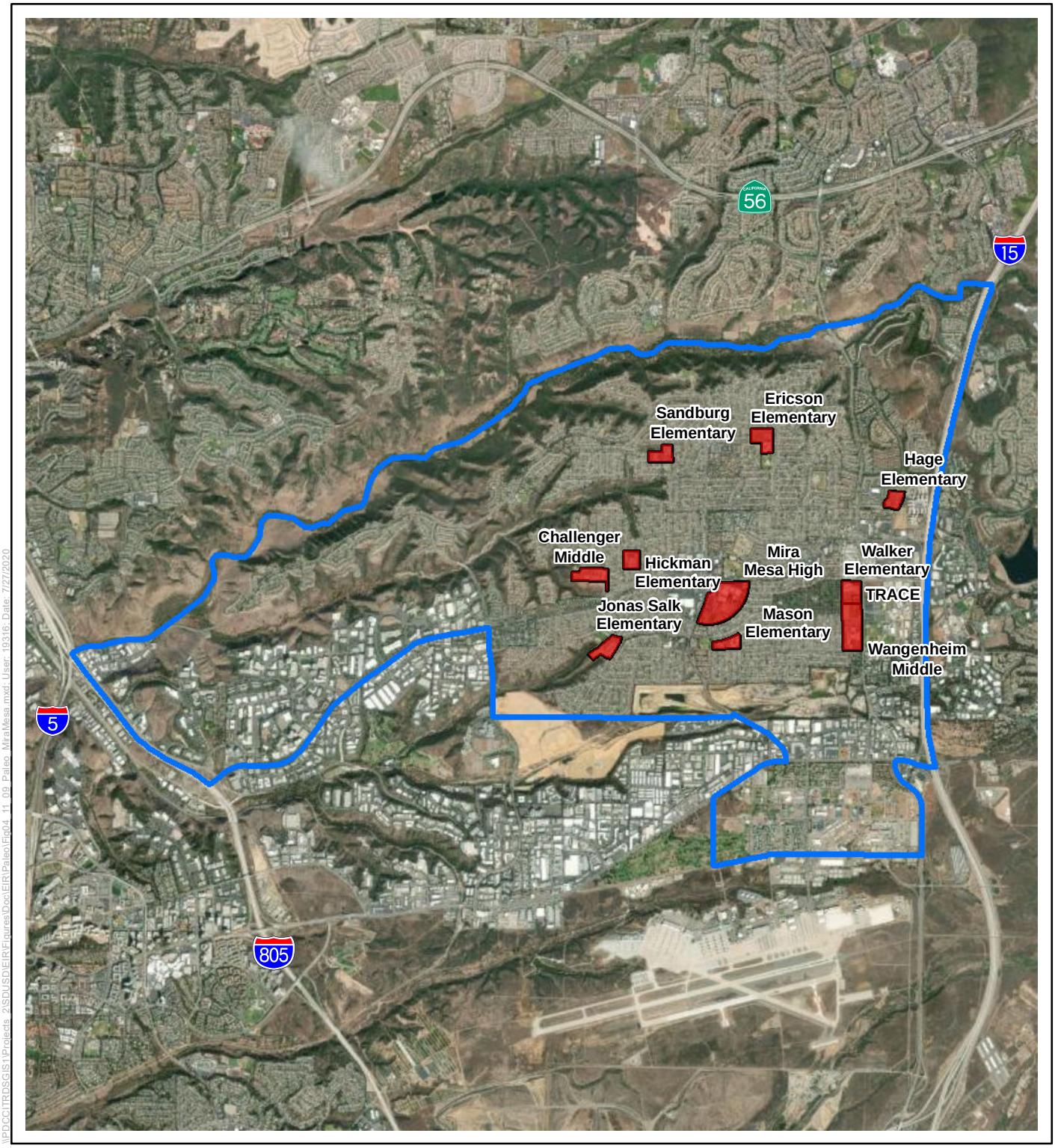

Source: SDNHM (2020)

ICF

N

0 0.25 0.5 Miles

**Figure 4.11-8**
**Paleontological Resources - Madison Cluster Area**

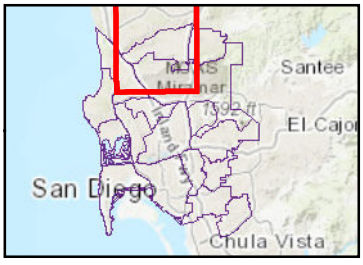



**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High



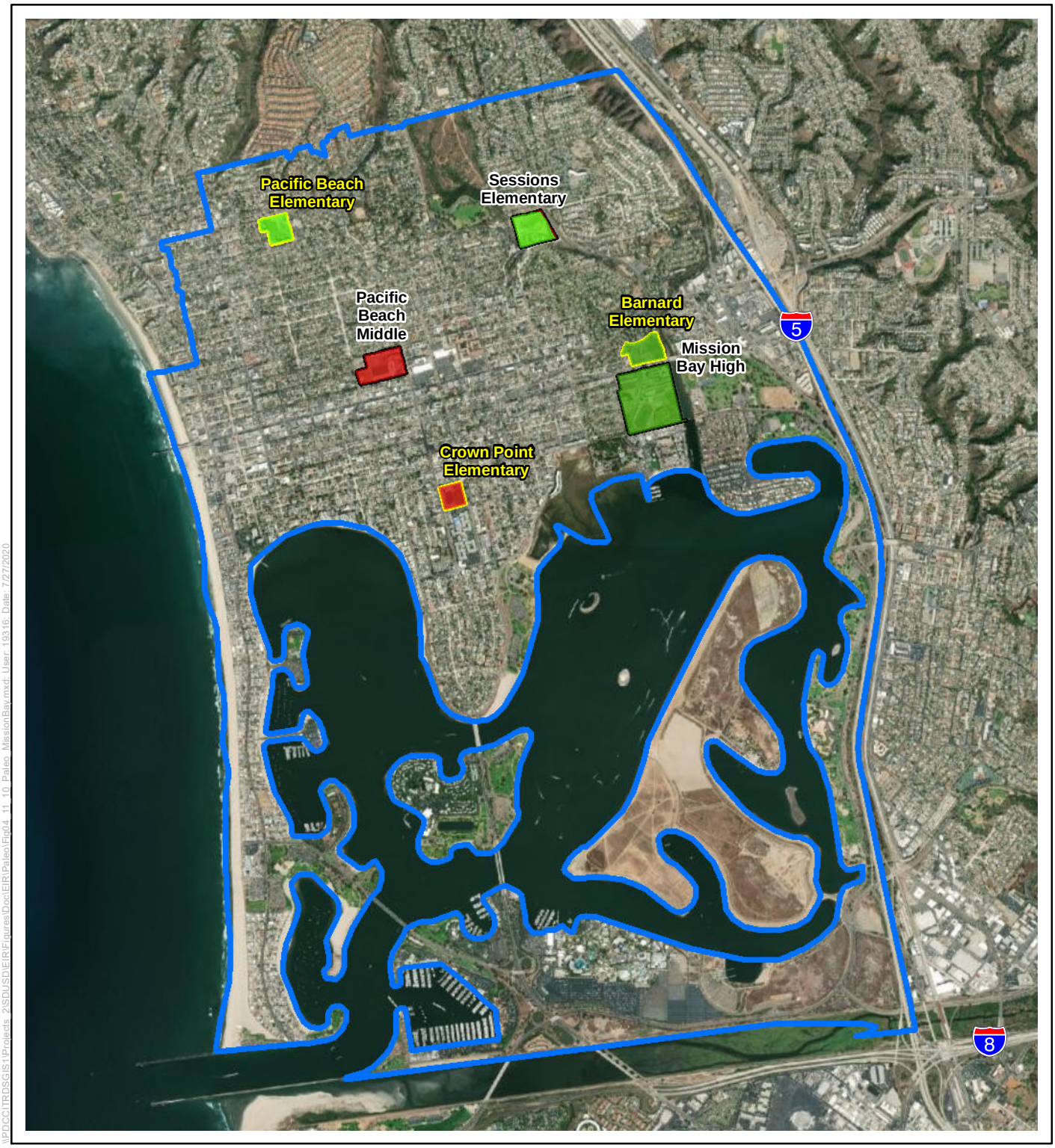

Source: SDNHM (2020)

ICF

N

0 0.25 0.5 Miles

**Figure 4.11-9**
**Paleontological Resources - Mira Mesa Cluster Area**




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**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High



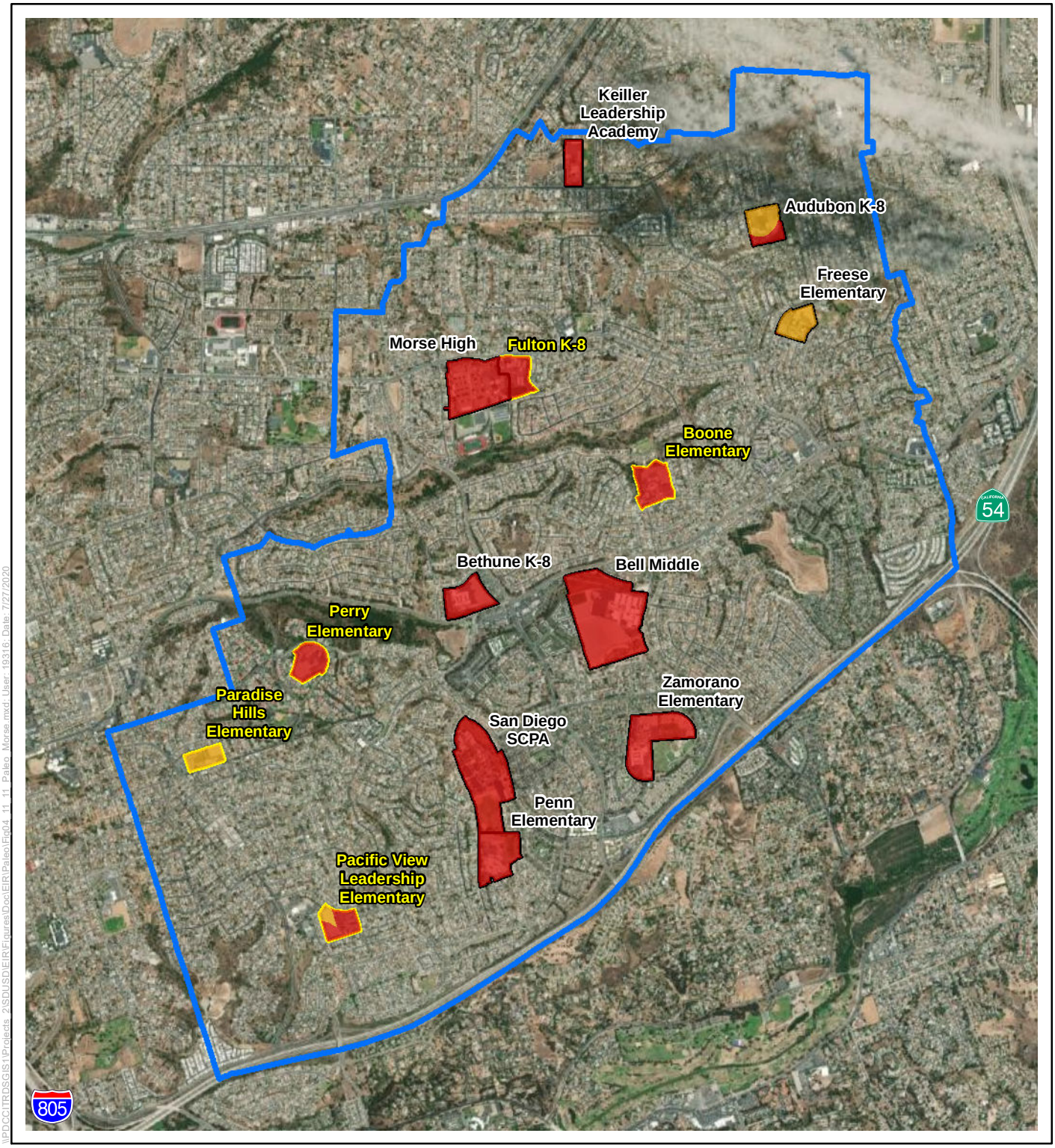

Source: SDNHM (2020)

ICF

N

0 0.25 0.5 Miles

**Figure 4.11-10**
**Paleontological Resources - Mission Bay Cluster Area**

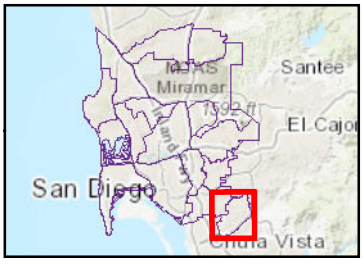



**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High

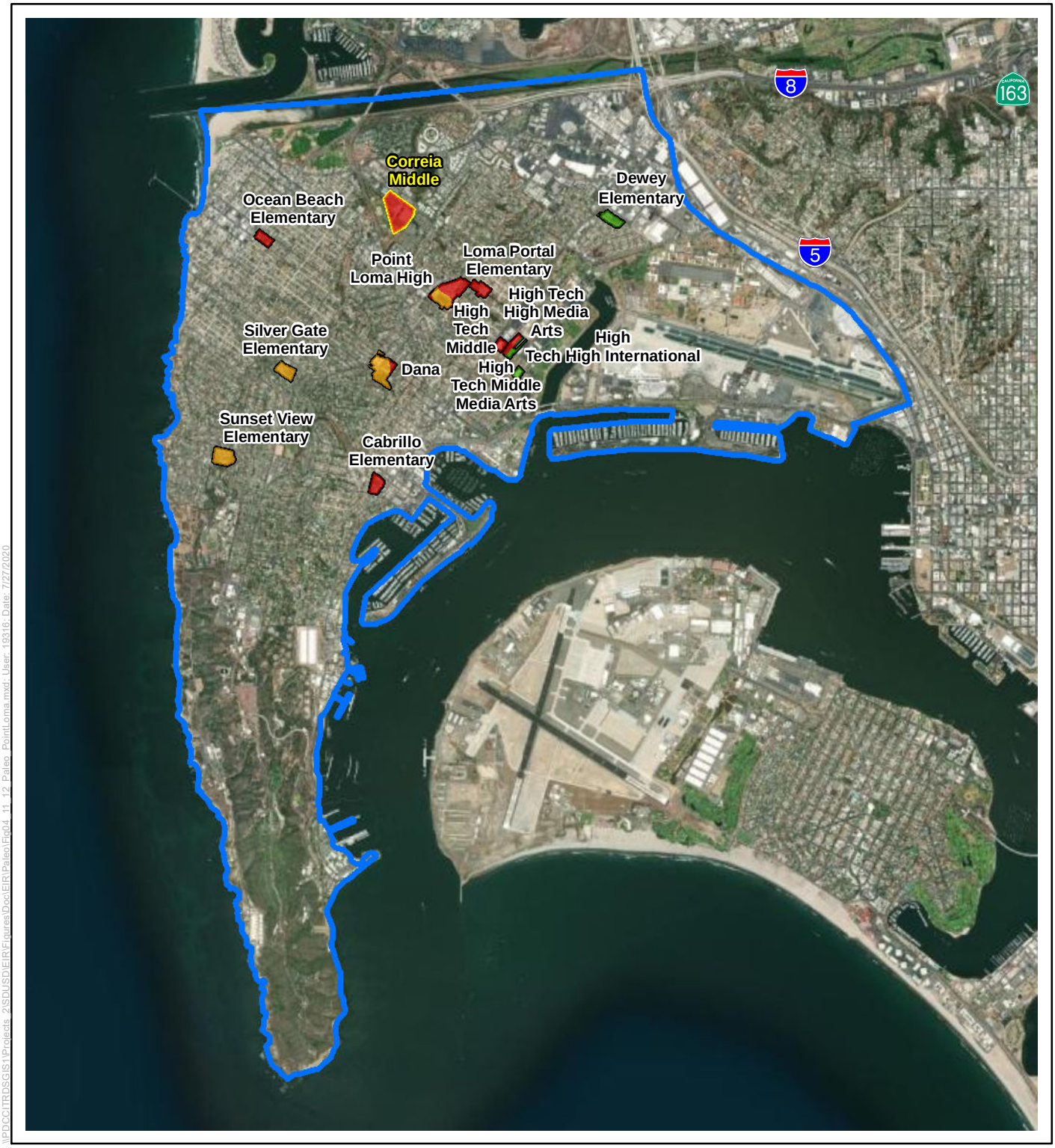



Source: SDNHM (2020)

0 0.25 0.5 Miles

N

**Figure 4.11-11**
**Paleontological Resources - Morse Cluster Area**




**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High




Source: SDNHM (2020)

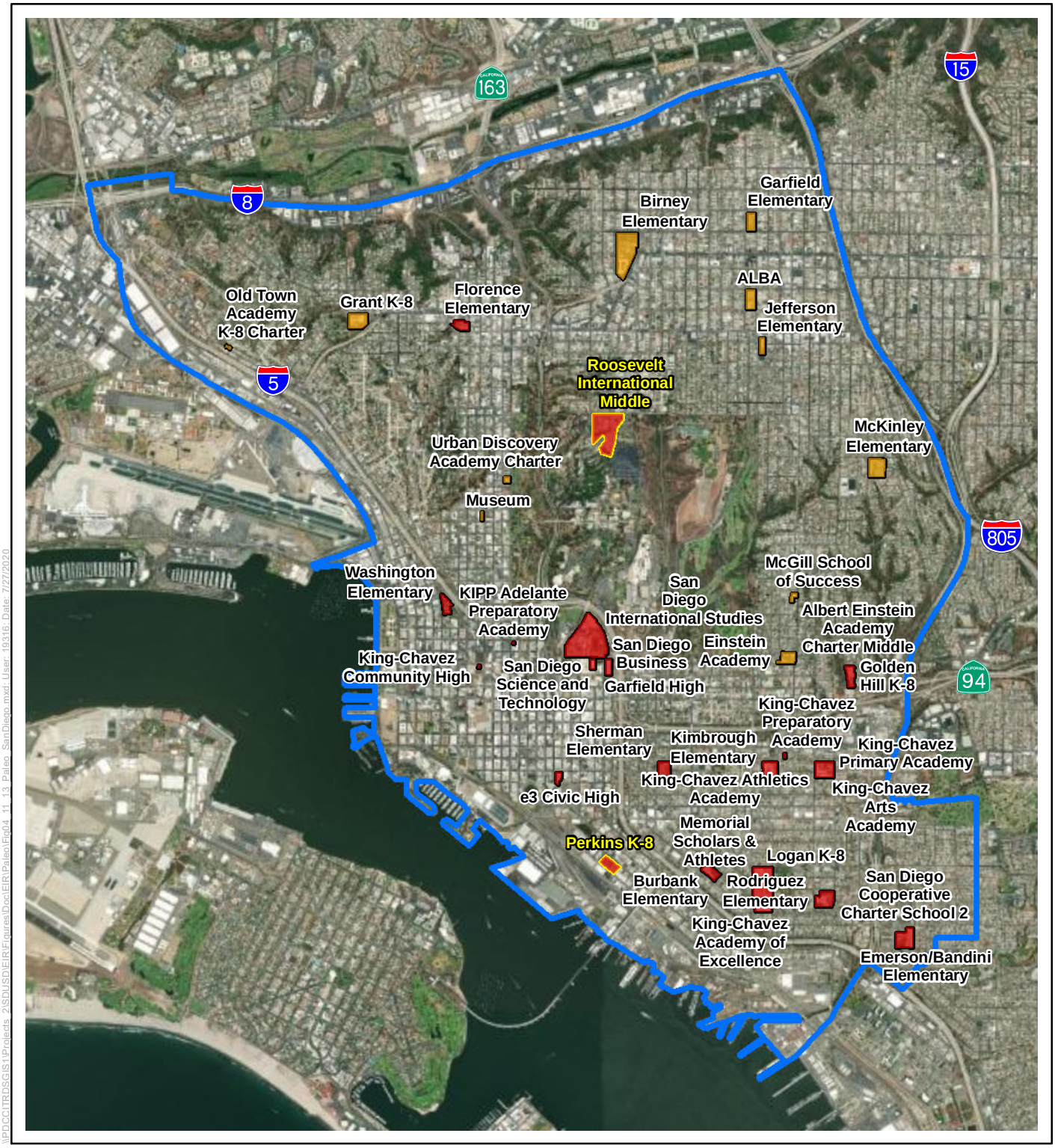
ICF

N

0 0.25 0.5 Miles

**Figure 4.11-12**
**Paleontological Resources - Point Loma Cluster Area**

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**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High

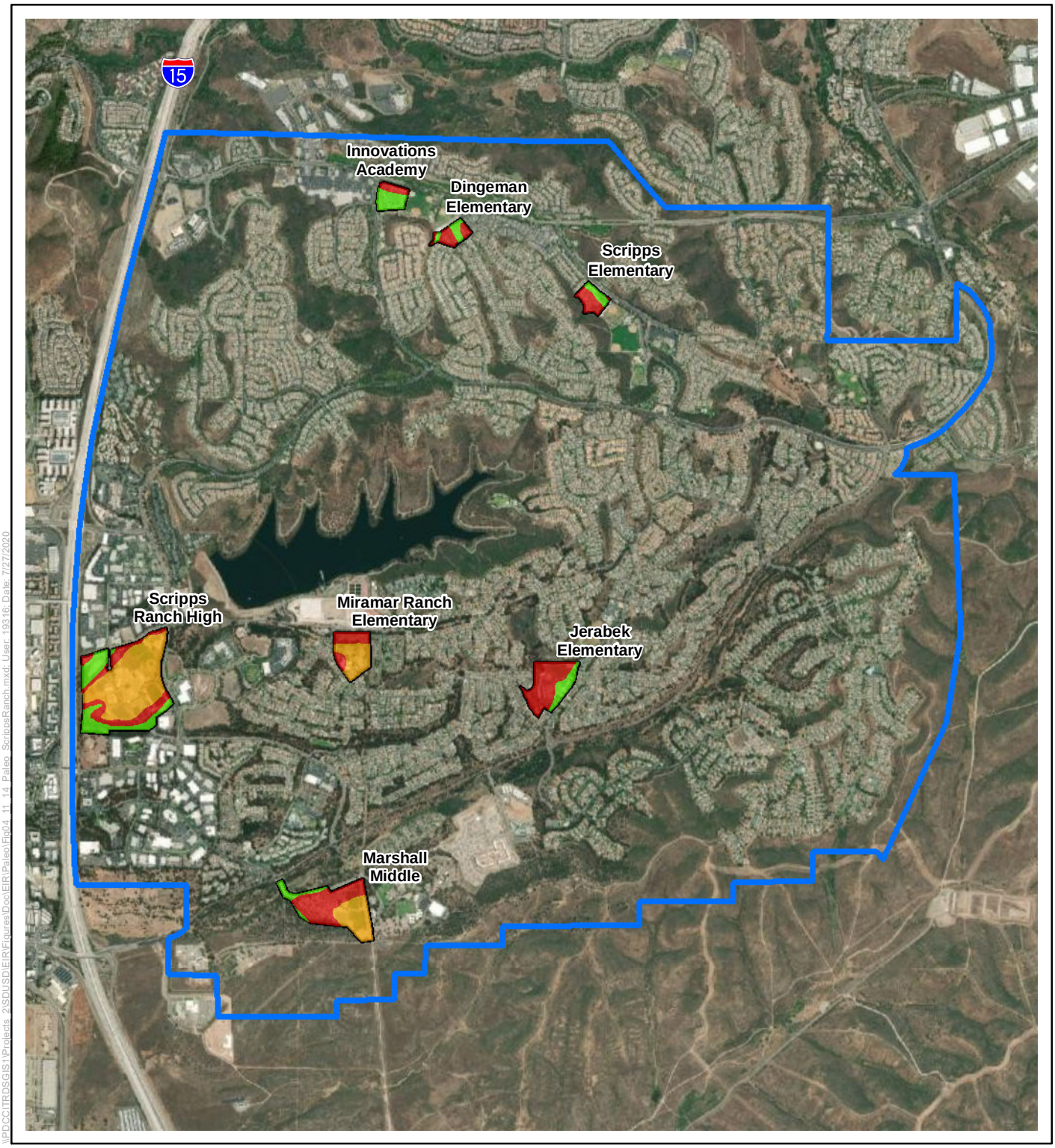



Source: SDNHM (2020)

0 0.25 0.5 Miles

N

**Figure 4.11-13**
**Paleontological Resources - San Diego Cluster Area**



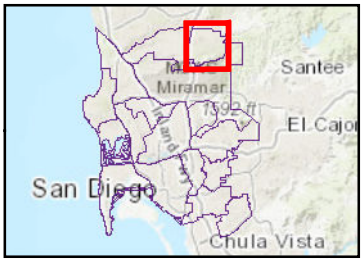

\\PDC\ITDSGIS1\Projects_2\SDUSD\EIR\Figures\Post\EIR\PaleoFig\04_11_14_Paleo_ScrippsRanch.mxd; User: 19316; Date: 7/27/2020

**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High



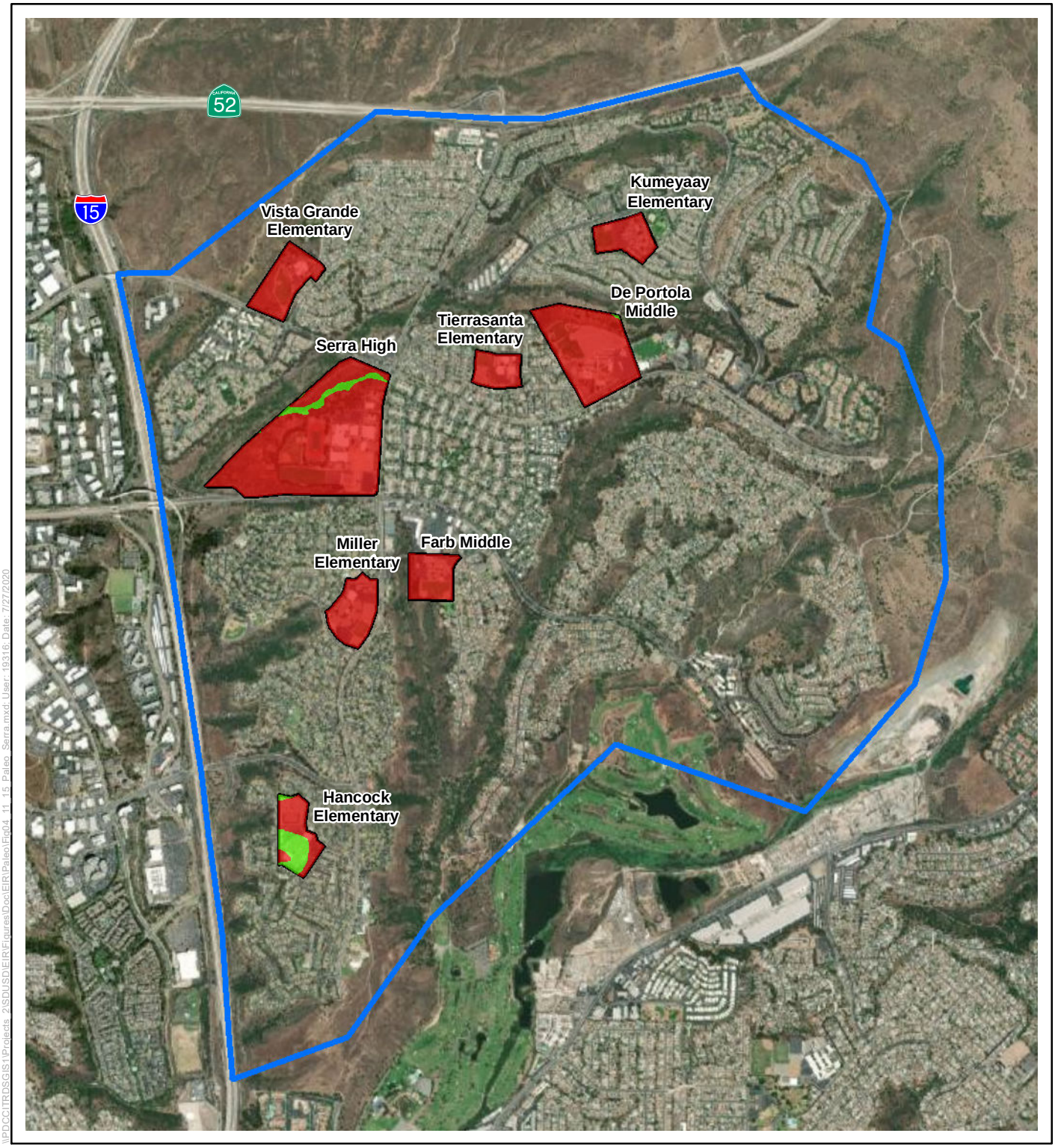

Source: SDNHM (2020)

ICF

N

0 0.25 0.5 Miles

**Figure 4.11-14**
**Paleontological Resources - Scripps Ranch Cluster Area**




**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High



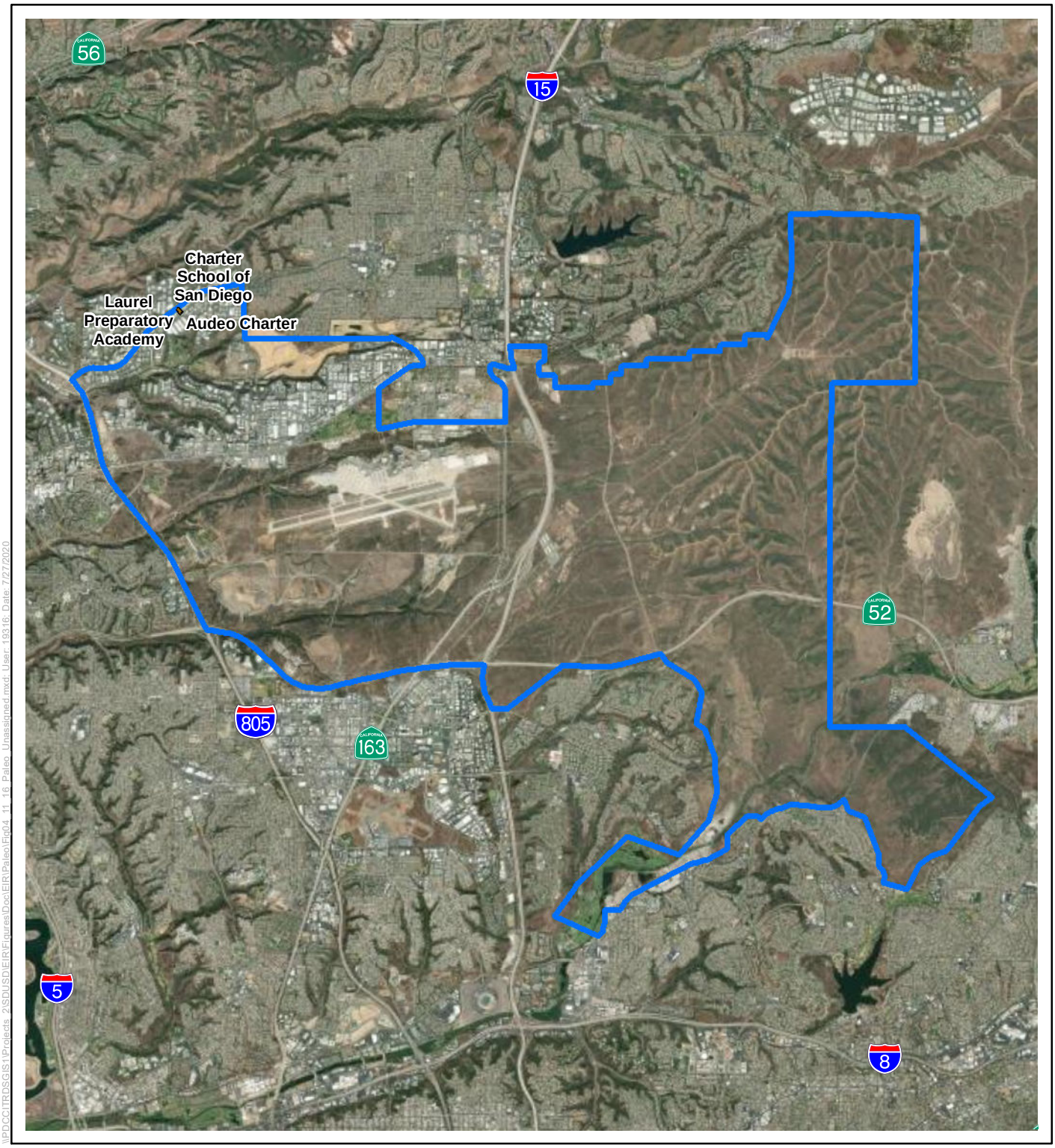

Source: SDNHM (2020)

ICF

N

0 0.25 0.5 Miles

**Figure 4.11-15**
**Paleontological Resources - Serra Cluster Area**




\\PDC\GTRDSGIS1\Projects_2\SDUSD\EIR\Figures\DocsEIR\PaleoFig04_11_16_Paleo_Unassigned.mxd User: 19316 Date: 7/27/2020

**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High



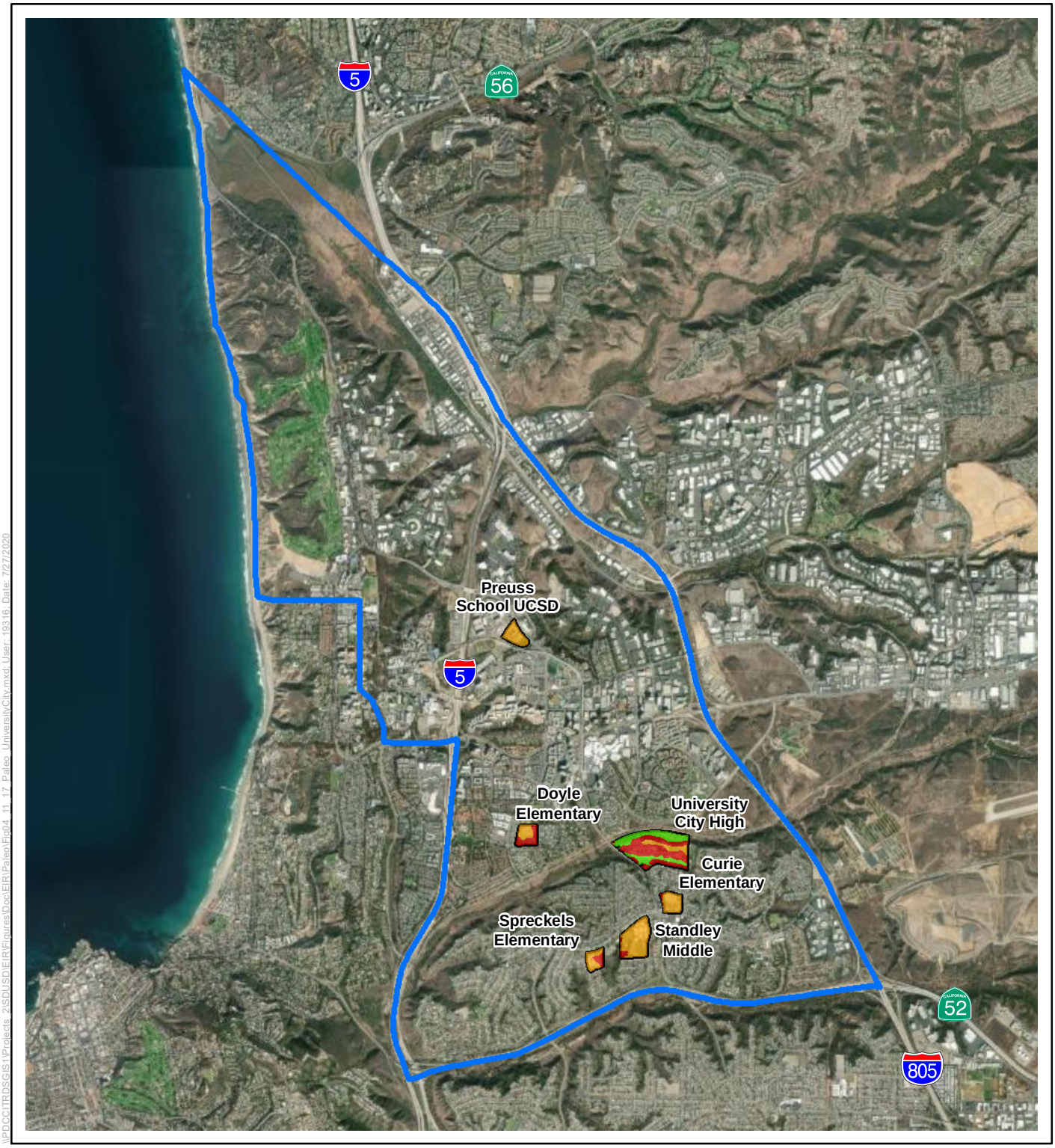

Source: SDNHM (2020)

ICF

N

0 0.5 1 Miles

**Figure 4.11-16**
**Paleontological Resources - Unassigned Cluster Area**




**Legend**

- Cluster Area Boundary
- School – Program Level
- School - Site-Specific Whole Site Modernization Project

Paleo Potential

- Zero
- Low
- Moderate
- High




Source: SDNHM (2020)

ICF

N

0 0.25 0.5 Miles

**Figure 4.11-17**
**Paleontological Resources - University City Cluster Area**

**Table 4.11-2. Paleontological Sensitivity Ratings of Geologic Units Underlying District Facilities**

| Geologic Unit | Location within District | Paleontological Sensitivity Rating |
|---|---|---|
| Artificial fill (af) | All communities where this unit occurs | Low |
| Late Quaternary alluvium (Qya) | All communities where this unit occurs | Low |
| Quaternary landslide deposits (Qls) | All communities where this unit occurs | Low |
| Pleistocene river terrace deposits (Qoa) | All communities where this unit occurs | Moderate |
| Bay Point Formation (Qop) | All communities where this unit occurs | High |
| Lindavista Formation (Qvop) | A. Mira Mesa/Tierrasanta<br>B. All other areas | A. High<br>B. Moderate |
| San Diego Formation (Tsd) | All communities where this unit occurs | High |
| Otay Formation (To) | All communities where this unit occurs | High |
| "Sweetwater" Formation (Tsw) | All communities where this unit occurs | High |
| Pomerado Conglomerate (Tp) | A. Scripps Ranch/Tierrasanta<br>B. All other areas | A. High<br>B. Moderate |
| Mission Valley Formation (Tmv) | All communities where this unit occurs | High |
| Stadium Conglomerate (Tst) | All communities where this unit occurs | High |
| Friars Formation (Tf) | All communities where this unit occurs | High |
| Scripps Formation (Tsc) | All communities where this unit occurs | High |
| Ardath Shale (Ta) | All communities where this unit occurs | High |
| Cabrillo Formation (Kc) | All communities where this unit occurs | Moderate |
| Santiago Peak Volcanics (Mzu) | A. Black Mountain Ranch/La Jolla Valley/Fairbanks Ranch/Mira Mesa/ Penasquitos<br>B. All other areas | A. Moderate<br>B. Zero |

## High Sensitivity

The existing District schools and administrative sites that are at least partially underlain by geologic units with high paleontological sensitivity are summarized in Table 4.11-3. If the facility is also partially underlain by a geologic unit with moderate paleontological sensitivity, it is listed in brackets. The schools listed in this table only include those on District-owned property.

**Table 4.11-3. District Facilities with High Paleontological Sensitivity**

| Facility Name | Cluster | Geologic Unit(s)[1] High [Moderate] | Fossil Collection Locality[2] |
|---|---|---|---|
| Alcott Elementary | Clairemont | Tsc [Qvop] | No |
| Audubon K-8 | Morse | Tmv [Qvop] | No |
| Baker Elementary | Lincoln | Qop | No |
| Balboa Elementary | Lincoln | Qop | No |
| Bay Park Elementary | Clairemont | Qop | No |
| Bell Middle | Morse | Tsd, To, Tmv | No |
| Benchley/Weinberger Elementary | Henry | Tmv | No |
| Bethune K-8 | Morse | Tmv | No |
| Bird Rock Elementary | La Jolla | Qop | No |
| Boone Elementary | Morse | Tsd, To | No |
| Burbank Elementary | San Diego | Qop | No |
| Cabrillo Elementary | Point Loma | Qop | No |
| Cadman Elementary | Clairemont | Ta [Qvop] | No |
| Carver Elementary | Crawford | Tsd [Qvop] | No |
| Challenger Middle | Mira Mesa | Qvop, Tf | No |
| Chavez Elementary | Lincoln | Qop | No |
| Chollas/Mead Elementary | Lincoln | Tsd [Qvop] | No |
| Clairemont High | Clairemont | Tsc, Ta [Qvop] | No |
| Clay Elementary | Crawford | Tsd [Qvop] | No |
| Correia Middle | Point Loma | Qop | No |
| Crawford High | Crawford | Tsd, Tmv [Tp] | No |
| Creative, Performing, and Media Arts | Madison | Tf [Qvop] | No |
| Crown Point Junior Music Academy | Mission Bay | Qop | No |
| Cubberley Elementary | Kearny | Tmv, Tst [Qvop] | No |
| Curie Elementary | University City | Tsc [Qvop] | No |
| Dailard Elementary | Henry | Tmv, Tst, Tf | No |
| Dana | Point Loma | Qop [Qvop, Kc] | No |
| Darnall Charter | Crawford | Tsd [Qvop] | No |
| De Portola Middle | Serra | Qvop, Tst, Tf | No |
| Dingeman Elementary | Scripps Ranch | Tf | No |
| Doyle Elementary | University City | Tsc [Qvop] | No |
| Emerson/Bandini Elementary | San Diego | Qop | No |
| Encanto Elementary | Lincoln | Tmv | No |
| Ericson Elementary | Mira Mesa | Qvop | No |
| Farb Middle | Serra | Qvop, Tst, Tf | No |
| Fay Elementary | Crawford | Tmv/Tsw | Yes (within site), Tsw |
| Field Elementary | Madison | Tsc [Qvop] | No |
| Fletcher Elementary | Kearny | Tmv [Qvop] | No |
| Florence Elementary | San Diego | Tsd [Qvop] | Yes, Tsd |

| Facility Name | Cluster | Geologic Unit(s)[1] High [Moderate] | Fossil Collection Locality[2] |
|---|---|---|---|
| Freese Elementary | Morse | Tsd [Qvop] | No |
| Fulton K-8 | Morse | Tsd, To | No |
| Gage Elementary | Henry | Tmv | No |
| Garfield High | San Diego | Qop, Tsd [Qvop] | Yes, Tsd |
| Golden Hill K-8 | San Diego | Tsd | No |
| Grant K-8 | San Diego | Tsd [Qvop] | Yes (within site), Tsd |
| Green Elementary | Henry | Tmv | No |
| Hage Elementary | Mira Mesa | Qvop | No |
| Hamilton Elementary | Hoover | Tsd [Qvop] | No |
| Hancock Elementary | Serra | Qvop, Tst, Tf | No |
| Hardy Elementary | Henry | Tsd, Tmv [Qvop] | No |
| Henry High | Henry | Tmv, Tst | No |
| Hickman Elementary | Mira Mesa | Qvop | No |
| Holly Drive Leadership Academy | Lincoln | Tsd [Qvop] | No |
| Holmes Elementary | Clairemont | Tf, Tsc [Qvop] | No |
| Horton Elementary | Lincoln | Tsd [Qvop] | No |
| Iftin Charter | Crawford | Tsd [Qvop, Tp] | Yes, Tsd |
| Ingenuity Charter | Lincoln | To, Tmv | No |
| Innovations Academy | Scripps Ranch | Tf | Yes, Tf |
| Jerabek Elementary | Scripps Ranch | Tf | No |
| John Muir | Clairemont | Tf [Qvop] | No |
| Johnson Elementary | Lincoln | Tmv | No |
| Jonas Salk Elementary | Mira Mesa | Qvop, Tf | No |
| Joyner Elementary | Hoover | Tsd [Qvop] | No |
| Kavod Elementary Charter | Kearny | Tmv, Tst [Qvop] | No |
| Kearny HS Complex | | | |
| Keiller Leadership Academy | Morse | Tmv | No |
| Kimbrough Elementary | San Diego | Qop, Tsd | No |
| King-Chavez Academy of Excellence | San Diego | Qop | No |
| King-Chavez Arts, Athletics and Primary 3-5 | San Diego | Qop | No |
| King-Chavez Preparatory Academy | San Diego | Tsd | No |
| Kumeyaay Elementary | Serra | Qvop, Tsd, Tst, Tf | Yes (within site), Tsd |
| La Jolla Elementary | La Jolla | Ta | No |
| La Jolla High | La Jolla | Qop, Ta | Yes (within site), Ta |
| Pacific View Leadership ES | Morse | Tsd, To [Qvop] | Yes, Tsd |
| Lewis Middle | Henry | Tf [Qvop] | No |
| Logan K-8 | San Diego | Qop | No |
| Loma Portal Elementary | Point Loma | Qop | No |
| Magnolia Science Academy San Diego | Henry | Tmv | No |
| Mann Middle | Crawford | Tsd [Qvop, Tp] | Yes, Tsd |

| Facility Name | Cluster | Geologic Unit(s)[1] High [Moderate] | Fossil Collection Locality[2] |
|---|---|---|---|
| Marshall Elementary | Crawford | Tsd [Qvop] | No |
| Marshall Middle | Scripps Ranch | Tf [Qvop] | No |
| Marvin Elementary | Henry | Tf [Qvop] | No |
| Mason Elementary | Mira Mesa | Qvop | No |
| Memorial Prep | San Diego | Qop | No |
| Miller Elementary | Serra | Qvop, Tst | No |
| Mira Mesa High | Mira Mesa | Qvop | No |
| Miramar Ranch Elementary | Scripps Ranch | Tf [Qvop] | No |
| Morse High | Morse | Tsd, To, Tmv | No |
| Muirlands Middle | La Jolla | Ta | Yes, Ta |
| Nye Elementary | Lincoln | Tsd, To, Tmv [Qvop] | No |
| Oak Park Elementary | Crawford | Tsd [Qvop] | No |
| Ocean Beach Elementary | Point Loma | Qop | No |
| Pacific Beach Elementary | Mission Bay | Qop | No |
| Pacific Beach Middle | Mission Bay | Qop | No |
| Penn Elementary | Morse | Tsd, To, Tmv | No |
| Perkins K-8 | San Diego | Qop | No |
| Perry Elementary | Morse | Tsd | No |
| Pershing Middle | Henry | Tmv, Tst | No |
| Point Loma High | Point Loma | Qop [Kc] | No |
| Riley K-12 | Clairemont | Tf [Qvop] | No |
| Rodriguez Elementary | San Diego | Qop | No |
| Rolando Park Elementary | Crawford | Tsd, Tmv [Qvop] | No |
| Roosevelt Middle | San Diego | Tsd [Qvop] | Yes (within site), Tsd |
| Rowan Elementary | Hoover | Tsd | No |
| San Diego Cooperative Charter School | Kearny | Qop | No |
| San Diego HS Complex | San Diego | Tsd | Yes, Tsd |
| San Diego SCPA | Morse | Tsd, To, Tmv | No |
| Sandburg Elementary | Mira Mesa | Qvop | No |
| Scripps Elementary | Scripps Ranch | Tmv, Tf | No |
| Scripps Ranch High | Scripps Ranch | Tf [Qvop] | No |
| Serra High | Serra | Qvop, Tst, Tf | No |
| Sessions Elementary | Mission Bay | Tsd | No |
| Sherman Elementary | San Diego | Qop, Tsd | Yes, Qop |
| Spreckels Elementary | University City | Tsc [Qvop] | No |
| Standley Middle | University City | Tsc [Qvop] | No |
| Taft Middle | Kearny | Tmv, Tst [Qvop] | No |
| O'Farrell Community | Lincoln | To, Tmv | No |
| Tierrasanta Elementary | Serra | Qvop, Tf | Yes, Qvop |
| Toler Elementary | Clairemont | Qop, Ta | No |
| Torrey Pines Elementary | La Jolla | Tsc, Ta [Qvop] | No |

| Facility Name | Cluster | Geologic Unit(s)[1] High [Moderate] | Fossil Collection Locality[2] |
|---|---|---|---|
| Twain Main High | Kearny | Tf, Tsc [Qvop] | No |
| University City High | University City | Tsc [Qoa, Qvop] | No |
| Valencia Park Elementary | Lincoln | Tsd, Tmv [Qvop] | No |
| Vista Grande Elementary | Serra | Qvop, Tf | No |
| Walker Elementary | Mira Mesa | Qvop | No |
| Wangenheim Middle | Mira Mesa | Qvop, Tf | No |
| Washington Elementary | San Diego | Qop | Yes, Tsd |
| Webster Elementary | Lincoln | Tsd [Qvop] | No |
| Zamorano Elementary | Morse | To, Tmv/Tsw | No |

Sources: Geologic mapping by Kennedy and Tan (2008); unpublished SDNHM paleontological collections data.

[1] Geologic units are abbreviated as follows: Kc=Cabrillo Formation, Qoa=Pleistocene river terrace deposits, Qop=Bay Point Formation, Qvop=Lindavista Formation, Ta=Ardath Shale, Tf=Friars Formation, Tmv=Mission Valley Formation, To=Otay Formation, Tp=Pomerado Conglomerate, Tsc=Scripps Formation, Tsd=San Diego Formation, Tst=Stadium Conglomerate, Tsw="Sweetwater" Formation.

[2] Denotes existing District facilities on or within 100 feet of a fossil collection locality. If yes, the formation from which the fossils originated is noted.

## Moderate Sensitivity

The existing District schools and administrative sites that are at least partially underlain by geologic units with moderate paleontological sensitivity are summarized in Table 4.11-4. The schools listed in this table only include those on District-owned property.

**Table 4.11-4. District Facilities with Moderate Paleontological Sensitivity**

| Facility Name | Cluster | Geologic Unit(s)[1] | Fossil Collection Locality[2] |
|---|---|---|---|
| Adams Elementary | Hoover | Qvop | No |
| ALBA | San Diego | Qvop | No |
| Albert Einstein Academy Middle | San Diego | Qvop | No |
| America's Finest Charter | Lincoln | Qvop | No |
| Angier Elementary | Kearny | Qvop | No |
| Birney Elementary | San Diego | Qvop | No |
| Carson Elementary | Kearny | Qvop | No |
| Central Elementary | Hoover | Qvop | No |
| Cherokee Point Elementary | Hoover | Qvop | No |
| Chesterton Elementary | Kearny | Qvop | No |
| Clark Middle | Hoover | Qvop | No |
| Edison Elementary | Hoover | Qvop | No |
| Albert Einstein Academy Elementary | San Diego | Qvop | No |
| Empower K-6 Charter | Kearny | Qvop | No |
| Euclid Elementary | Crawford | Qvop | No |
| Foster Elementary | Henry | Qoa, Qvop | No |
| Franklin Elementary | Hoover | Qvop | No |

| Facility Name | Cluster | Geologic Unit(s)[1] | Fossil Collection Locality[2] |
|---|---|---|---|
| Gompers Prep | Lincoln | Qvop | No |
| Tubman Village Charter | Crawford | Qvop | No |
| Hawthorne Elementary | Madison | Qvop | No |
| Health Sciences High and Middle | Hoover | Qvop | No |
| Hoover High | Hoover | Qvop | No |
| Ibarra Elementary | Crawford | Qvop | No |
| Innovation Middle | Madison | Qvop | No |
| Jefferson Elementary | San Diego | Qvop | No |
| Jones Elementary | Kearny | Qvop | No |
| Juarez Elementary | Kearny | Qvop | No |
| Knox Middle | Lincoln | Qvop | No |
| Lafayette Elementary | Madison | Qvop | No |
| Language Academy K-8 | Henry | Qvop | No |
| Lincoln High | Lincoln | Qvop | No |
| Linda Vista Elementary | Kearny | Qvop | No |
| Lindbergh/Schweitzer Elementary | Madison | Qvop | No |
| Longfellow K-8 | Clairemont | Qvop | No |
| Madison High | Madison | Qvop | No |
| Marston Middle | Clairemont | Qvop | No |
| McKinley Elementary | San Diego | Qvop | No |
| Millennial Tech Middle | Lincoln | Qvop | No |
| Montgomery Middle | Kearny | Qvop | No |
| Mt. Everest Academy | Clairemont | Qvop | No |
| Normal Heights Elementary | Hoover | Qvop | No |
| Paradise Hills Elementary | Morse | Qvop | No |
| Porter Elementary | Lincoln | Qvop | No |
| Rosa Parks Elementary | Hoover | Qvop | No |
| Ross Elementary | Kearny | Qvop | No |
| Rowan Elementary | Hoover | Qvop | No |
| San Diego Cooperative Charter | Kearny | Qvop | No |
| San Diego Global Vision Academy TK-8 | Hoover | Qvop | No |
| Sequoia Elementary | Madison | Qvop | No |
| Silver Gate Elementary | Point Loma | Qvop | No |
| Sunset View Elementary | Point Loma | Qvop | No |
| Wegeforth Elementary | Kearny | Qvop | No |
| Whitman Elementary | Madison | Qvop | No |
| Whittier K-12 | Clairemont | Qvop | No |
| Wilson Middle | Hoover | Qvop | No |

Sources: Geologic mapping by Kennedy and Tan (2008); unpublished SDNHM paleontological collections data.

[1] Geologic units are abbreviated as follows: Qoa=Pleistocene river terrace deposits, Qvop=Lindavista Formation.

[2] Denotes existing District facilities on or within 100 feet of a fossil collection locality. If yes, the formation from which the fossils originated is noted.

### No or Low Sensitivity

The existing District schools and administrative sites that are entirely underlain by geologic units with no or low paleontological sensitivity are summarized in Table 4.11-5. The schools in this table only include those on District-owned property.

**Table 4.11-5. District Facilities with No or Low Paleontological Sensitivity**

| Facility Name | Cluster | Geologic Unit(s)[1] | Fossil Collection Locality[2] |
|---|---|---|---|
| Barnard Asian Pacific Language Academy | Mission Bay | af | No |
| Dewey Elementary | Point Loma | af | No |
| Hearst Elementary | Henry | Mzu | No |
| Mission Bay High | Mission Bay | af | No |

Sources: Geologic mapping by Kennedy and Tan (2008); unpublished SDNHM paleontological collections data.

[1] Geologic units are abbreviated as follows: af=artificial fill, Mzu=Santiago Peak Volcanics.

[2] Denotes existing District facilities on or within 100 feet of a fossil collection locality.

# 4.11.3 Applicable Laws and Regulations

## 4.11.3.1 Local

California Government Code Section 53094 includes provisions for school districts to exempt specific school facilities from local zoning regulations. However, because the District does not have specific thresholds for paleontological resources, and CEQA does not provide criteria for paleontological resources, the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego 2016) will be used for determining the significance of paleontological resources impacts. The City's Significance Determination Thresholds define when significant impacts on paleontological resources could occur and identifies when paleontological monitoring is required.

# 4.11.4 Impact Analysis

## 4.11.4.1 Methodology

Because fossils are buried and preserved in sedimentary rock layers (strata), they are vulnerable to destructive processes of both natural weathering and erosion as well as manmade earthmoving operations. Impacts on paleontological resources may occur during grading activities associated with project construction, especially for large-scale excavations (e.g., new campus construction, roadway projects) and possibly in campus redevelopment projects (e.g., for subsurface parking structures, deep utility installation), where excavation would take place in previously undisturbed deposits of certain formations/geologic units that are assigned a high or moderate paleontological sensitivity.

Potential direct and indirect impacts on paleontological resources were determined using the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego 2016). The City of San Diego's Thresholds were developed based on consultation with experts from SDNHM who have

detailed knowledge of the location of paleontological resources within the San Diego County region. These thresholds provide quantitative metrics for distinguishing between impacts on paleontological resources that are significant (i.e., impact exceeds the quantitative threshold of significance) and those that are typically less than significant. If an impact exceeds the quantitative threshold of significance, mitigation measures are required, where feasible.

## 4.11.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining the significance of impacts on paleontological resources resulting from the Proposed Program. The determination of whether a paleontological resources impact would be significant is based on the thresholds described below and the professional judgment of the District as Lead Agency, supported by the recommendations of qualified personnel at ICF, and is based on the evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following.

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

To assist in determining the significance of the Proposed Program's impact on paleontological resources, the District will utilize the City of San Diego's CEQA Significance Determination Thresholds. An answer in the affirmative to any of these questions would indicate that significant impacts on paleontological resources would occur and mitigation would be required to reduce these impacts to less-than-significant levels. No known unique geologic features are located within the city of San Diego (County of San Diego 2007). Therefore, unique geologic features require no further analysis and are not discussed under Section 4.11.4.3 below.

Would the project:

1. Require over 1,000 cubic yards of excavation and excavation extending over 10 feet deep in an area underlain by a geologic unit considered to have high paleontological sensitivity?
2. Require over 2,000 cubic yards of excavation and excavation extending over 10 feet deep in an area underlain by a geologic unit considered to have moderate paleontological sensitivity?
3. Require any amount of grading on a fossil collection locality or within 100 feet of a documented fossil collection locality?

The above depth threshold of 10 feet was developed by the City of San Diego in consideration of the fact that modern soils and surface weathering processes often destroy fossils within 10 feet of the existing ground surface. However, in cases where prior construction-related earthwork activities (e.g., mass grading) have occurred (e.g., existing school campuses), the depth threshold may be greater than 10 feet (where artificial fill is present to depths greater than 10 feet below grade) or less than 10 feet (where previously undisturbed/unweathered formation is present at or near grade). In addition, the City of San Diego recognizes that in certain situations the depth threshold should be modified—, for example, in cases where a project site has been previously graded and/or unweathered geologic deposits/ formations/rock units are present at the surface. Such a determination is usually based on the results of a project-specific geotechnical investigation, where available. Existing conditions within a given District facility site may be more accurately determined by a site-specific geotechnical investigation, where available.

Unless on or within 100 feet of a recorded fossil collection locality, no monitoring is required in areas with no or low paleontological sensitivity because there is no potential for impacts on paleontological resources to occur. As such, the analysis below only focuses on areas with moderate or high paleontological sensitivity.

# 4.11.4.3 Impacts and Mitigation Measures

***Threshold 1: Would implementation of the Proposed Program directly or indirectly destroy a unique paleontological resource or site?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

***Construction***

As discussed in Section 4.11.2.4, *Paleontological Sensitivity,* nearly all existing District school and administrative facilities are underlain by formations/geologic units with high and/or moderate paleontological sensitivity (see Tables 4.11-3 and 4.11-4, respectively). In addition, several school sites are on or within 100 feet of documented fossil collection localities (see Tables 4.11-3 and 4.11-4). Based on the wide distribution of fossil-bearing geologic units in the city of San Diego, it is also considered likely that new sites identified for acquisition and school or administrative facilities construction would be underlain by geologic units with high and/or moderate paleontological sensitivity.

The primary type of activities that directly destroy a unique paleontological resource or site are ground-disturbing activities. Activities that indirectly destroy unique paleontological resources typically include creating new points of access to a previously undeveloped area that increases visitation, potentially allowing for rock or fossil hunting.

New acquisition would be an administrative procedure and would not directly result in any physical changes to the environment. However, once the site has been acquired, the construction of a new school or administrative facility on that site would result in physical changes that could have significant environmental effects. Construction of new school or administrative facilities would require a substantial amount of ground-disturbing activities in order to grade and level the site, install building footings and wet and dry utilities, excavate for pools or athletic fields or stadiums, and other activities. Excavation associated with these activities would likely extend to depths of 10 feet or greater. Therefore, construction activities could damage or destroy previously undiscovered paleontological resources should ground-disturbing activities extend to depths of 10 feet or greater below existing surface grade and require more than 1,000 cubic yards or 2,000 cubic yards of excavation if the new school site is underlain by a geologic units with high or moderate paleontological sensitivity, respectively.

In addition, if a new school or administrative facility is on or within 100 feet of a documented fossil collection locality, any ground-disturbing activities during construction could result in significant impacts on these resources. Documented fossil collection localities are areas known to contain paleontological resources that could be irreversibly destroyed by ground-disturbing activities, thus

eliminating their possible use in scientific studies and educational outreach. Therefore, construction activities associated with new school or administrative facilities projects would have the potential to result in significant impacts on paleontological resources (**Impact-PAL-1**).

With implementation of **MM-PAL-1** and **MM-PAL-2**, **Impact-PAL-1** would be reduced to less-than-significant levels because future projects would be required to screen for grading quantities and paleontological sensitivity and the recommended monitoring of any ground-disturbing activities that extend 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site. Therefore, impacts associated with this project category would be less than significant with mitigation incorporated.

***Operation***

Operational activities associated with new school or administrative facilities projects would not involve ground disturbance or other activities that could affect paleontological resources. In addition, new school or administrative facilities would be located in already developed areas and their operation would not encourage human encroachment into previously undeveloped areas. Therefore, operations associated with new school or administrative facilities projects would not directly or indirectly destroy unique paleontological resources or fossil collection localities. No impact would occur.

### Level of Significance Prior to Mitigation

***Construction***

**Impact-PAL-1: Potential to Disturb Buried Paleontological Resources During New Acquisition and New School or Administrative Facilities Projects.** Reasonably foreseeable construction activities associated with new acquisition and new school or administrative facilities projects have the potential to significantly affect paleontological resources as a result of any ground-disturbing activities extending 10 feet or more below existing surface grade and requiring more than 1,000 cubic yards of excavation within a high sensitivity geologic unit and/or more than 2,000 cubic yards of excavation within a moderate sensitivity geologic unit. In addition, if a new school or administrative facility site would be located on or within 100 feet of a documented fossil collection locality, any ground-disturbing activities during construction would potentially result in significant impacts on these resources regardless of depth and/or volume thresholds. This is a potentially significant impact.

***Operation***

Operational activities associated with new school or administrative facilities would not involve ground-disturbing activities and would result in no impacts on paleontological resources.

### Mitigation Measures

For **Impact- PAL-1**:

**MM-PAL-1: Conduct Grading and Paleontological Sensitivity Screening**

1. For new acquisition and new school or administrative facilities projects, a paleontological records search should be conducted to determine (1) whether any high or moderate sensitivity geologic units underlie the project site (following City of San Diego, 2016) and (2)

whether there are documented fossil collection localities present within the site or within 100 feet of the site. If either of these are answered in the affirmative, proceed to Step 2. If not, no further action is required.

For District facility improvement projects, consult Tables 4.11-3 to 4.11-5 presented in this report. If the existing District facility is underlain by high or moderate sensitivity geologic units or if documented fossil collection localities are present within the site or within 100 feet of the site, proceed to Step 2. If it is entirely underlain by low or no sensitivity geologic units and there are no documented fossil collection localities nearby, no further action is required.

2. Compare project grading plans and the paleontological resource geographic information system (GIS) database (or paleontological records search results, for new acquisition and new school or administrative facilities projects), and project geotechnical report (if available). Determine whether the distribution of high/moderate sensitivity geologic units overlaps with construction plans, and what volume/depths will be affected. Determine whether a depth threshold other than 10 feet should be used for the project (see discussion under Impact-PAL-2). Otherwise, a standard depth threshold of 10 feet should be used. Based on comparison of these documents, will a high or moderate sensitivity geologic unit be affected by construction of the project? If yes, proceed to Step 3. If no (e.g., only artificial fill will be affected), no further action is required.
3. Determine whether volume and project-specific depth thresholds will be exceeded during project construction. Volume thresholds are greater than 1,000 cubic feet in areas underlain by high sensitivity geologic units and greater than 2,000 cubic feet in areas underlain by moderate sensitivity geologic units. The project-specific depth threshold was determined in Step 2. If both volume and depth thresholds for a project will be exceeded, **MM-PAL-2** should be implemented. If not, no further action is required.

**MM-PAL-2: Conduct Paleontological Monitoring in Areas of High or Moderate Sensitivity**

Where the above screening (**MM-PAL-1**) indicates that project construction would result in significant impacts on paleontological resources, **MM-PAL-2** shall be implemented to reduce these potential impacts to less-than-significant levels. Specifically, the District and/or its construction supervisor shall ensure the following measures are implemented**:**

- A qualified paleontologist shall be retained to oversee the mitigation program.
    - A qualified paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or geology who is familiar with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology of San Diego County, and who has worked as a paleontological mitigation project supervisor in the county for at least 1 year.

  In addition, a regional fossil repository shall be designated to receive any discovered fossils.

    - A fossil repository is defined as a scientific institution with permanent paleontological collections. Because the District lies within San Diego County, the recommended repository is San Diego Natural History Museum.

- The qualified paleontologist shall attend the preconstruction meeting to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues.
- A paleontological monitor (working under the direction of the qualified paleontologist) shall be on site on a full-time basis during initial excavation activities that are anticipated to affect high or moderate paleontological sensitivity geologic units to inspect exposures for contained fossils. The project-specific depth threshold should be used to determine where monitoring is required.
    - A paleontological monitor is defined as an individual selected by the qualified paleontologist who has experience in the collection and salvage of fossil materials.

  Paleontological monitoring may be reduced (e.g., to part-time monitoring or spot-checking) or eliminated at the discretion of the qualified paleontologist and in consultation with appropriate agencies. Changes to the paleontological monitoring schedule shall be based on the results of the mitigation program as it unfolds during site development, and actual and anticipated conditions in the field.
- If fossils are discovered, the qualified paleontologist (or paleontological monitor) shall recover them and temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner.
- Fossil remains collected during the monitoring and salvage portion of the mitigation program shall be cleaned, repaired, sorted, and catalogued.
- Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in the designated fossil repository. Donation of the fossils shall be accompanied by financial support for initial specimen storage, paid for by the project proponent.

Within 90 days of the completion of all ground-disturbing construction activities and fossil preparation and curation work (if fossils are discovered), a final paleontological mitigation report shall be completed by the qualified paleontologist that summarizes the results of the mitigation program. This report shall include discussions of the methods used and stratigraphic section(s) exposed, as well as fossils collected and significance of recovered fossils (if fossils are discovered and recovered).

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with new school or administrative facilities would have the potential to significantly affect paleontological resources as a result of any ground-disturbing activities. With implementation of **MM-PAL-1** and **MM-PAL-2**, **Impact-PAL-1** would be reduced to a less-than-significant level because future projects would be required to screen for grading quantities and paleontological sensitivity, and the recommended monitoring of any ground-disturbing activities that extend 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site. Therefore, impacts associated with new acquisition and new school or administrative facilities would be less than significant with mitigation incorporated.

***Operation***

Operational activities associated with new acquisition and new school or administrative facilities would not involve ground-disturbing activities and would not result in impacts on paleontological resources.

## Whole Site Modernization and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

***Construction***

Whole site modernization and joint-use facilities projects would involve varying levels of ground disturbance. Generally, whole site modernization projects would involve redevelopment of existing District facilities and could include the demolition of existing buildings and construction of new replacement buildings, which would require some level of ground disturbance. In addition, the development of new joint-use facilities such as athletic fields and pools would also require excavation. However, excavation for new joint-use athletic fields would typically be minimal, and therefore would not extend to depths likely to affect paleontological resources unless located on or within 100 feet of a documented fossil collection locality.

Therefor, whole site modernization and joint-use facilities development could include significant quantities of excavation. Construction activities could result in significant impacts on paleontological resources should they require more than 1,000 cubic yards of excavation at any of the sites listed in Table 4.11-3 (high sensitivity) or more than 2,000 cubic yards of excavation at any of the sites listed in Table 4.11-4 (moderate sensitivity), and exceed the appropriate depth threshold (less than 10 feet for sites where previously undisturbed formation has been exposed by prior grading of the site, or more than 10 feet for sites containing artificial fill to depths of greater than 10 feet) (**Impact-PAL-2**).

In addition, whole site modernization and joint-use facilities development projects have the potential to result in significant impacts on paleontological resources if located on or within 100 feet of a documented fossil collection locality, as indicated in Tables 4.11-3 through 4.11-5, because any ground-disturbing activities in these areas could damage paleontological resources (**Impact-PAL-3**).

With implementation of **MM-PAL-1 and MM-PAL-2, Impact-PAL-2** and **Impact-PAL-3** would be reduced to less-than-significant levels because future projects would be required to screen for grading quantities and paleontological sensitivity, and the recommended monitoring of any ground-disturbing activities that extend 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site. Therefore, impacts would be less than significant with mitigation incorporated.

***Operation***

Operational activities associated with whole site modernization and joint-use facilities development projects would not involve ground disturbance or other activities that could affect paleontological resources. In addition, operation of these project categories would occur in already developed areas and operational activities would not encourage human encroachment into previously undeveloped areas. Therefore, operations associated with these project categories would not directly or indirectly destroy unique paleontological resources or fossil collection localities. No impact would occur.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-PAL-2: Potential to Disturb Buried Paleontological Resources During Construction of Whole Site Modernization and Joint-Use Facilities Development Projects.** Reasonably foreseeable construction activities associated with whole site modernization and joint-use facilities development projects have the potential to significantly affect paleontological resources as a result of any ground-disturbing activities exceeding the appropriate depth threshold (less than 10 feet for sites where previously undisturbed strata been exposed by prior grading of the site, more than 10 feet for sites containing artificial fill to depths of greater than 10 feet, or when project-specific documentation/evidence [i.e., geotechnical reports, etc.] indicate a different depth threshold should be applied such as when surficial resources may exist) requiring more than 1,000 cubic yards of excavation within a high sensitivity formation and/or more than 2,000 cubic yards of excavation within a moderate sensitivity formation. This is a potentially significant impact.

**Impact-PAL-3: Potential to Disturb Fossil Collection Localities During Construction.** Reasonably foreseeable ground-disturbing construction activities associated with District facility improvement projects have the potential to significantly affect paleontological resources when the project is located on or within 100 feet of a documented fossil collection locality. This is a potentially significant impact.

#### *Operation*

Operations following whole site modernization or joint-use facilities development projects would not directly or indirectly destroy a unique paleontological resource or site. There would be no impacts.

### Mitigation Measures

For **Impact-PAL-2**, and **Impact-PAL-3**:

Implement **MM-PAL-1** and **MM-PAL-2**, as described above.

### Level of Significance After Mitigation

#### *Construction*

With implementation of **MM-PAL-1** and **MM-PAL-2**, **Impact-PAL-2** and **Impact-PAL-3** would be reduced to less-than-significant levels because future projects would be required to screen for grading quantities and paleontological sensitivity, and the recommended monitoring of any ground-disturbing activities that extend 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site. Therefore, impacts would be less than significant with mitigation incorporated.

#### *Operation*

Operations following whole site modernization or joint-use facilities development projects would not directly or indirectly destroy a unique paleontological resource or site. There would be no impacts.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Upgrades of existing school and administrative sites projects would involve varying levels of ground disturbance. However, excavation for upgrades of existing school and administrative sites would typically be minimal, and therefore would not extend to depths likely to affect paleontological resources unless located on or within 100 feet of a documented fossil collection locality.

Upgrades of existing school and administrative sites projects have the potential to result in significant impacts on paleontological resources if located on or within 100 feet of a documented fossil collection locality, as indicated in Tables 4.11-3 through 4.11-5, because any ground-disturbing activities in these areas could damage paleontological resources (**Impact-PAL-3**).

With implementation of **MM-PAL-2**, **Impact-PAL-3** would be reduced to a less-than-significant level because future projects would be required to conduct monitoring of any ground-disturbing activities in areas of high or moderate sensitivity. This would minimize the potential to affect a unique paleontological resource or site. Therefore, impacts would be less than significant with mitigation incorporated.

### Operation

Operational activities associated with upgrades of existing school and administrative sites would not involve ground disturbance or other activities that could affect paleontological resources. In addition, operation of this project category would occur in already developed areas and operations would not encourage human encroachment into previously undeveloped areas. Therefore, operations associated with upgrades of existing school and administrative facilities would not directly or indirectly destroy unique paleontological resources or fossil collection localities. No impact would occur.

## Level of Significance Prior to Mitigation

### Construction

**Impact-PAL-3: Potential to Disturb Fossil Collection Localities During Construction.** Reasonably foreseeable ground-disturbing construction activities associated with District facility improvement projects have the potential to significantly affect paleontological resources when the project is located on or within 100 feet of a documented fossil collection locality. This is a potentially significant impact.

## Mitigation Measures

For **Impact-PAL-3**:

Implement **MM-PAL-2**, as described above.

### Level of Significance After Mitigation

#### Construction

With implementation of **MM-PAL-2**, **Impact-PAL-3** would be reduced to a less-than-significant level because future projects would be required to conduct monitoring of any ground-disturbing activities in areas of high or moderate sensitivity. This would minimize the potential to affect a unique paleontological resource or site. Therefore, impacts would be less than significant with mitigation incorporated.

#### Operation

Operations following upgrades to existing school and administrative facilities would not directly or indirectly destroy a unique paleontological resource or site. There would be no impacts.

## Site-Specific Analysis

### Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.11-6. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the whole site modernization project category.

**Table 4.11-6. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 | 1770 Main Street (92113) |

| School | Location |
|---|---|
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019.

### Construction

Construction activities associated with the near-term, site-specific whole site modernization projects would involve varying levels of ground disturbance. These projects can include the demolition of existing buildings and construction of new replacement buildings, all of which would require some level of ground disturbance that could affect paleontological resources.

Near-term, site-specific whole site modernization projects could include significant quantities of excavation. Construction activities could result in significant impacts on paleontological resources should they require more than 1,000 cubic yards of excavation at any of the near-term, site-specific project schools listed in Table 4.11-3 (high sensitivity). Schools with high sensitivity include the following:

- Baker Elementary
- Boone Elementary
- Clairemont High
- Correia Middle
- Crown Point Junior Music Academy
- Fulton K-8
- Pacific View Leadership Academy
- Marshall Elementary
- Oak Park Elementary
- Pacific Beach Elementary
- Perkins K-8
- Perry Elementary
- Roosevelt Middle
- Rowan Elementary
- Valencia Park Elementary

Construction activities could also result in significant impacts on paleontological resources should they require or more than 2,000 cubic yards of excavation at any of the near-term, site-specific whole site modernization schools listed in Table 4.11-4 (moderate sensitivity). Schools with moderate sensitivity include the following:

- Euclid Elementary

- Madison High
- Paradise Hills Elementary
- Rowan Elementary

Near-term, site-specific whole site modernization projects that exceed the appropriate depth threshold (less than 10 feet for sites where previously undisturbed formation has been exposed by prior grading of the site, or more than 10 feet for sites containing artificial fill to depths of greater than 10 feet) could result in significant impacts on paleontological resources (**Impact-PAL-4**). Barnard Asian Pacific Language Academy is entirely underlain by geologic units with no or low paleontological sensitivity.

In addition, near-term, site-specific whole site modernization projects have the potential to result in significant impacts on paleontological resources if located on or within 100 feet of a documented fossil collection locality, as indicated in Tables 4.11-3 through 4.11-5, because any ground-disturbing activities in these areas could damage paleontological resources (**Impact-PAL-5**).

### Operation

Operational activities associated with the near-term, site-specific whole site modernization projects would not involve ground disturbance or other activities that could affect paleontological resources. In addition, existing schools would be located in already developed areas, and their operation would not encourage human encroachment into previously undeveloped areas. Therefore, operations associated with the near-term, site-specific whole site modernization projects would not directly or indirectly destroy unique paleontological resources or fossil collection localities. No impact would occur.

## Level of Significance Prior to Mitigation

### Construction

**Impact-PAL-4: Potential to Disturb Buried Paleontological Resources During Construction of Near-Term, Site-Specific Whole Site Modernization Projects.** Reasonably foreseeable construction activities associated with near-term, site-specific whole site modernization projects have the potential to significantly affect paleontological resources as a result of any ground-disturbing activities exceeding the appropriate depth threshold (less than 10 feet for sites where previously undisturbed strata have been exposed by prior grading of the site, more than 10 feet for sites containing artificial fill to depths of greater than 10 feet, or when project-specific documentation/evidence [i.e., geotechnical reports, etc.] indicate a different depth threshold should be applied such as when surficial resources may exist) requiring more than 1,000 cubic yards of excavation within a high sensitivity formation and/or more than 2,000 cubic yards of excavation within a moderate sensitivity formation. This is a potentially significant impact.

**Impact-PAL-5: Potential to Disturb Fossil Collection Localities During Construction of Near-Term, Site-Specific Whole Site Modernization Projects.** Reasonably foreseeable ground-disturbing construction activities associated with near-term, site-specific whole site modernization projects have the potential to significantly affect paleontological resources when the project is located on or within 100 feet of a documented fossil collection locality. This is a potentially significant impact.

### Operation

Operation of near-term, site-specific whole site modernization projects would not directly or indirectly destroy a unique paleontological resource or site. There would be no impacts.

## Mitigation Measures

For **Impact-PAL-4** and **Impact-PAL-5**:

Implement **MM-PAL-1** and **MM-PAL-2**, as described above.

## Level of Significance After Mitigation

### Construction

With implementation of **MM-PAL-1** and **MM-PAL-2**, **Impact-PAL-4** would be reduced to a less-than-significant level because future near-term, site-specific whole site modernization projects would be required to screen for grading quantities and paleontological sensitivity, and the recommended monitoring of any ground-disturbing activities that extend 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site. Similarly, **Impact-PAL-5** would be reduced to a less-than-significant level with the implementation of **MM-PAL-2**. Therefore, impacts would be less than significant with mitigation incorporated.

### Operation

Operation of the near-term, site-specific whole site modernization projects would not directly or indirectly destroy a unique paleontological resource or site. There would be no impacts.

# Section 4.12
# Recreation

## 4.12.1 Overview

This section describes the existing conditions and applicable laws and regulations for recreation, followed by an analysis of the Proposed Program's potential to include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

Table 4.12-1 summarizes the significant impacts and mitigation measures (MMs) discussed in Section 4.12.4.3, *Impacts and Mitigation Measures*.

**Table 4.12-1. Summary of Significant Recreation Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities; Whole Site Modernization; Upgrades of Existing School and Administrative Sites; Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| No significant impacts were identified. | None required | Less than Significant | N/A |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| No significant impacts were identified. | None required | Less than Significant or Beneficial | N/A |

## 4.12.2 Existing Conditions

The District is primarily within the boundaries of the City of San Diego, but also includes a small portion of the City of La Mesa, the City of Lemon Grove, and unincorporated San Diego County. However, all existing District facilities are within the boundaries of the City of San Diego. As such, the discussion of existing conditions focuses on the recreational facilities within the City of San Diego. The City has approximately 42,263 acres of park land, joint use, and open space lands that offer a diverse range of recreational opportunities (City of San Diego 2019a). These park and open space lands are overseen by the City of San Diego Parks and Recreation Department and include more than 400 parks and 26 miles of shoreline from Sunset Cliffs to La Jolla (City of San Diego 2019b). Per the Recreation Element of the City's General Plan (City of San Diego 2015), the City provides three use categories of parks and recreation for residents and visitors: population-based, resource-based, and open space. These three categories, including land, facilities, and programming, constitute the City's municipal park and recreation system.

- Population-based parks (commonly known as Neighborhood and Community parks), facilities, and services are located close to residential development and are intended to serve the daily needs of the neighborhood and community. When possible, they adjoin schools in order to share

facilities, and ideally are within walking distance of the residences within their service area. The minimum standard parks-to-population ratio established in the City's General Plan is 2.8 acres per 1,000 people. Neighborhood parks serve a population of 5,000 within an approximately 1-mile radius and range from 3 to 13 acres in size. Neighborhood parks may include picnic areas, children's play areas, multi-purpose courts, multi-purpose turf areas, comfort stations, walkways, and landscaping, and are accessible by bicycling or walking. Community parks serve a population of 25,000 and are a minimum 13 acres in size. Community parks may include passive and active recreation facilities such as those found in neighborhood parks, recreation centers, aquatic complexes, and multi-purpose fields (see descriptions below).

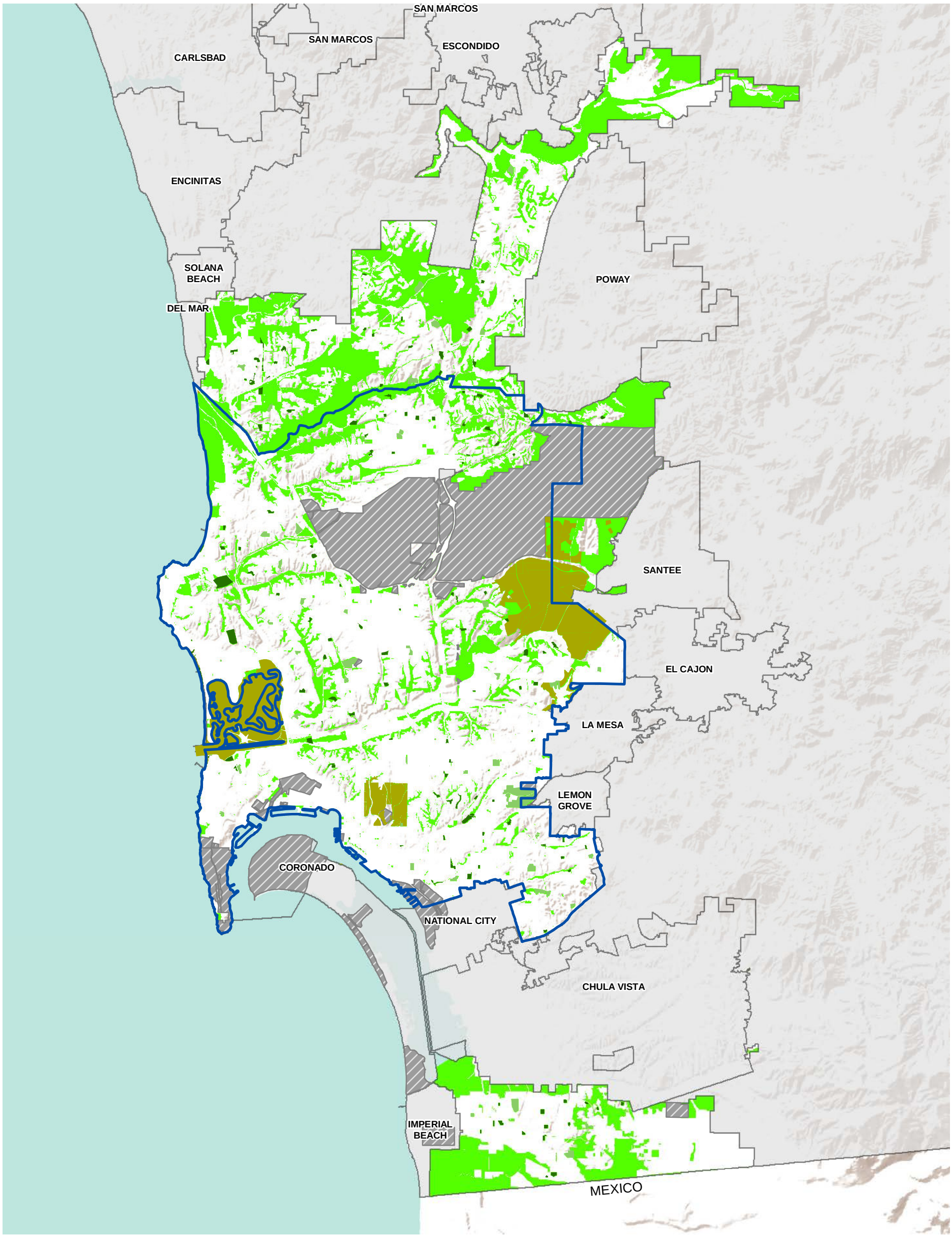
- Resource-based parks are located at, or centered on, notable natural or human-made features (beaches, canyons, habitat systems, lakes, historic sites, and cultural facilities) and are intended to serve the citywide population, as well as visitors.
- Open space lands are City-owned lands located throughout the City, consisting of canyons, mesas, and other natural landforms. This open space is intended to preserve and protect native plants and animals, while providing public access and enjoyment by the use of hiking, biking, and equestrian trails.

In addition to population-based parks, resource-based parks, and open space, the City maintains the following developed regional parks:

- Balboa Park
- Mission Bay Park
- Mission Trails Regional Park

Furthermore, the City has 58 recreation centers, 13 pools, 7 skate parks, and many other recreational facilities available to residents and visitors. Recreation centers generally serve a population of 25,000 within an approximately 3–mile area. These facilities may include a gymnasium, indoor courts, multi-purpose rooms, kitchen, and other community-serving facilities. Aquatic complexes serve a population of 50,000 with Olympic-sized swimming pools and occasionally a children's or therapeutic pool, with support facilities such as locker rooms and showers.

Figure 4.12-1 shows the location of various parks and recreational facilities within the City.




**Legend**

- SDUSD Boundary
- Military Use
- Neighborhood Park
- Community Park
- Resource Based Park
- Open Space (Public & Private)

Source:SanGIS (2019); ESRI

ICF

N

0 2.5 5 Miles

**Figure 4.12-1**
**Existing Open Space and Parks Map**

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To assist the City of San Diego in meeting community park needs, the District and City enter into joint-use agreements for community use of District recreational facilities. Joint-use between the City and the District currently occurs under the Recreation Agreement of September 1948, and the Memorandum of Understanding Between the City and District for the Development and Maintenance of Joint Use Facilities adopted by the San Diego City Council on October 7, 2002 (Resolution No. 297149) and by the District's Board of Education on October 8, 2002. The City, has to date, entered into approximately 90 agreements with the District to access over 300 acres of playgrounds and fields on District property during off-school hours (City of San Diego 2019a). The Play All Day Program is a collaboration between the District and City to expand recreational opportunities throughout San Diego and help the City address park space deficiencies in each of its communities. Joint-use partnerships with schools fill an essential gap in addressing the City's need for more park land and additional recreational opportunities.

Joint-use facilities can include any land area or physical structure shared by one or more public or not-for-profit entities. An example of a joint-use facility is a multi-purpose sports field at a secondary or middle school that is exclusively used for school purposes during school hours but is available for public use when school is not in session. Joint-use serves an increasingly important role in providing recreation space and facilities in the older, more densely populated urban communities of the City.

# 4.12.3 Applicable Laws and Regulations

## 4.12.3.1 Federal

### Title IX of the Education Amendments of 1972

Title IX of the Education Amendments of 1972 (Title IX) was established to protect people from discrimination based on sex in education programs or activities. Title IX applies to institutions that receive federal financial assistance, including state and local education agencies. Title IX covers several educational programs and activities, including athletics. Under Title IX, institutions that operate or sponsor athletic programs must provide equal athletic opportunities for members of both sexes. These requirements extend to athletic facilities such as locker rooms, practice and competitive facilities, and training facilities.

## 4.12.3.2 State

### California Building Code

The California Building Code (CBC) consists of 11 parts that contain administrative regulations of the California Building Standards Commission and regulations of all State agencies that implement or enforce building standards. Local agencies must ensure that development in their jurisdictions complies with guidelines contained in the CBC. Cities and counties can, however, adopt building standards beyond those provided in the CBC.

Although geologic resources and geotechnical hazards are governed primarily by local jurisdictions, most local jurisdictions rely on the CBC as the basis for seismic design. All local jurisdictions must comply with regulations of the Alquist-Priolo Act and Earthquake Fault Zone requirements of the State

of California Department of Conservation. These regulations and requirements are described in detail in Section 4.6, *Geology and Soils*, of this PEIR.

### Division of the State Architect

The Division of the State Architect (part of the California Department of General Services) provides design and construction oversight for K–12 schools, community colleges, and various other State-owned and State-leased facilities to ensure that they comply with all structural, accessibility, and fire and life safety codes. The Division also develops accessibility, structural safety, and historical building codes and standards utilized in various public and private buildings throughout the state of California.

### Education Code Section 17251/California Code of Regulations, Title 5

Education Code Section 17251 and the California Code of Regulations (CCR), Title 5, Sections 14001 through 14012, outline the powers and duties of the Department of Education regarding school sites and the construction of school buildings. Districts seeking state funding must comply with the Education Code and CCR Title 5. Site approval from the Department of Education must be granted before the State Allocation Board will apportion funds. Districts using local funds are encouraged to seek the Department's approval. The California Department of Education issues and maintains a School Site Selection and Approval Guide to assist school districts in selecting sites that provide a safe and supportive environment for the instructional program and the learning process. The guide outlines the selection criteria for gaining California Department of Education approval, a condition for receiving state funds.

### Senate Bill 1404 (Education Code Section 38130 – K-12)

Senate Bill 1404 (The Civic Center Act), codified as Education Code Sections 38130 et seq., provides that "[e]very public school facility is considered a civic center where citizens, school-community councils, and clubs as well as senior, recreation, education, political, artistic, and other organizations may meet. The school district may grant the use of school facilities and grounds upon certain terms and conditions deemed proper by the governing board and subject to specified limitations, requirements, and restrictions set forth within the law." The goal of these guidelines is to balance the mandate for the use of school facilities as a civic center with the need to manage appropriate and safe use of school facilities while maintaining minimal liability impact on the District.

## 4.12.3.3 Local

California Government Code Section 53094 includes provisions for school districts to exempt specific school facilities from local zoning regulations. However, the following City plans and policies are relevant to the Proposed Program as they relate to joint-use facilities and are provided for informational purposes.

### City of San Diego General Plan

The City of San Diego General Plan Recreation Element includes Table RE-2, *Parks Guidelines*, and Table RE-3, *Recreation Facilities Guidelines*, which provide the minimum standards and strategies for development of population-based park and recreation facilities. The following policies in the Recreation Element are relevant to the Proposed Program.

RE-A.4. Consider existing, long-term recreation facilities provided by not-for-profit organizations when establishing priorities for new facilities.

RE-A.9. Where development of population-based park acreage for recreational purposes is infeasible due to land constraints, consider the use of park and recreation "equivalencies" that have been identified through a Parks Master Plan, or community plan update/amendment process.

a. Use the proposed Parks Master Plan to develop the criteria and details of how the credits/calculations for "equivalencies" would be implemented and tracked on a project and community basis (see also RE-A.1).

    i. Continue the ongoing practice of developing joint-use facilities utilizing a public input process; joint use facilities may be developed prior to the adoption of the Parks Master Plan. b. Clearly demonstrate and document the acceptability of any proposed "equivalencies" through findings made and approved by the City, which state how required park acreage, recreation facilities and/or infrastructure standards are being met; and that the equivalency is consistent with the applicable community plan and park master plans.

RE-A.18. Pursue joint-use agreements for recreational facilities on other public agency-owned land to help implement the population-based park acreage requirements if they meet the criteria for equivalencies (see also Table RE-4, Eligible Population-Based Park Equivalencies).

RE-E.1. Engage in multi-purpose planning and inter-agency coordination to provide a variety of compatible recreational activities within a given location, especially where they cross jurisdictional boundaries.

RE-E.2. Work with local school districts, colleges, and universities to expand development of on-campus joint-use recreation facilities including multi-purpose courts, parking lots, and multi-purpose athletic fields.

RE-E.3. Support local school districts' efforts to expand elementary and secondary school sites that result in additional joint use opportunities while balancing the competing needs of recreation and housing.

RE-E.5. Pursue acquisition or lease of surplus school property for park development.

RE-E.8. Pursue partnerships and agreements with public agencies and not-for-profit entities to provide additional recreational space within the City such as parks, greenbelts, trail connections, parkways, bike paths, community gardens, and other recreation facilities. Potential partners for recreation land and facilities may include, but are not limited to:

- Metropolitan Transit System
- San Diego Unified Port District
- California Department of Transportation
- U. S. Department of Defense
- Other governmental agencies and jurisdictions
- Utility and railroad companies

- Redevelopment agencies
- Not-for-profit youth and recreation entities
- School districts.

RE-E.10. Secure land for joint use recreational facilities to ensure its public use in perpetuity.

a. Acquire land identified for school athletic program use, where the cost is beneficial and suitable for joint use.

b. Develop financing strategies for City acquisition of land for joint use facilities, where feasible.

c. Where acquisition of the joint use land is not feasible, provide other assurances (such as memoranda of understanding or park easements) that joint use materializes.

d. Negotiate and enter into joint use agreements with school districts to help implement population-based park recommendations.

# 4.12.4 Impact Analysis

## 4.12.4.1 Methodology

This analysis qualitatively evaluates the Proposed Program's effects related to recreation, and includes a program-level analysis of the Proposed Program as well as site-specific analysis of near-term, whole site modernization projects that have been identified by the District. Recreational impacts could occur if the Proposed Program would include the construction of new or expanded recreational facilities that would directly result in a physical impact on the environment during construction and/or operation. As discussed in Chapter 3, *Project Description*, project categories that could involve the construction or expansion of recreational facilities include New Acquisition and New School or Administrative Facilities; Whole Site Modernization; and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program. Therefore, the analysis focuses on the potential physical impacts of constructing and operating new or expanded recreational facilities under these project categories, which could include upgrades to existing school play areas and fields, construction and operation of new play areas and fields at existing schools, or construction and operation of new schools that include fields and other recreational facilities.

## 4.12.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining the significance of impacts associated with recreation resulting from the Proposed Program. The determination of whether a recreation impact would be significant is based on the thresholds described below and the professional judgment of the District as Lead Agency and the recommendations of qualified personnel at ICF, all of which is based on the evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following.

1. 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.

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

As discussed in Section XVI of the Initial Study/Environmental Checklist (Appendix B), Threshold 1 is not included in the analysis below, as it was determined that the Proposed Program would result in less-than-significant impacts related to the substantial deterioration of existing neighborhood and regional parks or other recreational facilities. Those conclusions and the rationale that supports them are summarized in Chapter 6, *Additional Consequences of Project Implementation*. Therefore, only Threshold 2 is discussed in the impact analysis that follows.

# 4.12.4.3 Impacts and Mitigation Measures

***Threshold 2: Would the Proposed Program include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

***Construction***

This project category includes the acquisition of new properties and the construction of new school or administrative facilities. Although the acquisition of a new site is an administrative procedure, subsequent development of newly acquired sites would result in physical changes to the environment. New administrative facilities would be intended for District staff and would function as offices, and therefore would not include new recreational facilities that could result in significant environmental effects resulting from their construction. As such, the analysis focuses on the potential significant recreation impacts from new school construction.

Construction of new schools (including charter schools) would include new recreational facilities to accommodate the student population. Recreational facilities could include new outdoor play areas, such as hard court areas, playfields, and other physical education facilities. Additionally, new high schools would potentially include new athletic stadiums to support school athletic programs such as football and soccer. As these components are considered part of the Proposed Program, the environmental effects related to construction of these facilities have been analyzed in the appropriate sections of this PEIR, including Sections 4.2, *Air Quality and Health Risk*, 4.3, *Biological Resources*, 4.4, *Cultural Resources*, 4.6, *Geology and Soil,* 4.8, *Hazards and Hazardous Materials*, and 4.10, *Noise and Vibration*. Because schools are considered growth-accommodating uses, not growth-generating uses, new school or administrative facilities would not generate demand for any additional recreational resources in the neighborhoods in which they would be located beyond those constructed as part of the new school to accommodate the school's physical education and athletic programs. As such, new school construction projects would not require new or expanded recreational facilities that could result in adverse physical effects on the environment. Impacts would be less than significant.

***Operation***

The Proposed Program involves the construction of new recreational facilities as part of new school projects. Once constructed, there is a potential that operation of recreational facilities at newly constructed schools would represent a new use, and operation of these new facilities could introduce new sources of noise to an area. Furthermore, these facilities would be available for third-party rentals and community use under the Civic Center Act, which permits organizations, clubs, and associations formed for recreational, educational, political, economic, artistic, and moral purposes to use school buildings and grounds. The proposed improvements would not preclude third-party or community use under the Civic Center Act.

The operation of new schools would potentially include new athletic stadiums and fields to support athletic programs such as soccer, football, and baseball. These new athletic facilities could potentially include nighttime stadium lighting and other sources of lighting, such as marquee signs, which could result in a substantial new source of nighttime lighting.

As these components are considered part of the New Acquisition and New School or Administrative Facilities project category, the environmental effects related to operation of these facilities have been analyzed in the appropriate sections of this PEIR, including Sections 4.2, *Air Quality and Health Risk*, and 4.10, *Noise and Vibration*. Because schools are considered growth-accommodating uses, not growth-generating uses, new school or administrative facilities would not generate demand for any additional recreational resources. As such, new school or administrative facilities projects would not require new or expanded recreational facilities that could result in adverse physical effects on the environment. Therefore, potential impacts associated with the operation of new or expanded recreational facilities under this project categories would be less than significant.

**Level of Significance Prior to Mitigation**

***Construction***

New school or administrative facilities projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

***Operation***

Operations associated with new school or administrative facilities would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

**Mitigation Measures**

No mitigation is required.

**Level of Significance After Mitigation**

***Construction***

New school or administrative facilities projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

#### *Operation*

Operations associated with new school or administrative facilities projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

Whole site modernization projects could involve substantial redevelopment of existing school properties, including charter schools, as well as existing District administrative facilities. Administrative facilities are intended for District staff and function as offices, and therefore do not contain recreational facilities. As such, the analysis focuses on the potential significant recreation impacts from whole site modernization of existing school sites.

Whole site modernization projects at existing schools could include improved athletic facilities, such as new/replacement athletic fields, stadiums, public address systems, gymnasiums, and other improvements such as installation of artificial or natural turf fields to replace existing athletic facilities or the reconfiguration of existing athletic facilities. These improvements could be constructed at any of the District's schools and could involve excavation and ground-disturbing activities for the installation of athletic fields, replacement field lighting, and other athletic facilities. The environmental effects related to construction of these improvements have been analyzed in the appropriate sections of this PEIR, such as Sections 4.2, *Air Quality and Health Risk*, 4.3, *Biological Resources,* 4.4, *Cultural Resources*, 4.8, *Hazards and Hazardous materials*, and 4.10, *Noise and Vibration*. For example, construction activities for new or expanded recreational facilities could encounter contaminated soil and/or groundwater or generate noise that could affect biological resources potentially present adjacent to the site. However, because schools are considered growth-accommodating uses, not growth-generating uses, whole site modernization projects would not generate demand for any additional recreational resources. As such, this project category would not require new or expanded recreational facilities that could result in adverse physical effects on the environment. Impacts would be less than significant.

#### *Operation*

The Proposed Program involves various upgrades to recreational facilities at existing school sites as part of whole site modernization projects. Once constructed, operation of new or expanded recreational facilities at existing school sites would be similar to existing conditions. However, there is a potential that these recreational facilities could be relocated to a different part of the campus that might be closer to residences, which could be exposed to new sources of noise from activities such as recess and physical education. Furthermore, these facilities would be available for third-party rentals and community use under the Civic Center Act, which permits organizations, clubs, and associations formed for recreational, educational, political, economic, artistic, and moral purposes to use school buildings and grounds. The proposed improvements would not preclude third-party or community use under the Civic Center Act.

It should be noted that new or upgraded athletic facilities associated with whole site modernization projects would not include new stadium lighting, but rather would potentially include replacement

of existing stadium lighting with new LED lighting. These upgrades would often improve light spillover conditions due to replacement of old metal-halide lighting standards, which produce more light spillover and are not typically downward facing or shielded, with new LED lighting standards.

Because these are components of whole site modernization projects, the environmental effects related to operation of these facilities have been analyzed in the appropriate sections of this PEIR, including Sections 4.1, *Aesthetics*, 4.2, and 4.10, *Noise and Vibration*. In addition, because schools are considered growth-accommodating uses, not growth-generating uses, whole site modernization projects would not generate demand for any additional recreational resources. As such, this project category would not require new or expanded recreational facilities that could result in adverse physical effects on the environment. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with whole site modernization projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

#### *Operation*

Operations associated with whole site modernization projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with whole site modernization projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

#### *Operation*

Operations associated with whole site modernization projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

None of the potential improvements that could occur with upgrades of existing school and administrative sites include recreational facilities that could result in adverse physical effects on the environment during construction. Therefore, no impacts would occur.

***Operation***

None of the potential improvements that could occur with upgrades of existing school and administrative sites include recreational facilities that could result in adverse physical effects on the environment during operations. Therefore, no impacts would occur.

### Level of Significance Prior to Mitigation

***Construction***

None of the potential improvements that could occur with upgrades of existing school and administrative sites include recreational facilities that could result in adverse physical effects on the environment during construction. Therefore, no impacts would occur.

***Operation***

None of the potential improvements that could occur with upgrades of existing school and administrative sites include recreational facilities that could result in adverse physical effects on the environment during operation. Therefore, no impacts would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

***Construction***

None of the potential improvements that could occur with upgrades of existing school and administrative sites include recreational facilities that could result in adverse physical effects on the environment during construction. No impacts would occur.

***Operation***

None of the potential improvements that could occur with upgrades of existing school and administrative sites include recreational facilities that could result in adverse physical effects on the environment during operation. No impacts would occur.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

***Construction***

Under the Proposed Program, the District plans to improve and install student and neighborhood joint-use play fields at, or immediately adjacent to, existing school sites throughout the District. Joint-use facility projects involve construction and operation of new recreational facilities intended for future joint use between the District and City of San Diego as part of the Play All Day Program. Work may include both upgrades to existing playgrounds, fields, and physical education facilities or construction of new facilities intended for future joint use. Under the Play All Day Program, new joint-use parks and recreational facilities would be constructed by the District on existing school sites using bond funds, while the City's Parks and Recreation Department would be responsible for

operation and maintenance of the new facilities. Potential operation-related impacts of new or expanded joint-use facilities are discussed under *Operations* below.

These projects can typically include the following components.

- Removal of existing decomposed granite fields.
- Installation of a new natural or artificial turf field.
- Installation of a new stabilized walking track (decomposed granite or asphalt).
- Construction of pools and associated facilities such as equipment buildings, bleachers, restrooms/changing facilities, and concessions facilities.
- Construction of additional parking to accommodate joint-use facility users in accordance with the parking requirements in the City's Municipal Code (Section 142.050 et seq.).
- Other minor amenities that would provide a new recreational space for students and nearby residents in the community, including comfort stations, benches, hard court areas, shade trees, drinking fountains, trash cans, and dog waste stations.
- Utilities for electrical power, water conveyance, sewage, and drainage.

Construction activities associated with installation of fields, walking tracks, parking, or other recreational facilities would generally involve minimal ground disturbance with shallow excavation and light equipment. These improvements could be constructed at any of the District's school sites. Depending on the location, construction of these facilities could result in impacts on biological resources, cultural resources, hazards and hazardous materials, and noise. For example, a joint-use field could be constructed adjacent to sensitive habitat or City of San Diego designated Multi Habitat Planning Area, or contaminated soil and/or groundwater could be encountered during ground-disturbing activities.

Additionally, this project category includes the construction of new pools that would also be intended for joint use by the community. Any new pools constructed under this category would typically measure up to 55 by 25 yards, but may be larger or smaller depending on the need. Construction of pools would require deep excavation as well as ground disturbance for associated facilities (e.g., locker rooms), likely requiring the use of heavy equipment. Similar to joint-use fields, new pools could be constructed at or adjacent to any of the District's school sites. Due to the depth of excavation and substantial earthwork required for the construction of new pools, there is a potential that these activities could impact cultural and paleontological resources.

Because joint-use facilities are project components of the Proposed Program, the impacts associated with their construction have been analyzed in the appropriate sections of this PEIR. Joint-use facilities would not generate demand for any additional recreational resources and would not require new or expanded recreational facilities that could result in adverse physical effects on the environment. Impacts would be less than significant.

***Operation***

This project category includes future joint-use agreements administered at existing recreational facilities, operation of existing joint-use agreements at existing recreational facilities, and extensions of existing joint-use agreements. For each newly constructed field, pool, or Play All Day Program facility associated with this project category, a joint-use agreement would be executed between the District and the City that specifies details of use, such as the hours of operation, types of

activities/sports allowed at each site, how gates would be locked if a custodian were not available, and how maintenance would be performed. Each joint-use field may be used for organized sports activities. The joint-use agreement for each site would address the possible use of the field by organized sports leagues, including, for example, specifications for hours of use and number of participants. The size of each joint-use field would dictate what type of organized sports activity could occur. The operation of new joint-use facilities could introduce new sources of noise to an area, which could affect both nearby residents and biological resources potentially present adjacent to the site. Where existing recreational facilities would be replaced with new joint-use facilities, the hours of facility use could be extended beyond typical school hours, which would represent a change from existing conditions.

It should be noted that this project category does not include the installation of nighttime field lighting. As such, any new joint-use facilities would only be available for use during daylight hours (i.e., closed at dusk and not opened until dawn). Any lighting installed at a joint-use facility would include minimal lighting for safety and security, including lighting on new buildings and in parking lots. These lighting fixtures would include downward-focused, shielded lights, which would not represent a substantial source of new nighttime lighting.

Because joint-use facilities are project components of the Proposed Program, the impacts associated with operation of these facilities have been analyzed in the appropriate sections of this PEIR. Joint-use facilities would not generate demand for any additional recreational resources and would not require new or expanded recreational facilities that could result in adverse physical effects on the environment. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with joint-use facilities would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

#### *Operation*

Operations associated with joint-use facilities would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with joint-use facilities would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

***Operation***

Operations associated with joint-use facilities would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

# Site-Specific Analysis

## Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.12-2. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the whole site modernization project category, as described further in Chapter 3, *Project Description*.

**Table 4.12-2. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019.

### Construction

As described further in Chapter 3, whole site modernization projects could include improved athletic facilities, such as new/replacement athletic fields; stadiums; public address systems; or field

lighting, gymnasiums, and other improvements such as installation of artificial or natural turf fields to replace existing athletic facilities or the reconfiguration of existing athletic facilities. These improvements could be constructed at any of the 21 schools identified in Table 4.12-2, and could involve excavation and ground-disturbing activities for the installation of athletic fields, replacement field lighting, and other athletic facilities. Because these are components of the near-term, site-specific whole site modernization projects, the environmental effects related to construction of these facilities have been analyzed in the appropriate sections of this PEIR, including Sections 4.2, *Air Quality and Health Risk*, 4.3, *Biological Resources*, 4.4, *Cultural Resources*, 4.6, *Geology and Soil,* 4.8, *Hazards and Hazardous materials*, 4.9, *Hydrology and Water Quality,* and 4.10, *Noise and Vibration*. In addition, because schools are considered growth-accommodating uses, not growth-generating uses, near-term, site-specific whole site modernization projects would not generate demand for any additional recreational resources. As such, this project category would not require new or expanded recreational facilities that could result in adverse physical effects on the environment. Impacts would be less than significant.

### Operation

Once construction of each near-term, site-specific whole site modernization project is completed, it is anticipated that operation of new or expanded recreational facilities would be similar to existing conditions. However, because the details of these 21 near-term whole site modernization projects is currently unknown, there is a potential that existing recreational facilities could be relocated to a different part of the campus that might be closer to residences, which could be exposed to new sources of noise from activities such as recess and physical education. Additionally, these facilities, whether new or redeveloped, would be available for third-party rentals and community use under the Civic Center Act. The environmental effects related to operation of these facilities have been analyzed in the appropriate sections of this PEIR, including Sections 4.2, *Air Quality and Health Risk*, and 4.10, *Noise and Vibration*. In addition, because schools are considered growth-accommodating uses, not growth-generating uses, near-term, site-specific whole site modernization projects would not generate demand for any additional recreational resources. As such, this project category would not require new or expanded recreational facilities that could result in adverse physical effects on the environment. Impacts would be less than significant.

## Level of Significance Prior to Mitigation

### Construction

Construction activities associated with the near-term, site-specific whole site modernization projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

### Operation

Operations associated with the near-term, site-specific whole site modernization projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

### Construction

Construction activities associated with the near-term, site-specific whole site modernization projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

### Operation

Operations associated with the near-term, site-specific whole site modernization projects would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Impacts would be less than significant.

# 4.13.1 Overview

This section describes the existing transportation conditions, applicable policies and regulations related to transportation, and an analysis of transportation impacts resulting from construction and operation of the Proposed Program. The information in this section is based on the Transportation Impact Analysis (TIA) prepared by Chen Ryan Associates, Inc. in December 2019, which is included as Appendix J.

Impacts related to transportation and circulation were considered significant if the proposed project would (1) conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; (2) conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b); (3) substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or (4) result in inadequate emergency access.

Table 4.13-1 summarizes the significant impacts and mitigation measures (MMs) discussed in Section 4.13.4.3, *Project Impacts and Mitigation*.

**Table 4.13-1. Summary of Significant Transportation Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact-TRA-1:** Conflict with Policies Related to Safe and Effective Pedestrian and Bicycle Routes to School and Result in Potential Safety Hazards During Operation of a New School. | **MM-TRA-1:** Develop a Safe Routes to School Plan; **MM-TRA-2:** Develop a Pick-up/Drop-off Plan. | Less than Significant | Preparation of a Safe Routes to School Plan and a Pick-up/Drop-off Plan to reduce safety hazards associated with vehicular congestion on area roadways and identify safe routes for pedestrians, bicyclists, and transit facilities would ensure that the project is consistent with the City's policies related to safe and effective performance of pedestrian, bicycle, and transit facilities |
| **Impact-TRA-3:** Potential to Generate Increased Vehicle Miles Traveled Within the Program Area Due to Increased Student Capacity or New Staff. | **MM-TRA-3:** Prepare a Project-Specific Vehicle Miles Traveled Analysis; **MM-TRA-4:** Prepare a Transportation | Significant and Unavoidable | Because the actual vehicle miles traveled (VMT) reductions that would be achieved with implementation of **MM-TRA-3** and **MM-TRA-4** cannot be quantified at this programmatic level, it cannot be definitively concluded that these measures would reduce new |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | Demand Management Plan | | VMT generation to less-than-significant levels. |
| **Whole Site Modernization** | | | |
| **Impact-TRA-2:** Conflict with Policies Related to Safe and Effective Pedestrian and Bicycle Routes to School and Result in Potential Safety Hazards During Operation of a Whole Site Modernization Project. | **MM-TRA-1:** Develop a Safe Routes to School Plan; **MM-TRA-2:** Develop a Pick-up/Drop-off Plan. | Less than Significant | Preparation of a Safe Routes to School Plan and a Pick-up/Drop-off Plan to reduce safety hazards associated with vehicular congestion on area roadways and identify safe routes for pedestrians, bicyclists, and transit facilities would ensure that the project is consistent with the City's policies related to safe and effective performance of pedestrian, bicycle, and transit facilities |
| **Upgrades of Existing School and Administrative Sites** | | | |
| All impacts identified for Upgrades of Existing School and Administrative Sites were less than significant. | No mitigation is required. | Less than Significant | N/A |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| All impacts identified for Joint-Use Facilities Including Fields, Pools, and Play All Day Program were less than significant. | No mitigation is required. | Less than Significant | N/A |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| **Impact-TRA-2:** Conflict with Policies Related to Safe and Effective Pedestrian and Bicycle Routes to School and Result in Potential Safety Hazards During Operation of a Whole Site Modernization Project. | **MM-TRA-1:** Develop a Safe Routes to School Plan; **MM-TRA-2:** Develop a Pick-up/Drop-off Plan. | Less than Significant | Preparation of a Safe Routes to School Plan and a Pick-up/Drop-off Plan to reduce safety hazards associated with vehicular congestion on area roadways and identify safe routes for pedestrians, bicyclists, and transit facilities would ensure that the project is consistent with the City's policies related to safe and effective performance of pedestrian, bicycle, and transit facilities |

# 4.13.2 Existing Conditions

The existing vehicle miles traveled (VMT) for each of the 16 District clusters in the Program area serves as the basis for comparison to the VMT resulting from implementation of the Proposed Program. Variables necessary to calculate the VMT for each cluster include the average student enrollment and staff and average trip length, as discussed in detail in Section 4.13.4.1, *Methodology*.

## 4.13.2.1 Average Enrollment by Cluster

To account for the year-to-year fluctuations in student enrollment, average cluster enrollment was estimated using enrollment data for each of the District's traditional public and charter schools on District-owned property over a 10-year period (2009–2018). Table 4.13-2 displays the overall average enrollment for all schools combined within each cluster. As shown, average cluster enrollment ranges from a low of 3,100 students (Mission Bay cluster) to a high of 15,878 students (San Diego cluster). Total 10-year enrollment data is provided in Appendix J.

**Table 4.13-2. 10-Year Average Student Enrollment by Cluster**

| Cluster | Average Enrollment |
|---|---|
| Clairemont | 3,760 |
| Crawford | 7,211 |
| Henry | 8,418 |
| Hoover | 9,931 |
| Kearny | 7,311 |
| La Jolla | 4,170 |
| Lincoln | 11,861 |
| Madison | 3,481 |
| Mira Mesa | 9,056 |
| Mission Bay | 3,100 |
| Morse | 8,555 |
| Point Loma | 8,761 |
| San Diego | 15,878 |
| Scripps Ranch | 7,057 |
| Serra | 6,144 |
| University City | 5,801 |
| **Total** | **120,495** |

Source: Appendix J.

## 4.13.2.2 Average Student Trip Length by Cluster

The average student trip length for each cluster differs due to a combination of several variables: the location of each school and roadway network configuration within the cluster, the attendance boundary size, and the distribution and density of residential land uses within each school's

attendance boundary.[1] Examples of each variable's influence on the average trip length are included below. High schools are referenced in the examples, considering they generally have the highest enrollment of any school within each cluster and the greatest attendance boundary size. These factors result in high schools having the greatest potential for influence on each cluster's average trip length, when compared to elementary and middle schools.

- **School Location and Roadway Network.** University City High School (University City cluster) is located in the southern third of the school's attendance boundary and just south of a rail corridor and canyon. Topography varies, with additional canyons throughout the enrollment boundary, resulting in a very circuitous roadway network with limited alternative routes. These factors greatly limit access to the school, forcing community members to use Genesee Avenue as the sole option for vehicular access, resulting in indirect routes to the school and longer trip lengths. Conversely, Crawford High School (Crawford cluster) is centrally located within the school's attendance boundary, and is supported by a strong street grid, which maximizes potential connections for students coming from all directions, resulting in relatively direct routes to school.
- **Attendance Boundary Size.** Hoover High School (Hoover cluster) draws from an attendance boundary that covers 3,025 acres, while Point Loma High School (Point Loma cluster) draws from an attendance boundary that covers 8,256 acres. The larger Point Loma High School attendance boundary results in students potentially travelling much greater distances to reach their assigned school.
- **Residential Land Uses**: Serra High School (Serra cluster) is located in proximity to some of the densest residential land uses within the school's attendance boundary, resulting in shorter trip distances for a large share of students. This concentration of residential density—combined with a relatively small enrollment boundary size—helps to offset the influence of the circuitous road network prevalent throughout the Serra High School attendance boundary. Conversely, many of the multi-family residential developments serving La Jolla High School (La Jolla cluster) are located on the periphery of the school's attendance boundary, far from the school. This results in a large share of students within the boundary travelling farther distances to the school and increasing the average student trip length.

Table 4.13-3 summarizes the average student trip length for each District cluster. As shown, average trip lengths range from a low of 0.92 mile (Hoover cluster) to a high of 3.35 miles (Point Loma cluster).

[1] Attendance boundaries are smaller areas within a cluster that identify which elementary, K-8, or middle school children within a cluster will attend. Whereas clusters identify a larger area and are organized geographically around a high school and consist of all the elementary, K–8, and middle schools that feed into it.

**Table 4.13-3. Average Student Trip Length by Cluster**

| Cluster | Average Student Trip Length (miles) |
|---|---|
| Clairemont | 1.33 |
| Crawford | 1.02 |
| Henry | 1.94 |
| Hoover | 0.92 |
| Kearny | 2.14 |
| La Jolla | 2.06 |
| Lincoln | 1.16 |
| Madison | 1.00 |
| Mira Mesa | 1.14 |
| Mission Bay | 1.20 |
| Morse | 1.20 |
| Point Loma | 3.35 |
| San Diego | 1.72 |
| Scripps Ranch | 2.27 |
| Serra | 1.08 |
| University City | 3.05 |

Source: Appendix J.

In addition to the variables described above, the presence of charter schools on District-owned properties within a cluster and the trip origins of charter school students also factor in the calculation of each cluster's average student trip length. As shown in Table 4.13-4, in each of the 10 clusters where a charter school is operated on District-owned property, the average student trip length for the traditional public schools within the cluster was found to be shorter than the average student trip length for the charter schools.

**Table 4.13-4. Average Student Trip Length Comparison**

| | Average Student Trip Length (miles) | |
|---|---|---|
| Cluster | Traditional Public School | Charter School |
| Clairemont | 1.33 | -- |
| Crawford | 0.79 | 1.85 |
| Henry | 1.82 | 4.49 |
| Hoover | 0.70 | 2.89 |
| Kearny | 1.47 | 5.46 |
| La Jolla | 2.06 | -- |
| Lincoln | 0.91 | 1.81 |
| Madison | 1.00 | -- |
| Mira Mesa | 1.14 | -- |
| Mission Bay | 1.20 | -- |
| Morse | 1.14 | 2.09 |
| Point Loma | 1.45 | 7.48 |
| San Diego | 1.14 | 3.05 |

| | Average Student Trip Length (miles) | |
|---|---|---|
| **Cluster** | **Traditional Public School** | **Charter School** |
| Scripps Ranch | 2.07 | 7.02 |
| Serra | 1.08 | -- |
| University City | 1.40 | 12.94 |
| **Overall Average** | **1.27** | **4.16** |

Source: Appendix J.

Districtwide, the charter schools on District-owned properties were found to have an average student trip length of 4.16 miles, whereas the districtwide average student trip length for traditional public schools was 1.27 miles. This finding demonstrates that charter schools increase the average student trip length for each cluster where they are present.

## 4.13.2.3 Staff by Cluster

Average staff by cluster was estimated by applying the staff-to-student ratio to the average enrollment of each school. Table 4.13-5 displays the estimated average staff for each cluster. Consistent with the enrollment by cluster presented in Table 4.13-2, staff levels range from a low of 110 (Mission Bay cluster) to a high of 574 (San Diego cluster).

**Table 4.13-5. Staff by Cluster**

| Cluster | Average Number of Staff |
|---|---|
| Clairemont | 134 |
| Crawford | 259 |
| Henry | 297 |
| Hoover | 352 |
| Kearny | 266 |
| La Jolla | 146 |
| Lincoln | 422 |
| Madison | 125 |
| Mira Mesa | 317 |
| Mission Bay | 110 |
| Morse | 305 |
| Point Loma | 308 |
| San Diego | 574 |
| Scripps Ranch | 248 |
| Serra | 216 |
| University City | 204 |
| **Total** | **4,283** |

Source: Appendix J.

## 4.13.2.4 Existing VMT by Cluster

Table 4.13-6 displays the total existing VMT for each cluster and VMT per student for each cluster using the methodology described in Section 4.13.4.1. It should be noted that the VMT per student

also accounts for the VMT that is generated by staff members of the cluster. When considering all clusters together, the existing average VMT per student is estimated to be 4.55 miles.

**Table 4.13-6. Existing VMT/Cluster and VMT/Student by Cluster**

| Cluster | VMT/Cluster | VMT/Student |
|---|---|---|
| Clairemont | 14,635.28 | 3.89 |
| Crawford | 24,832.59 | 3.44 |
| Henry | 40,711.39 | 4.84 |
| Hoover | 30,284.49 | 3.05 |
| Kearny | 44,419.24 | 6.08 |
| La Jolla | 21,724.24 | 5.21 |
| Lincoln | 42,174.34 | 3.56 |
| Madison | 11,243.11 | 3.23 |
| Mira Mesa | 31,909.26 | 3.52 |
| Mission Bay | 11,100.87 | 3.58 |
| Morse | 32,082.07 | 3.75 |
| Point Loma | 67,431.48 | 7.70 |
| San Diego | 76,902.00 | 4.84 |
| Scripps Ranch | 40,001.43 | 5.67 |
| Serra | 20,013.03 | 3.26 |
| University City | 38,431.08 | 6.62 |
| **Total** | **547,895.92** | **4.55[1]** |

Source: Appendix J.

[1] Overall average VMT/Student.

As shown, VMT ranges from a low of 3.05 VMT per student (Hoover cluster) to a high of 7.70 VMT per student (Point Loma cluster). The VMT per student is largely a byproduct of the average student trip length, which is dependent on the variables within the attendance boundary of each school, including school location and roadway network configuration, the attendance boundary size, and the location and density of residential land uses served by the school.

Additionally, the enrollment size of each school has an influence on the VMT/student determination. For example, Clairemont High School (Clairemont cluster) was estimated to have an average student trip length of 1.81 miles (longest trip length in the cluster; non-weighted average trip length in Clairemont cluster = 1.13 miles) and an average enrollment of 1,130 students (greatest enrollment in the cluster). Whereas Alcott Elementary School (Clairemont cluster) was estimated to have an average student trip length of 0.46 mile (shortest trip length in the cluster) and an average enrollment of 423 students (Clairemont cluster average enrollment = 537 students). Therefore, Clairemont High School has a stronger influence on the Clairemont cluster VMT/student than Alcott Elementary School.

# 4.13.3 Applicable Laws and Regulations

## 4.13.3.1 State

### Senate Bill 743

Governor Jerry Brown signed Senate Bill (SB) 743 on September 27, 2013, which mandated a change in the way that public agencies evaluate transportation impacts of projects under CEQA, focusing on VMT rather than level of service (LOS) and other delay-based metrics. SB 743 states that new methodologies under CEQA are needed for evaluating transportation impacts that are better able to promote the State's goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations. SB 743 indicates that measurements of transportation impacts may include VMT, VMT per capita, automobile trip generation rates, or automobile trips generated. Accordingly, SB 743 required the Governor's Office of Planning and Research to amend the State CEQA Guidelines to reflect these changes.

### State CEQA Guidelines Section 15064.3

Section 15064.3 of the State CEQA Guidelines was added as part of a comprehensive update to the guidelines that was adopted by the California Resources Agency in December 2018. Section 15064.3 describes specific considerations for evaluating a project's transportation impacts and identifies VMT as the most appropriate metric for determining transportation impacts. Except for roadway capacity projects, Section 15064.3 stipulates that a project's effect on automobile delay does not constitute a significant environmental impact under CEQA. The specific criteria for analyzing transportation impacts are provided in Section 15064.3, subdivision (b) of the State CEQA Guidelines.

### Technical Advisory on Evaluating Transportation Impacts in CEQA

In response to SB 743 and the addition of Section 15064.3 to the State CEQA Guidelines, the Governor's Office of Planning and Research (OPR) adopted the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR Technical Advisory) in December 2018 to provide technical recommendations on methods for assessing VMT, thresholds of significance, and mitigation measures (OPR 2018). The recommendations in the OPR Technical Advisory are intended to provide guidance to agencies and the public for assessing VMT-related transportation impacts under CEQA. Details of the recommended thresholds of significance from the OPR Technical Advisory are provided in Section 4.13.4.2, *Thresholds of Significance*.

## 4.13.3.2 Regional

### San Diego Association of Government's San Diego Forward: The Regional Plan

*San Diego Forward: The Regional Plan* (Regional Plan) was adopted by the San Diego Association of Governments (SANDAG) Board of Directors on October 9, 2015, to establish a long-range blueprint for the San Diego region's growth and development through the year 2050. The Regional Plan was developed in close partnership with the region's 18 cities and the County government, and aims to

provide innovative mobility choices and planning to support a sustainable and healthy region, a vibrant economy, and an outstanding quality of life for all. The Regional Plan integrates both the 2004 Regional Comprehensive Plan and the 2050 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) into one unified plan. By incorporating the SCS, the Regional Plan is in compliance with SB 375, which identifies how the region will address greenhouse gas emissions to meet State-mandated levels and focuses on land use planning and transportation issues in an attempt to develop sustainable growth patterns on a regional level.

California State Proposition 111, passed by voters in 1990, established a requirement that urbanized areas prepare and regularly update a Congestion Management Program (CMP). The requirements within the state CMP were developed to monitor the performance of the transportation system, develop programs to address near-term and long-term congestion, and better integrate transportation and land use planning. SANDAG provided regular updates for the state CMP from 1991 through 2008. In October 2009, the San Diego region elected to be exempt from the state CMP, and, since this decision, SANDAG has been abiding by 23 Code of Federal Regulations (CFR) 450.320 to ensure the region's continued compliance with the federal congestion management process. The Regional Plan is the region's long-range transportation plan and SCS, and meets the requirements of 23 CFR 450.320 by incorporating the following federal congestion management processes: performance monitoring and measurement of the regional transportation system, multimodal alternatives and non-single occupant vehicle analysis, land use impact analysis, the provision of congestion management tools, and integration with the regional transportation improvement program process.

### Riding to 2050, the San Diego Regional Bike Plan

The San Diego Regional Bike Plan (SANDAG 2010) was developed to support the 2004 Regional Comprehensive Plan and the 2050 RTP in implementing the regional strategy for utilizing bicycles as a valid form of everyday travel. The bike plan, as a part of the SCS mandated by SB 375, provides for a detailed Regional Bike Network, as well as the programs that are necessary to support it. Implementation of the Regional Bike Plan would help the region meet goals for reducing greenhouse gas emissions and improve mobility.

## 4.13.3.3 Local

The District's various educational facilities, administrative sites, and vacant parcels are within the land use jurisdiction and control of the District. However, because the streets and intersections serving these properties are within the City of San Diego's jurisdiction, the following local laws, regulations, and plans were considered in the analysis of the proposed project's impacts on transportation. Additionally, although the District's jurisdiction also includes small portions of the cities of La Mesa and Lemon Grove, as well as unincorporated San Diego County, all existing District facilities are within the boundaries of the City of San Diego. Therefore, in addition to the District's specifications, only City of San Diego regulations and standards are described below.

### San Diego Unified School District Traffic Control Specifications

Part 3 of Section 01 50 00, Temporary Facilities and Controls, of the District's construction specifications define procedures for temporary traffic controls during construction activities at District facilities. Specifically, the District requires contractors to comply with the requirements of

the authorities with jurisdiction over the roadways, protecting existing site improvements, including curbs, pavements, and utilities, and maintaining access for fire-fighting equipment and access to fire hydrants.

## City of San Diego General Plan Mobility Element

The Mobility Element of the City's General Plan, which was last updated in June 2015, establishes policies to accomplish the overarching goal to further the attainment of a balanced and efficient multi-modal transportation network that minimizes environmental and neighborhood impacts. The following policies from the Mobility Element pertain to the Proposed Program.

ME-A.2 Design and implement safe pedestrian routes.

a. Promote "Walking School Bus" efforts where parents and other responsible adults share the responsibility of escorting children to and from school by foot or bicycle.

b. When new schools are planned, work with school districts and affected communities to locate schools so that the number of students who can walk to school safely is maximized.

ME-A.9 Continue to collaborate with regional agencies, school districts, community planning groups, community activists, public health professionals, developers, law and code enforcement officials, and others, to better realize the mobility, environmental, social, and health benefits of walkable communities.

ME-C.2 Provide adequate capacity and reduce congestion for all modes of transportation on the street and freeway system.

ME-C.3 Design an interconnected street network within and between communities, which includes pedestrian and bicycle access, while minimizing landform and community character impacts.

b. Use local and collector streets to form a network of connections to disperse traffic and give people a choice of routes to neighborhood destinations such as schools, parks, and village centers. This network should also be designed to control traffic volumes and speeds through residential neighborhoods.

ME-C.8 Implement Traffic Impact Study Guidelines that address site and community specific issues.

a. Give consideration to the role of alternative modes of transportation and transportation demand management (TDM) plans in addressing development project traffic impacts.

b. Consider the results of site-specific studies or reports that justify vehicle trip reductions (see also ME-E.7).

c. Implement best practices for multi-modal quality/level of service analysis guidelines to evaluate potential transportation impacts and determine appropriate mitigation measures from a multi-modal perspective.

ME-C.9 Implement best practices for multi-modal quality/level of service analysis guidelines to evaluate potential transportation improvements from a multi-modal perspective in order to determine optimal improvements that balance the needs of all users of the right of way.

ME-E.7 Consider transportation demand management (TDM) programs with achievable trip reduction goals as partial mitigation for development project traffic and air quality impacts.

ME-F.1 Implement the Bicycle Master Plan, which identifies existing and future needs, and provides specific recommendations for facilities and programs over the next 20 years.

b. Coordinate with other local jurisdictions, SANDAG, schools, and community organizations to review and comment on bicycle issues of mutual concern.

ME-F.2 Identify and implement a network of bikeways that are feasible, fundable, and serve the bicyclists' needs, especially for travel to employment centers, village centers, schools, commercial districts, transit stations, and institutions.

### City of San Diego *Street Design Manual*

The City's *Street Design Manual* (2017) provides information and guidance for the design of public right-of-way that accommodates a variety of potential users, including motorists, pedestrians, and bicyclists. The *Street Design Manual* is divided into six sections: Roadway Design, Pedestrian Design, Traffic Calming, Street Lighting, Parkway Configurations, and Design Standards. The guidelines are focused on the development of new or undeveloped areas as well as redeveloping areas and are not intended to supersede other guidelines developed in other local planning documents, such as community plans, specific plans, and RTPs.

### City of San Diego Bicycle Master Plan

The City of San Diego Bicycle Master Plan (2013) provides a framework for making cycling a more practical and convenient transportation option for San Diegans with different riding purposes and skill levels. The Bicycle Master Plan is a 20-year policy document that guides the development and maintenance of San Diego's bicycle network. The bicycle network includes all roadways that bicyclists have the legal right to use, support facilities, and non-infrastructure programs. The plan includes direction for policymakers on the expansion of the existing bikeway network, connecting gaps, addressing constrained areas, improving intersections, providing for greater local and regional connectivity, and encouraging more residents to bicycle more often.

### City of San Diego Pedestrian Master Plan

The City of San Diego Pedestrian Master Plan (2006) provides guidelines to the City that will enhance neighborhood quality and mobility options through the facilitation of pedestrian improvement projects. The Pedestrian Master Plan both identifies and prioritizes pedestrian improvement projects through technical analysis and community input programs, which are typically grant-funded.

# 4.13.4 Impact Analysis

## 4.13.4.1 Methodology

As noted in Section 4.13.1, *Overview,* the District has traditionally followed the City of San Diego's *Traffic Impact Study Manual* (1998), which uses LOS for the evaluation of potential transportation-

related impacts related to proposed projects. However, with adoption of SB 743 and the accompanying changes to the State CEQA Guidelines, all jurisdictions within the State of California, including the District, are now required to utilize VMT, rather than LOS, as the metric for evaluating and identifying significant transportation-related impacts. Specifically, automobile delay, as measured by LOS and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA (State CEQA Guidelines Section 15064.3(b). As such, to comply with SB 743, this transportation analysis only uses VMT to determine the significance of transportation impacts. The following details the methodology for evaluating VMT generated by the Proposed Program.

OPR does not provide guidance regarding standards or requirements for schools (traditional, charter, or private) under SB 743. However, OPR's Technical Advisory identifies increasing "access to common goods and services, such as groceries, schools, and daycare" as potential measures to reduce VMT. Increasing the amount of schools in an area is one means to increase school access and thus reduce VMT. Public schools are similar to "local retail," as defined in the OPR Technical Advisory, in that they typically do not generate new trips but rather redistribute existing trips. As a result, the provision of these types of services in certain areas can generally reduce VMT by shortening the distance individuals would otherwise have to travel to them.

Per the OPR Technical Advisory, retail uses that would result in a net increase in VMT may indicate a significant transportation impact. Therefore, because of the similarities between retail and school uses from a VMT perspective, the impact analysis evaluates whether school uses under the Proposed Program would increase VMT. Specifically, an increase in VMT per student would be identified as a significant transportation impact. It is important to note that the District intends to fully comply with the SB 743 mandate and will be utilizing VMT as the standard for analyzing transportation impacts on all future projects carried out under the Proposed Program. Transportation operations at intersections and roadway segments adjacent to, or providing access to, schools will continue to be analyzed on a project-by-project basis, particularly in instances where future projects propose capacity increases (i.e., new school construction), changes to site access, or when future projects would encroach into the City's right-of-way.

The analysis approach is predicated upon the following assumptions:

- The Proposed Program is intended to provide a quality school in every neighborhood through repairs, renovation, and revitalization of District schools.
- The Proposed Program is anticipated to result in students currently enrolled in charter schools on District-owned properties, private schools, and inter-district transfers, as well as future students to enroll in their neighborhood or local District school.
- If a student changes schools or enrolls in a District school as a result of the Proposed Program improvements, they will be returning to or enrolling in their assigned District school because it is the closest school to their home address.
- As a worst-case scenario, every traditional District school was assumed to operate at full enrollment capacity under buildout of the Proposed Program.
- Charter school enrollment assumptions under Proposed Program conditions were the same as Existing Conditions as there is no information detailing anticipated increases or decreases in enrollment or capacity at the individual charter schools.

## Calculations

The following factors were taken into account in determining the potential change in VMT per student and are further described throughout this section:

- School enrollment
- Average student trip length calculation (traditional and charter/private schools)
- School staff calculation
- Trip generation
- Average staff trip length calculation
- VMT calculation

### School Enrollment

To account for the year-to-year fluctuations in student enrollment, 10 years of student enrollment data (2009–2018) was reviewed for each District school (including charter schools on District-owned properties) to develop average enrollment. In some instances, traditional or charter schools on District-owned properties changed the grade ranges served during the 10-year data period, in which case only enrollment data for years with grade ranges consistent with the 2018–2019 school year were utilized when developing the average enrollment. For example, if a school added fifth grade in the 2017–2018 school year and continued offering fifth grade during the 2018–2019 school year, only enrollment data from those two most recent school years was considered. Similarly, if a grade was discontinued at a school, only the enrollment data for grades offered during the 2018–2019 school year was utilized in developing the average enrollment. Additionally, Independent Study students were removed from average enrollment for all schools considering daily trips to the respective school are not assumed for these students.

Future conditions were evaluated using the enrollment capacity of each school for the 2018–2019 school year as provided by the District, conservatively assuming the Proposed Program improvements may result in shifting students back to—or future students enrolling in—their assigned traditional public school. It should be noted that the enrollment capacity of a school can be fluid and can change based on a number of factors. Therefore, the assumed capacity for each school site is theoretical and should only be used for the purpose of a worst-case analysis, as done in this analysis.

Table 4.13-7 displays the total enrollment capacity for each cluster compared to the average total enrollment for the cluster (also see Table 4.13-2). As shown, the smallest change is an increase of 559 students (La Jolla cluster) while the greatest change is an increase of 7,627 students (Lincoln cluster).

**Table 4.13-7. Change in Student Enrollment by Cluster with the Proposed Program**

| Cluster | Average Enrollment | Total Capacity | Δ in Students |
|---|---|---|---|
| Clairemont | 3,760 | 5,895 | 2,135 |
| Crawford | 7,211 | 11,642 | 4,431 |
| Henry | 8,418 | 10,809 | 2,391 |
| Hoover | 9,931 | 16,316 | 6,385 |
| Kearny | 7,311 | 11,547 | 4,236 |
| La Jolla | 4,170 | 4,729 | 559 |
| Lincoln | 11,861 | 19,488 | 7,627 |
| Madison | 3,481 | 7,257 | 3,776 |
| Mira Mesa | 9,056 | 12,782 | 3,726 |
| Mission Bay | 3,100 | 5,232 | 2,132 |
| Morse | 8,555 | 14,391 | 5,836 |
| Point Loma | 8,761 | 12,015 | 3,254 |
| San Diego | 15,878 | 23,400 | 7,522 |
| Scripps Ranch | 7,057 | 9,103 | 2,046 |
| Serra | 6,144 | 8,246 | 2,102 |
| University City | 5,801 | 7,152 | 1,351 |
| **Total** | **120,495** | **180,004** | **59,509** |

Source: Appendix J.

## Average Student Trip Length (Traditional Schools)

Average estimated commute trip lengths for every school within the Program area was estimated utilizing shortest path network analysis. A network route is generated from every populated census block center point within a school's attendance boundary to the main school entrance. The routes are subsequently weighted by the population of each census block origin to most accurately approximate the schoolwide average travel distance given the distribution of residential populations. The specific data inputs and calculation methods for determining average student trip length are provided in Appendix J.

Table 4.13-8 displays the average student trip length for each cluster under Proposed Program conditions compared to the existing average student trip length (also see Table 4.13-3).

**Table 4.13-8. Change in Average Student Trip Length by Cluster**

| Cluster | Existing Average Student Trip Length (miles) | Proposed Program Average Student Trip Length (miles) | Δ in Average Student Trip Length (miles) |
|---|---|---|---|
| Clairemont | 1.33 | 1.36 | **0.03** |
| Crawford | 1.02 | 0.92 | -0.09 |
| Henry | 1.94 | 1.87 | -0.07 |
| Hoover | 0.92 | 0.82 | -0.10 |
| Kearny | 2.14 | 1.84 | -0.30 |
| La Jolla | 2.06 | 2.05 | -0.01 |
| Lincoln | 1.16 | 1.07 | -0.09 |
| Madison | 1.00 | 0.95 | -0.05 |
| Mira Mesa | 1.14 | 1.14 | 0.00 |
| Mission Bay | 1.20 | 1.17 | -0.03 |
| Morse | 1.20 | 1.14 | -0.07 |
| Point Loma | 3.35 | 2.87 | -0.48 |
| San Diego | 1.72 | 1.51 | -0.22 |
| Scripps Ranch | 2.27 | 2.16 | -0.11 |
| Serra | 1.08 | 1.10 | **0.01** |
| University City | 3.05 | 2.74 | -0.31 |

Source: Appendix J.

As shown, the average student trip length is anticipated to stay the same or decrease within all but two clusters (Clairemont and Serra clusters). The changes in average student trip lengths are dependent on which traditional District public schools have capacity, how much capacity is available, and the average student trip length for the schools with capacity, as well as the presence and average student trip length of charter schools on District-owned properties.

For example, if a school with a great amount of capacity has an average student trip length that is less than the cluster average, and no other schools within the cluster have capacity, the average student trip length under Proposed Program conditions would be shorter than the existing average student trip length. Conversely, if a school with a great amount of capacity has an average student trip length that is longer than the cluster average, and no other schools within the cluster have capacity, the average student trip length under Proposed Program conditions would be longer than the existing average student trip length.

## Average Student Trip Length (Charter/Private Schools)

Average estimated commute trip lengths for every charter school on District-owned property within the Program area was also assessed utilizing shortest path network analysis. Private schools, like charter schools, do not have attendance boundaries. Due to the unavailability of data for private schools, charter school data was used as a proxy.

Charter school attendance data was obtained from the District for schools located on District-owned properties. The attendance data for each charter school identifies the percent of enrolled students residing in each traditional public school's attendance boundary. To obtain the average commute trip length for charter/private schools, a network route was generated from every traditional public

school attendance boundary centroid point to the main entrance of the charter school. The number of students from each assigned attendance boundary that would otherwise be attended was applied to each route for each respective school to approximate the schoolwide average travel distance. The specific data inputs and calculation methods for determining average student trip length are provided in Appendix J.

## Trip Generation

Trip generation rates were used in the development of VMT estimates and were obtained from the City of San Diego's *Trip Generation Manual* (2003) for elementary schools, junior high/middle schools, and high schools as follows:

- Elementary School = 2.9 trips/student
- Junior High/Middle School = 1.4 trips/student
- High School = 1.8 trips/student

## School Staff Estimation

In addition, the number of existing and forecasted school staff was calculated by applying a student-to-staff ratio to the future enrollment estimations at buildout of the Proposed Program. The ratio was developed using estimates from the 2018–2019 school year:

- Grades K–2 = 24:1 student-to-staff ratio
- Grades 4–6 = 32.13:1 student-to-staff ratio
- Grades 7–8 = 28.73:1 student-to-staff ratio
- Grades 9–12 = 29.13:1 student-to-staff ratio

Due to the overlap in grades that occur at different school types, the categories were consolidated to better reflect the school types analyzed (elementary school, junior high/middle school, and high school). The ratios for grades K–3 and 4–6 were averaged together to account for the overlap in grades that occurs at elementary schools (generally grades K–5). Similarly, grades 4–6 and 7–8 were averaged together to represent junior high/middle schools (generally grades 6–8). No modifications were made to grades 9–12 student-to-staff ratios as these are the grades accounted for under typical high school enrollment. The ratios from above were then applied to the existing enrollment and school capacities to estimate the total number of staff members at each school. Estimated student to staff ratios are as follows:

- Elementary School = 28:1 student-to-staff ratio
- Junior High/Middle School = 30:1 student-to-staff ratio
- High School = 29:1 student-to-staff ratio

Table 4.13-9 displays the anticipated staff for each cluster under Proposed Program conditions compared to the existing staff by cluster (also see Table 4.13-5). Consistent with the difference between enrollment capacity and enrollment by cluster presented in Table 4.13-7, changes in staff levels range from a low of 20 additional staff (La Jolla cluster) to a high of 267 additional staff (Lincoln cluster).

**Table 4.13-9. Change in Staff by Cluster**

| Cluster | Existing Average Staff | Proposed Program Total Staff | Δ in Total Staff |
|---|---|---|---|
| Clairemont | 134 | 208 | 74 |
| Crawford | 259 | 413 | 154 |
| Henry | 297 | 381 | 84 |
| Hoover | 352 | 575 | 223 |
| Kearny | 266 | 412 | 146 |
| La Jolla | 146 | 166 | 20 |
| Lincoln | 422 | 689 | 267 |
| Madison | 125 | 258 | 133 |
| Mira Mesa | 317 | 448 | 131 |
| Mission Bay | 110 | 182 | 72 |
| Morse | 305 | 510 | 205 |
| Point Loma | 308 | 420 | 112 |
| San Diego | 574 | 834 | 260 |
| Scripps Ranch | 248 | 319 | 71 |
| Serra | 216 | 288 | 72 |
| University City | 204 | 250 | 46 |
| **Total** | **4,283** | **6,353** | **2,070** |

Source: Appendix J.

### Average Staff Trip Length

School staff trip lengths were accounted for in addition to student trip lengths, although using adifferent approach considering staff members do not have attendance boundaries like students. The average one-way commute distance of 16.4 miles for employees in San Diego County was assumed for staff. This distance was obtained from SANDAG's 2018 Commute Behavior Survey, which draws from a survey of more than 4,000 people in the region. The trip length was used in combination with the school staff ratio calculations to develop staff VMT estimates for each school.

It should be noted that this approach is very conservative considering vehicle trips associated with staff are accounted for in the City of San Diego's trip generation rates for schools.

## Vehicle Miles Traveled

VMT was calculated for each cluster by analyzing each traditional public school and charter school on District-owned properties within the respective cluster using the following steps:

1. Multiply the school's average enrollment (existing) or capacity (future) by the respective trip generation rates listed above.
2. Multiply the product from Step 1 by the average trip length for the respective school to get the daily VMT value for each school for student-related trips.
3. Develop the school staff estimate by applying the student-to-staff ratio to the school's average enrollment (existing) or capacity (future).

4. Multiply the product from Step 3 by the assumed staff commute distance (16.4 miles each way).
5. For each school, add the product from Step 2 (student VMT) with the product from Step 4 (staff VMT), resulting in a school VMT estimate.
6. Finally, the products from Step 5 (school VMT estimate) for each school within a respective cluster are summed together and divided by the cluster's total average enrollment (existing) or capacity (future), resulting in a VMT per student estimate for each of the 16 District clusters.

The Proposed Program was evaluated for impacts based on the District-wide average VMT per student and a significant impact would result from an increase in the average VMT per student.

## 4.13.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining significance of transportation impacts resulting from the Proposed Program. The determination of whether a transportation impact would be significant is based on the thresholds described below and the professional judgement of the District as the Lead Agency and recommendations of qualified personnel at ICF and Chen Ryan Associates, all of which is based on the evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following.

1. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).
3. Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
4. Result in inadequate emergency access.

## 4.13.4.3 Impacts and Mitigation Measures

***Threshold 1: Would the Proposed Program conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?***

### Program-Level Analysis

As discussed in Section 4.13.3.3, *Local,* the District's various educational facilities, administrative sites, and vacant parcels are within the land use jurisdiction and control of the District. However, because the streets and intersections serving these properties are within the City's jurisdiction, local policies, regulations, and plans related to the circulation system were considered in the analysis of this threshold.

## New Acquisition and New School or Administrative Facilities

### Impact Discussion

#### *Construction*

Impacts on the circulation system, including transit, roadway, bicycle, and pedestrian facilities could occur if the Proposed Program would conflict with the programs, plans, ordinances, or policies related to these facilities. During construction activities associated with new school or administrative facilities, construction vehicles would use the roadways that surround the project site to deliver materials and haul construction debris. Roadway users could experience temporary delays during material deliveries, but these delays would be both brief and infrequent. Therefore, they would not affect overall traffic circulation in the vicinity of a new school or administrative facility construction project. In addition, construction staging for these projects typically occurs on site and generally would not affect traffic operations on adjacent roadways or the use of bicycle, pedestrian, or transit facilities. Construction activities would not impede non-motorized travel or public transit in the vicinity of these future projects. Any temporary traffic control during construction would meet the requirements of the *California Manual on Uniform Traffic Control Devices* (Caltrans 2014), and the District's traffic control specifications, as detailed in Section 4.13.3, above, which require compliance with the requirements of the authorities having jurisdiction over the roadways; protection of existing site improvements, including curbs, pavements, and utilities; and access to fire hydrants or other fire-fighting equipment. Impacts would be less than significant.

#### *Operation*

In general, operations associated with administrative facilities would not interfere with or remove any transit, bicycle, or pedestrian facilities and would not require the addition of new lanes or other changes to roadways. However, new schools could introduce new pick-up/drop-off zones or new driveways along high volume roadways that include pedestrian, bicycle, or transit routes. In addition, some students rely on transit, pedestrian, and bicycle facilities to travel to and from school, and the addition of new vehicular traffic to roadways with these facilities could create safety conflicts. As such, new site access points could shift vehicular traffic traveling to and from a school to different routes that include pedestrian and bicycle facilities, which could conflict with San Diego General Plan policies related to maintaining safe and effective pedestrian and bicycle routes to schools, including, but not limited to, Policies ME-A.2, ME-A.9, ME-F.1, or ME-F.2 (see local policies and regulations in Section 4.13.3.3). Conflicts with these policies could result in safety hazards or effective operations of these facilities. Therefore, a significant impact could occur (**Impact-TRA-1**).

**MM-TRA-1** and **MM-TRA-2** would be required, which entail the preparation of plans for any schools that would involve increased capacity or adjustments to site access to identify safe routes to schools for pedestrians and bicyclists and create safe and efficient pick-off/drop-off zones. Preparation of a Safe Routes to School Plan and a Pick-up/Drop-off Plan to reduce safety hazards associated with vehicular congestion on area roadways and identify safe routes for pedestrians, bicyclists, and transit facilities would ensure that the project is consistent with the City's policies related to safe and effective performance of pedestrian, bicycle, and transit facilities. Therefore, with implementation of mitigation, **Impact-TRA-1** would be reduced to less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with new school or administrative facilities would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

#### *Operation*

**Impact-TRA-1: Conflict with Policies Related to Safe and Effective Pedestrian and Bicycle Routes to School and Result in Potential Safety Hazards During Operation of a New School.** New school construction could introduce new site access points and new pick-up/drop-off zones along roadways that include pedestrian, bicycle, and transit facilities, which could result in safety conflicts between the different users of the roadway or affect operations of these facilities. This would conflict with the City of San Diego's plans and policies addressing the circulation system, including roadway, pedestrian, bicycle, and transit facilities. This is a potentially significant impact.

### Mitigation Measures

For **Impact-TRA-1**:

**MM-TRA-1: Develop a Safe Routes to School Plan.** During the planning phases for new schools or whole site modernizations, the District shall continue to coordinate with the City of San Diego to develop a Safe Routes to School (SRTS) Plan to ensure safe and efficient access for students walking and bicycling to school. If a SRTS Plan exists, the District shall update the plan to reflect project improvements. The District shall consider the SRTS and its effectiveness at mitigating project-specific impacts prior to approvals of applicable subsequent projects under the plan.

**MM-TRA-2: Develop a Pick-up/Drop-off Plan.** During the planning phases for new schools or whole site modernizations, the District shall prepare a student pick-up/drop-off plan for all schools to ensure safety for all modes and to minimize disruptions resulting from project-related traffic. The pick-up/drop-off plan should identify any temporary controls and staff requirements (crossing guards, cones, signage, restrictions) and designate appropriate queuing areas and routes. Consistent with California Department of Education policy, pick-up/drop-off areas shall adhere to California Code of Regulations, Title 5, Section 14030 site design standards. The District shall consider the pick-up/drop-off plan and its effectiveness at mitigating project-specific impacts prior to approvals of applicable subsequent projects under the plan.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with new school or administrative facilities projects would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

### *Operation*

**MM-TRA-1** and **MM-TRA-2** require that the District prepare plans for any schools that would increase capacity or adjust site access; these plans would identify safe routes to schools for pedestrians and bicyclists and create safe and efficient pick-off/drop-off zones. Preparation of a Safe Routes to School Plan and a Pick-up/Drop-off Plan to reduce safety hazards associated with vehicular congestion on area roadways and identify safe routes for pedestrians, bicyclists, and transit facilities would ensure that the project is consistent with the City's policies related to safe and effective performance of pedestrian, bicycle, and transit facilities. Therefore, with implementation of mitigation, **Impact-TRA-1** would be reduced to less than significant.

## Whole Site Modernization

### Impact Discussion

### *Construction*

Impacts on the circulation system, including transit, roadway, bicycle, and pedestrian facilities could occur if the Proposed Program would conflict with the programs, plans, ordinances, or policies related to these facilities. During construction activities associated with whole site modernizations, construction vehicles would use the roadways that surround the project site to deliver materials and haul construction debris. Roadway users could experience temporary delays during material deliveries, but these delays would be both brief and infrequent. Therefore, they would not affect overall traffic circulation in the vicinity of a whole site modernization project. In addition, construction staging for these projects typically occurs on site and generally would not affect traffic operations on adjacent roadways or the use of bicycle, pedestrian, or transit facilities. Construction activities would not impede non-motorized travel or public transit in the vicinity of these future projects. Any temporary traffic control during construction would meet the requirements of the *California Manual on Uniform Traffic Control Devices* (Caltrans 2014), and the District's traffic control specifications, as detailed in Section 4.13.3, above, which require compliance with the requirements of the authorities having jurisdiction over the roadways; protection of existing site improvements, including curbs, pavements, and utilities; and access to fire hydrants or other fire-fighting equipment. Impacts would be less than significant.

### *Operation*

Whole site modernization projects could result in changes to site access at an existing school site, which could change routes for vehicles traveling to and from school and could shift vehicular, bicycle, or pedestrian traffic to congested roadways in the vicinity of the school. In addition, some students rely on transit, pedestrian, and bicycle facilities to travel to and from school, and the addition of new vehicular traffic to roadways with these facilities could create safety conflicts. As such, a change in site access could shift vehicular traffic traveling to and from a school to different routes that include pedestrian and bicycle facilities, which could conflict with San Diego General Plan policies related to maintaining safe and effective pedestrian and bicycle routes to schools, including, but not limited to, Policies ME-A.2, ME-A.9, ME-F.1, or ME-F.2 (see local policies and regulations in Section 4.13.3.3). Conflicts with these policies could result in safety hazards or interfere with the effective operations of these facilities. Therefore, a significant impact could occur (**Impact-TRA-2**).

**MM-TRA-1** and **MM-TRA-2** would be required, which entail the preparation of plans for any schools that would involve increased capacity or adjustments to site access. These plans would identify safe routes to schools for pedestrians and bicyclists and create safe and efficient pick-off/drop-off zones. Preparation of a Safe Routes to School Plan and a Pick-up/Drop-off Plan to reduce safety hazards associated with vehicular congestion on area roadways and identify safe routes for pedestrians, bicyclists, and transit facilities would ensure that the project is consistent with the City's policies related to safe and effective performance of pedestrian, bicycle, and transit facilities. Therefore, with implementation of mitigation, **Impact-TRA-2** would be reduced to less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with whole site modernization projects would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

#### *Operation*

**Impact-TRA-2: Conflict with Policies Related to Safe and Effective Pedestrian and Bicycle Routes to School and Result in Potential Safety Hazards During Operation of a Whole Site Modernization Project**. Whole site modernization projects could change site access and shift travel routes for existing traffic traveling to and from the school to different roadways as a result of new pick-up/drop-off zones or new driveways. Changes to site access along roadways that include pedestrian, bicycle, and transit facilities could result in safety conflicts between the different users of the roadway or affect operations of these facilities. This would conflict with the City's plans and policies addressing the circulation system, including roadway, pedestrian, bicycle, and transit facilities. This is a potentially significant impact.

### Mitigation Measures

For **Impact-TRA-2**:

Implement **MM-TRA-1** and **MM-TRA-2**, as described above.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with whole site modernization projects would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

#### *Operation*

**MM-TRA-1** and **MM-TRA-2** require the District to prepare plans for any schools that would increase capacity or adjust site access; these plans would identify safe routes to schools for pedestrians and bicyclists and create safe and efficient pick-off/drop-off zones. Preparation of a Safe Routes to School Plan and a Pick-up/Drop-off Plan to reduce safety hazards associated with vehicular congestion on area roadways and identify safe routes for pedestrians, bicyclists, and transit facilities would ensure that the project is consistent with the City's policies related to safe and effective

performance of pedestrian, bicycle, and transit facilities. Therefore, with implementation of mitigation, **Impact-TRA-2** would be reduced to less than significant.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would all be contained within the project sites and would not have the potential to conflict with programs, plans, ordinances, or policies related to transit, roadway, bicycle, or pedestrian facilities. Therefore, upgrades of existing school and administrative sites would result in no impacts related to this criterion.

#### *Operation*

Operational activities associated with upgrades of existing school and administrative facilities would all be contained within the project sites and would not have the potential to affect external transit, roadway, bicycle, or pedestrian facilities. Therefore, this project category would not conflict with any policies related to those facilities, and there would be no impacts related to this criterion.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. There would be no impacts.

#### *Operation*

Operational activities associated with upgrades of existing school and administrative sites would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. There would be no impacts.

### Mitigation Measures

None required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. There would be no impacts.

***Operation***

Operational activities associated with upgrades of existing school and administrative sites would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. There would be no impacts.

## Joint Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

***Construction***

Construction activities associated with joint-use facilities development would all be contained within the project sites and would not have the potential to conflict with programs, plans, ordinances, or policies related to transit, roadway, bicycle, or pedestrian facilities. Therefore, this project category would result in no impacts related to this criterion.

***Operation***

Operational activities associated with joint-use facilities development would all be contained within the project sites and would not have the potential to affect external transit, roadway, bicycle, or pedestrian facilities. Therefore, this project category would not conflict with any policies related to those facilities, and there would be no impacts related to this criterion.

### Level of Significance Prior to Mitigation

***Construction***

Construction activities associated with joint-use facilities development would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. There would be no impacts.

***Operation***

Operational activities associated with joint-use facilities development would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. There would be no impacts.

### Mitigation Measures

None required.

### Level of Significance After Mitigation

***Construction***

Construction activities associated with joint-use facilities development would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. There would be no impacts.

***Operation***

Operational activities associated with joint-use facilities development would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. There would be no impacts.

# Site-Specific Analysis

## Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.13-10. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the whole site modernization project category.

**Table 4.13-10. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019.

### Construction

As discussed above under the program-level analysis, construction activities associated with whole site modernization projects would involve increased use of roadways surrounding the project site

by construction vehicles to deliver materials and haul construction debris. Roadway users could experience temporary delays during material deliveries, but these delays would be both brief and infrequent. Therefore, they would not affect overall traffic circulation in the vicinity of a whole site modernization. In addition, construction staging for these projects typically occurs on site and generally would not affect traffic operations on adjacent roadways or the use of bicycle, pedestrian, or transit facilities. Construction activities would not impede non-motorized travel or public transit in the vicinity of the site. Any temporary traffic control during construction would meet the requirements of the *California Manual on Uniform Traffic Control Devices* (Caltrans 2014), and the District's traffic control specifications, as detailed in Section 4.13.3, above, which require compliance with the requirements of the authorities having jurisdiction over the roadways; protection of existing site improvements, including curbs, pavements, and utilities; and access to fire hydrants or other fire-fighting equipment. Impacts would be less than significant.

#### Operation

As discussed above under the *Program-Level Analysis* for this threshold, whole site modernization projects, such as the 21 near-term projects, could result in changes to site access at an existing site, which could change routes for vehicles traveling to and from school and could shift vehicular, bicycle, or pedestrian traffic to congested roadways in the vicinity of the school. However, some students rely on transit, pedestrian, and bicycle facilities to travel to and from school, and the addition of new vehicular traffic to roadways with these facilities could create safety conflicts. As such, changes in site access could shift vehicular traffic traveling to and from a school to different routes that include pedestrian and bicycle facilities, which could conflict with San Diego General Plan policies related to maintaining safe pedestrian and bicycle routes to schools, including, but not limited to, Policies ME-A.2, ME-A.9, ME-C.2, ME-F.1, or ME-F.2 (see local policies and regulations in Section 4.13.3.3). Therefore, a significant impact could occur (**Impact-TRA-2**).

**MM-TRA-1** and **MM-TRA-2** would be required, which entail the preparation of plans for any schools that would involve increased capacity or adjustments to site access to identify safe routes to schools for pedestrians and bicyclists and create safe and efficient pick-off/drop-off zones. Preparation of a Safe Routes to School Plan and a Pick-up/Drop-off Plan to reduce safety hazards associated with vehicular congestion on area roadways and identify safe routes for pedestrians, bicyclists, transit facilities would ensure that the project is consistent with the City's policies related to safe and effective performance of pedestrian, bicycle, and transit facilities. Therefore, with implementation of mitigation, **Impact-TRA-2** would be reduced to less than significant.

## Level of Significance Prior to Mitigation

#### Construction

Construction activities associated with near-term, site-specific whole site modernization projects would not conflict with programs, plans, policies, or ordinances addressing the circulation system. Impacts would be less than significant.

#### Operation

**Impact-TRA-2: Conflict with Policies Related to Safe and Effective Pedestrian and Bicycle Routes to School and Result in Potential Safety Hazards During Operation of a Whole Site Modernization Project.** Whole site modernizations could change site access and shift travel routes

for existing traffic traveling to and from the school to different roadways as a result of new pick-up/drop-off zones or new driveways. Changes to site access along roadways that include pedestrian, bicycle, and transit facilities could result in safety conflicts between the different users of the roadway or affect operations of these facilities. This would conflict with the City's plans and policies addressing the circulation system, including roadway, pedestrian, bicycle, and transit facilities. This is a potentially significant impact.

### Mitigation Measures

For **Impact-TRA-2**:

Implement **MM-TRA-1** and **MM-TRA-2**, as described above.

### Level of Significance After Mitigation

#### Construction

Construction activities associated with near-term, site-specific whole site modernization projects would not conflict with programs, plans, policies, or ordinances addressing the circulation system. Impacts would be less than significant.

#### Operation

**MM-TRA-1** and **MM-TRA-2** require the District to prepare plans for any schools that would increase capacity or adjust site access to identify safe routes to schools for pedestrians and bicyclists and create safe and efficient pick-off/drop-off zones. Preparation of a Safe Routes to School Plan and a Pick-up/Drop-off Plan to reduce safety hazards associated with vehicular congestion on area roadways and identify safe routes for pedestrians, bicyclists, transit facilities would ensure that the project is consistent with the City's policies related to safe and effective performance of pedestrian, bicycle, and transit facilities. Therefore, with implementation of mitigation, **Impact-TRA-2** would be reduced to less than significant.

## *Threshold 2: Would the Proposed Program conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)?*

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

Construction details of future projects carried out under the Proposed Program are currently unknown at this time and could span over numerous years. Construction activities associated with the Proposed Program would potentially include grading and excavation, paving and pavement removal, filling and compaction, and demolition and construction of buildings. It is anticipated that construction workers would primarily be drawn from existing residents of the City of San Diego and surrounding area. As such, construction worker VMT would not be newly generated, but rather

would be redistributed throughout the transportation network based on workers' travel to different work sites each day. Accordingly, construction worker VMT is merely a redistribution of VMT that would otherwise be generated at other construction sites throughout the San Diego region. This redistribution is considered to be nominal and temporary. It is important to note that construction traffic is temporary and not expected to significantly increase VMT or permanently degrade operations of a roadway facility.

Additionally, the goals of SB 743, as stated in the legislative text, include reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of multimodal transportation systems, and providing clean, efficient access to destinations. The legislative text of SB 743 further states that it is the intent of the Legislature to balance the need for LOS standards for traffic with the need to build infill housing and mixed-use commercial developments within walking distance of mass transit facilities, downtowns, and town centers. Therefore, based on the legislative intent of SB 743, which focuses on long-term VMT reductions through smart growth and planning, the temporary generation of VMT from construction traffic is not expected to substantially increase VMT in the region such that it could contribute to long-term adverse environmental effects from increases in greenhouse gas and criteria pollutant emissions or hinder the promotion of multimodal transportation systems or implementation of clean, efficient access to destinations; and project's with temporary effects on VMT and the transportation system are not deemed to be significant. Consequently, VMT impacts would be less than significant during future construction activities associated with the Proposed Program.

***Operation***

New acquisition would be an administrative procedure and would not directly result in any physical changes to the environment. However, once the site has been acquired, the construction of a new school or administrative facility on that site would increase student capacity and/or staff employment at that location, which would generate new vehicle trips. In most cases, development of a new school would occur to accommodate a student population within a cluster where student population may have increased beyond the capacity of the existing schools, or where there may be a lack of schools to accommodate the existing population. For example, increased student population could occur in an area that has experienced a growth in residential development. Therefore, similar to a local retail use (see Section 4.13.4.1), a new school would result in the redistribution of existing VMT, which could reduce overall VMT within the cluster, depending on the school's location. However, because the locations of any new school or administrative facilities are not currently known, the variables contributing to trip length, including the facility location and roadway network configuration, attendance boundary size, and presence and density of residential land uses, are also currently unknown. As such, the potential exists for the operation of a new school or administrative facility to increase VMT within the cluster in which it would be located. Therefore, for the reasons cited above, any increase in capacity has the potential to increase VMT, which could result in a conflict with State CEQA Guidelines Section 15064.3, subdivision (b). Therefore, new school or administrative facilities have the potential to result in a significant VMT impact under this criterion (**Impact-TRA-3**).

**MM-TRA-3** and **MM-TRA-4** would be required, which would help reduce any increase in VMT resulting from increased student capacity that could occur from construction of new school or administrative facilities. However, because the actual VMT reductions that would be achieved with implementation of these measures cannot be quantified at this programmatic level, it cannot be

definitively concluded that these measures would reduce new VMT generation to less-than-significant levels. Therefore, this impact remains significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with new school or administrative facilities would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant.

#### *Operation*

**Impact-TRA-3: Potential to Generate Increased Vehicle Miles Traveled Within the Program Area Due to Increased Student Capacity or New Staff.** New school or administrative facilities have the potential to increase student capacity within a cluster, which could generate an increase in vehicle miles traveled (VMT) within the Program area. This would be considered a conflict with State CEQA Guidelines Section 15064.3, subdivision (b), which constitutes a potentially significant impact.

### Mitigation Measures

For **Impact-TRA-3:**

**MM-TRA-3: Prepare a Project-Specific Vehicle Miles Traveled Analysis**. For any new school or administrative facilities project, the District shall prepare a project-specific vehicle miles traveled (VMT) analysis during subsequent environmental review to evaluate the potential for an increase in VMT per student. If an increase in VMT per student is identified, the District shall implement **MM-TRA-4**.

**MM-TRA-4: Prepare a Transportation Demand Management Plan.** If results of the vehicle miles traveled (VMT) analysis identify increases in VMT per student, the District shall prepare a Transportation Demand Management (TDM) plan for that site to help reduce the number of vehicular trips by promoting transportation choices, including carpooling, walking, bicycling, and taking transit. The TDM plan should emphasize available regional resources (such as San Diego Association of Governments' iCommute program), provide carpool matching resources, and/or identify relevant transit information. The District shall consider the TDM and its effectiveness at mitigating project-specific impacts prior to approvals of applicable subsequent projects under the plan.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with new school or administrative facilities would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant.

***Operation***

Implementation of **MM-TRA-3** and **MM-TRA-4** would help reduce any increase in VMT resulting from increased student capacity that could occur from construction of new school or administrative facilities. However, because the actual VMT reductions that would be achieved with implementation of these measures cannot be quantified at this programmatic level, it cannot be definitively concluded that these measures would reduce new VMT generation to less-than-significant levels. Therefore, this impact remains significant and unavoidable.

## All Other Project Categories

### Impact Discussion

***Construction***

Construction details of future projects carried out under the Proposed Program are currently unknown at this time and could span over numerous years. Construction activities associated with the Proposed Program would potentially include grading and excavation, paving and pavement removal, filling and compaction, and demolition and construction of buildings. It is anticipated that construction workers would primarily be drawn from existing residents of the City of San Diego and surrounding area. As such, construction worker VMT would not be newly generated, but rather would be redistributed throughout the transportation network based on workers' travel to different work sites each day. Accordingly, construction worker VMT is merely a redistribution of VMT that would otherwise be generated at other construction sites throughout the San Diego region. This redistribution is considered to be nominal and temporary. It is important to note that construction traffic is temporary and not expected to significantly increase VMT or permanently degrade operations of a roadway facility.

Additionally, the goals of SB 743, as stated in the legislative text, include reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of multimodal transportation systems, and providing clean, efficient access to destinations. The legislative text of SB 743 further states that it is the intent of the Legislature to balance the need for LOS standards for traffic with the need to build infill housing and mixed-use commercial developments within walking distance of mass transit facilities, downtowns, and town centers. Therefore, based on the legislative intent of SB 743, which focuses on long-term VMT reductions through smart growth and planning, the temporary generation of VMT from construction traffic is not expected to substantially increase VMT in the region such that it could contribute to long-term adverse environmental effects from increases in greenhouse gas and criteria pollutant emissions or hinder the promotion of multimodal transportation systems or implementation of clean, efficient access to destinations; and projects with temporary effects on VMT and the transportation system are not deemed to be significant. Consequently, VMT impacts would be less than significant during future construction activities associated with the Proposed Program.

***Operation***

*VMT by Cluster*

Using the trip length information described in Section 4.13.4.1, VMT was calculated for Proposed Program conditions. Table 4.13-11 displays the VMT per student for each cluster under Proposed Program conditions compared to the existing VMT per student.

**Table 4.13-11. Change in Average Student Trip Length by Cluster**

| Cluster | Existing VMT/Cluster | Existing VMT/Student | Proposed Program VMT/Cluster | Proposed Program VMT/Student | Δ in VMT/Student |
|---|---|---|---|---|---|
| Clairemont | 14,635.28 | 3.89 | 22,798.65 | 3.87 | -0.02 |
| Crawford | 24,832.59 | 3.44 | 37,353.53 | 3.21 | -0.24 |
| Henry | 40,711.39 | 4.84 | 51,358.43 | 4.75 | -0.08 |
| Hoover | 30,284.49 | 3.05 | 46,187.91 | 2.83 | -0.22 |
| Kearny | 44,419.24 | 6.08 | 61,055.72 | 5.29 | -0.79 |
| La Jolla | 21,724.24 | 5.21 | 24,604.70 | 5.20 | -0.01 |
| Lincoln | 42,174.34 | 3.56 | 66,785.70 | 3.43 | -0.13 |
| Madison | 11,243.11 | 3.23 | 23,105.07 | 3.18 | -0.05 |
| Mira Mesa | 31,909.26 | 3.52 | 45,117.96 | 3.53 | **0.01** |
| Mission Bay | 11,100.87 | 3.58 | 18,119.90 | 3.46 | -0.12 |
| Morse | 32,082.07 | 3.75 | 52,100.23 | 3.62 | -0.13 |
| Point Loma | 67,431.48 | 7.70 | 79,956.86 | 6.65 | -1.04 |
| San Diego | 76,902.00 | 4.84 | 101,532.53 | 4.34 | -0.50 |
| Scripps Ranch | 40,001.43 | 5.67 | 50,224.23 | 5.52 | -0.15 |
| Serra | 20,013.03 | 3.26 | 26,977.93 | 3.27 | **0.01** |
| University City | 38,431.08 | 6.62 | 43,903.63 | 6.14 | -0.49 |
| **Total** | **547,895.92** | **4.55[1]** | **751,182.97** | **4.17[1]** | **-0.37[1]** |

Source: Appendix J.

[1] Overall average.

As shown, VMT per student is anticipated to remain the same or decrease in all but the following two clusters:

- Mira Mesa cluster (+0.01 VMT/student)
- Serra cluster (+0.01 VMT/student)

Similar to the changes in average student trip lengths under Proposed Program conditions presented in Table 4.13-8, the change in VMT per student is dependent on which traditional public schools have capacity, how much capacity is available, and the average student trip length for the schools with capacity, as well as the presence and average student trip length of charter schools on District-owned properties.

The two clusters that show an increase in VMT per student (Mira Mesa cluster and Serra cluster) both lack charter schools on District-owned properties. Therefore, the VMT per student under Proposed Program conditions at these clusters is dependent on the available capacity and average student trip length for those schools. Within these clusters, more capacity is available at schools with average student trip lengths that are greater than the cluster average under existing conditions, resulting in an average student trip length increase.

When considering all clusters together, the VMT per student is anticipated to be 4.17 miles, which is a decrease of -0.37 VMT per student (when rounded) compared to the existing VMT per student of 4.55 miles. Thus, it can be assumed that implementation of the Proposed Program as a whole would

result in a district-wide reduction in VMT per student. Therefore, the Proposed Program would result in less-than-significant VMT impacts.

#### Level of Significance Prior to Mitigation

##### *Construction*

Construction activities associated with whole site modernization projects, upgrades of existing school and administrative sites, and joint-use facilities would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant.

##### *Operation*

Operation associated with whole site modernization projects, upgrades of existing school and administrative sites, and joint-use facilities would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant.

#### Mitigation Measures

No mitigation is required.

#### Level of Significance After Mitigation

##### *Construction*

Construction activities associated with whole site modernization projects, upgrades of existing school and administrative facilities, and joint-use facilities would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant.

##### *Operation*

Operation of whole site modernization projects, upgrades of existing school and administrative facilities, and joint-use facilities would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant.

## Site-Specific Analysis

### Impact Discussion

#### Construction

Construction of the 21 near-term, site-specific whole site modernization projects would potentially include demolition, grading, paving, and construction of buildings. It is anticipated that construction workers would primarily be drawn from existing residents of the City of San Diego and surrounding area. Therefore, construction worker VMT would not be newly generated, but rather would be redistributed throughout the transportation network based on their travel to different work sites each day. This redistribution is considered to be nominal and temporary. It is important to note that construction traffic is temporary and not expected to significantly increase VMT or permanently degrade operations of a roadway facility. Consequently, VMT impacts would be less than significant during the construction activities associated with the near-term, site-specific whole site modernization projects.

### Operation

The VMT analysis for whole site modernizations was conducted by cluster. The 21 near-term, site-specific whole site modernization projects fall within the following clusters.

- Clairemont High School Cluster – Clairemont High
- Crawford High School Cluster – Euclid Elementary, Marshall Elementary, Oak Park Elementary
- Henry High School Cluster – Lewis Missile School
- Hoover High School Cluster – Rowan Elementary
- Kearny High School Cluster – Kearny High
- Lincoln High School Cluster – Baker Elementary, Valencia Park Elementary
- Madison High School Cluster – Madison High
- Mission Bay High School Cluster – Barnard Elementary, Crown Point Elementary, Pacific Beach Elementary
- Morse High School Cluster – Boone Elementary, Fulton K-8, Pacific View Leadership Elementary, Paradise Hills Elementary, Perry Elementary
- Point Loma High School Cluster – Correia Middle
- San Diego High School Cluster – Perkins K–8, Roosevelt Middle

As shown in Table 4.13-10, the per student VMT is expected to decrease in all of these clusters with implementation of a whole site modernization project. Therefore, VMT impacts associated with the near-term projects would be less than significant.

## Level of Significance Prior to Mitigation

### Construction

Because construction worker VMT is not newly generated and construction activities would result in a nominal and temporary redistribution of VMT, no permanent increase in VMT would result during construction of the near-term, site-specific whole site modernization projects. Impacts would be less than significant.

### Operation

The near-term, site-specific whole site modernization projects would result in less-than-significant impacts related to VMT.

## Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### Construction

Because construction worker VMT is not newly generated and construction activities would result in a nominal and momentary redistribution of VMT, no permanent increase in VMT would result during construction of the near-term, site-specific whole site modernization projects. Impacts would be less than significant.

#### Operation

The near-term, site-specific whole site modernization projects would result in less-than-significant impacts related to VMT.

***Threshold 3: Would the Proposed Program substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

Construction activities related to new school or administrative facilities would take place within their respective project sites and would not involve new geometric design features or incompatible uses. During construction activities associated with new school or administrative facilities, construction equipment would be stored at the project site temporarily but would be secured when not in use so as not to pose a hazard to the surrounding community or school operations. Any construction traffic control that is required would be conducted in accordance with the District's traffic control specifications, as detailed in Section 4.13.3, above, which require compliance with the requirements of the authorities having jurisdiction over the roadways; protection of existing site improvements, including curbs, pavements, and utilities; and access to fire hydrants or other fire-fighting equipment. In addition, flagging personnel would ensure that traffic congestion or blocked roads would not occur. However, this would not constitute a hazard due to geometric design features or incompatible uses, and impacts would be less than significant.

##### *Operation*

New school or administrative facilities and whole site modernization projects could include construction of new minor internal access driveways and new curb cuts along city streets. Any proposed curb cuts for new site access or pick-up/drop-off would need to be approved by the City of San Diego, which would ensure that proper site distances would be incorporated into the final design of the driveway to reduce potential hazards to vehicles while exiting the school site.

However, as discussed under Threshold 1, new school construction would increase student capacity at a new site and whole site modernizations could result in changes to site access, which have the

potential to increase pedestrian, bicycle, and vehicular traffic along the roadways adjacent to the schools. This increased traffic could occur adjacent to arterial or collector roadways that enable higher travel speeds and greater vehicular volumes, such as in areas near commercial uses. Increased student-generated pedestrian and bicycle traffic along these roadways would introduce incompatible uses, such as high pedestrian/bicyclist populations or pick-up/drop-off vehicles traveling slowly and making frequent stops along arterial or collector roadways where other users are traveling quickly potentially creating hazardous conditions. This combination of different modes of transportation and traveling speeds, for example, between the students and other users of the roadways could result in hazardous conditions, which would result in a significant impact (**Impact-TRA-1**).

**MM-TRA-1** and **MM-TRA-2** would be required, which would reduce hazards to students and other users of the roadways that could result from incompatible uses. A Safe Routes to School Plan uses various measures to ensure that pedestrian and bicyclists can arrive at school safely, including educating parents and students on safe walking and biking procedures, as well as offering potential engineering solutions to make the streets safer for all modes of transportation. A pick-up/drop-off plan would establish a safe and efficient procedure for student pick-up/drop-off, which would reduce conflicts between the various users of the roadway. These measures would reduce hazards associated with incompatible uses, and **Impact-TRA-1** would be reduced to less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant.

#### *Operation*

**Impact-TRA-1: Conflict with Policies Related to Safe and Effective Pedestrian and Bicycle Routes to School and Result in Potential Safety Hazards During Operation of a New School**. New school construction could introduce new site access points and new pick-up/drop-off zones along roadways that include pedestrian, bicycle, and transit facilities, which could result in safety conflicts between the different users of the roadway or affect operations of these facilities. This would conflict with the City of San Diego's plans and policies addressing the circulation system, including roadway, pedestrian, bicycle, and transit facilities. This is a potentially significant impact.

### Mitigation Measures

For **Impact-TRA-1**:

Implement **MM-TRA-1** and **MM-TRA-2**, as described above.

### Level of Significance After Mitigation

#### *Construction*

Construction activities would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant.

### *Operation*

**MM-TRA-1** and **MM-TRA-2** would reduce hazards to students and other users of the roadways that could result from incompatible uses. A Safe Routes to School Plan uses various measures to ensure that pedestrian and bicyclists can arrive at school safely, including educating parents and students on safe walking and biking procedures, as well as offering potential engineering solutions to make the streets safer for all modes of transportation. A pick-up/drop-off plan would establish a safe and efficient procedure for student pick-up/drop-off, which would reduce conflicts between the various users of the roadway. These measures would reduce hazards associated with incompatible uses, and **Impact-TRA-1** would be reduced to less than significant.

## Whole Site Modernization

### Impact Discussion

### *Construction*

Construction activities related to whole site modernization projects would take place entirely within a project site and would not involve new geometric design features or incompatible uses. During construction activities associated with whole site modernization projects, construction equipment would be stored at the project site temporarily but would be secured when not in use so as not to pose a hazard to the surrounding community or school operations. Any construction traffic control that is required would be conducted in accordance with the District's traffic control specifications, as detailed in Section 4.13.3, above, which require compliance with the requirements of the authorities having jurisdiction over the roadways; protection of existing site improvements, including curbs, pavements, and utilities; and access to fire hydrants or other fire-fighting equipment. In addition, flagging personnel would ensure that traffic congestion or blocked roads would not occur. This would not constitute a hazard due to geometric design features or incompatible uses, and impacts would be less than significant.

### *Operation*

Whole site modernization projects could include construction of new minor internal access driveways and new curb cuts along city streets. Any proposed curb cuts for new site access or pick-up/drop-off would need to be approved by the City of San Diego, which would ensure that proper site distances would be incorporated into the final design of the driveway to reduce potential hazards to vehicles while exiting the school site.

However, as discussed under Threshold 1, whole site modernization projects could result in changes to site access, which have the potential to increase pedestrian, bicycle, and vehicular traffic along the roadways adjacent to the schools. This increased traffic could occur adjacent to arterial or collector roadways that enable higher travel speeds and greater vehicular volumes, such as in areas near commercial uses. Increased student-generated pedestrian and bicycle traffic along these roadways would introduce incompatible uses, such as high pedestrian/bicyclist populations, or pick-up/drop-off vehicles traveling slowly and making frequent stops along arterial or collector roadways where other users are traveling quickly, potentially creating hazardous conditions. This combination of different modes of transportation and traveling speeds, for example, between the students and other users of the roadways could result in hazardous conditions, which would result in a significant impact (**Impact-TRA-2**).

**MM-TRA-1** and **MM-TRA-2** would reduce hazards to students and other users of the roadways that could result from incompatible uses. A Safe Routes to School Plan uses various measures to ensure that pedestrian and bicyclists can arrive at school safely, including educating parents and students on safe walking and biking procedures, as well as offering potential engineering solutions to make the streets safer for all modes of transportation. A pick-up/drop-off plan would establish a safe and efficient procedure for student pick-up/drop-off, which would reduce conflicts between the various users of the roadway. These measures would reduce hazards associated with incompatible uses, and **Impact-TRA-2** would be reduced to less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant.

#### *Operation*

**Impact-TRA-2: Conflict with Policies Related to Safe and Effective Pedestrian and Bicycle Routes to School and Result in Potential Safety Hazards During Operation of a Whole Site Modernization Project**. Whole site modernization projects could change site access and shift travel routes for existing traffic traveling to and from the school to different roadways as a result of new pick-up/drop-off zones or new driveways. Changes to site access along roadways that include pedestrian, bicycle, and transit facilities could result in safety conflicts between the different users of the roadway or affect operations of these facilities. This would conflict with the City's plans and policies addressing the circulation system, including roadway, pedestrian, bicycle, and transit facilities. This is a potentially significant impact.

### Mitigation Measures

For **Impact-TRA-2**:

Implement **MM-TRA-1** and **MM-TRA-2,** as described above.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with whole site modernization projects would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant.

#### *Operation*

**MM-TRA-1** and **MM-TRA-2** would reduce hazards to students and other users of the roadways that could result from incompatible uses. A Safe Routes to School Plan uses various measures to ensure that pedestrian and bicyclists can arrive at school safely, including educating parents and students on safe walking and biking procedures, as well as offering potential engineering solutions to make the streets safer for all modes of transportation. A pick-up/drop-off plan would establish a safe and efficient procedure for student pick-up/drop-off, which would reduce conflicts between the various

users of the roadway. These measures would reduce hazards associated with incompatible uses, and **Impact-TRA-2** would be reduced to less than significant.

## Upgrades of Existing School and Administrative Sites and Joint Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

Construction activities related to upgrades of existing school and administrative sites and joint-use development would take place entirely within their respective project sites and would not involve new geometric design features or incompatible uses. During construction activities associated with these project categories, construction equipment would be stored at the project site temporarily but would be secured when not in use so as not to pose a hazard to the surrounding community or school operations. Any construction traffic control that is required would be conducted in accordance with the District's traffic control specifications, as detailed in Section 4.13.3, above, which require compliance with the requirements of the authorities having jurisdiction over the roadways; protection of existing site improvements, including curbs, pavements, and utilities; and access to fire hydrants or other fire-fighting equipment. In addition, flagging personnel would ensure that traffic congestion or blocked roads would not occur. This would not constitute a hazard due to geometric design features or incompatible uses, and impacts would be less than significant.

#### *Operation*

Upgrades of existing schools and administrative facilities and joint-use facilities development would involve improvements within existing school and administrative sites and would not result in increased student capacity or changes to site access. No new features would be implemented, such as internal roadways, that would introduce new geometric design features such that hazardous conditions would occur. In addition, as the use of the site would not change, new incompatible uses would not be introduced. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites and joint-use development would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant.

#### *Operation*

Operational activities associated with upgrades of existing school and administrative sites and joint-use development would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant.

### Mitigation Measures

None required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites and joint-use development would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant.

#### *Operation*

Operational activities associated with upgrades of existing school and administrative sites and joint-use development would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant.

## Site-Specific Analysis

### Impact Discussion

#### Construction

Construction activities related to the 21 near-term, site-specific whole site modernization projects would take place within their respective project sites and would not involve new geometric design features or incompatible uses. During construction activities, construction equipment would be stored at the project site temporarily but would be secured when not in use so as not to pose a hazard to the surrounding community or school operations. If construction traffic control is required, flagging personnel would ensure that traffic congestion or blocked roads would not occur. However, this would not constitute a hazard due to geometric design features or incompatible uses, and impacts would be less than significant.

#### Operation

The near-term, site-specific whole site modernizations could include construction of new minor internal access driveways and new curb cuts along city streets. Any proposed curb cuts for new site access or pick-up/drop-off would need to be approved by the City of San Diego, which would ensure that proper site distances would be incorporated into the final design of the driveway to reduce potential hazards to vehicles while exiting the school site.

However, the near-term projects could result in changes to site access, which have the potential to increase pedestrian, bicycle, and vehicular traffic along the roadways adjacent to the schools. This increased traffic could occur adjacent to arterial or collector roadways that enable higher travel speeds and greater vehicular volumes, such as in areas near commercial uses. Increased student-generated pedestrian and bicycle traffic along these roadways would result in incompatible uses, such as high pedestrian/bicyclist populations or pick-up/drop-off vehicles traveling slowly and making frequent stops along arterial or collector roadways where other users are traveling at faster speeds. This combination of different modes of transportation and traveling speeds, for example, between the students and other users of the roadways could result in hazardous conditions, which would result in a significant impact (**Impact-TRA-2**).

**MM-TRA-1** and **MM-TRA-2** would be required, which would reduce hazards to students and other users of the roadways that could result from incompatible uses. A Safe Routes to School Plan uses various components to ensure that pedestrian and bicyclists can arrive to school safely, including educating parents and students on safe walking and biking procedures, as well as offering potential engineering solutions to make the streets safer for all modes of transportation. A Pick-Up/Drop-Off Plan would establish a safe and efficient procedure for student pick-up/drop-off, which would reduce conflicts between the various users of the roadway. These measures would reduce hazards associated with incompatible uses, and **Impact-TRA-2** would be reduced to less than significant.

## Level of Significance Prior to Mitigation

### Construction

Construction activities associated with near-term, site-specific whole site modernization projects would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant.

### Operation

**Impact-TRA-2: Conflict with Policies Related to Safe and Effective Pedestrian and Bicycle Routes to School and Result in Potential Safety Hazards During Operation of a Whole Site Modernization Project.** Whole site modernization projects could change site access and shift travel routes for existing traffic traveling to and from the school to different roadways as a result of new pick-up/drop-off zones or new driveways. Changes to site access along roadways that include pedestrian, bicycle, and transit facilities could result in safety conflicts between the different users of the roadway or affect operations of these facilities. This would conflict with the City of San Diego's plans and policies addressing the circulation system, including roadway, pedestrian, bicycle, and transit facilities. This is a potentially significant impact.

## Mitigation Measures

For **Impact-TRA-2**:

Implement **MM-TRA-1** and **MM-TRA-2**, as described above.

## Level of Significance After Mitigation

### Construction

Construction activities associated with near-term, site-specific whole site modernization projects would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant.

### Operation

Implementation of **MM-TRA-1** and **MM-TRA-2** would reduce hazards to students and other users of the roadways that could result from incompatible uses. A Safe Routes to School Plan uses various components to ensure that pedestrian and bicyclists can arrive to school safely, including educating

parents and students on safe walking and biking procedures, as well as offering potential engineering solutions to make the streets safer for all modes of transportation. A Pick-Up/Drop-Off Plan would establish a safe and efficient procedure for student pick-up/drop-off, which would reduce conflicts between the various users of the roadway. These measures would reduce hazards associated with incompatible uses, and **Impact-TRA-2** would be reduced to less than significant.

## *Threshold 4: Would the Proposed Program result in inadequate emergency access?*

# Program-Level Analysis

## All Project Categories

### Impact Discussion

#### *Construction*

During the construction period for all project categories, roadway users, including emergency vehicles, may experience temporary delays on roadways surrounding the school sites as a result of deliveries and the off-hauling of construction materials. However, such delays would be infrequent and brief. The potential reduction in emergency access would not result in conditions that would be substantially different from existing conditions on roadways that surround the future project sites. All construction staging would occur within the boundaries of the school sites. Impacts would be less than significant.

#### *Operation*

Generally, new school or administrative facilities and whole site modernization projects could involve changes to the internal circulation of a project site. Any such changes would be designed to provide emergency access and accommodate emergency vehicles, consistent with the City of San Diego standards for fire truck access. Fire lanes would be incorporated into site plans, and emergency access would be adequate to ensure the safety of users of the future school and administrative sites. In addition, upgrades of existing school and administrative sites and joint-use facilities development would not result in increased capacity and would not adjust site access. Therefore, there would be no changes to the existing emergency access at the various school sites. Consequently, a reduction in emergency access would not occur as a result of operations of these project categories. Impacts related to inadequate emergency access would be less than significant for all project categories under the Proposed Program.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with all project categories would not result in inadequate emergency access. Impacts would be less than significant.

#### *Operation*

Operational activities associated with all project categories would not result in inadequate emergency access. Impacts would be less than significant.

### Mitigation Measures

None required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with all project categories would not result in inadequate emergency access. Impacts would be less than significant.

#### *Operation*

Operational activities associated with all project categories would not result in inadequate emergency access. Impacts would be less than significant.

## Site-Specific Analysis

### Impact Discussion

#### Construction

During the construction period for the near-term, site-specific whole site modernization projects, roadway users, including emergency vehicles, may experience temporary delays on roadways surrounding the school sites as a result of deliveries and the off-hauling of construction materials. However, such delays would be infrequent and brief, and the potential reduction in emergency access would not result in conditions that would be substantially different from existing conditions on roadways that surround the project sites. All construction staging would occur within the boundaries of the school sites. Impacts would be less than significant.

#### Operation

The near-term, site-specific whole site modernization projects could involve changes to the internal circulation of a project site. Any such changes would be designed to provide emergency access and accommodate emergency vehicles, consistent with the City of San Diego standards for fire truck access. Fire lanes would be incorporated into site plans and emergency access would be adequate to ensure the safety of users of the school sites. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### Construction

Construction activities associated with near-term, site-specific whole site modernization projects would not result in inadequate emergency access. Impacts would be less than significant.

### Operation

Operational activities associated with near-term, site-specific whole site modernization projects would not result in inadequate emergency access. Impacts would be less than significant.

## Mitigation Measures

None required.

## Level of Significance After Mitigation

### Construction

Construction activities associated with near-term, site-specific whole site modernization projects would not result in inadequate emergency access. Impacts would be less than significant.

### Operation

Operational activities associated with near-term, site-specific whole site modernization projects would not result in inadequate emergency access. Impacts would be less than significant.

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# Section 4.14
# Tribal Cultural Resources

## 4.14.1 Overview

This section describes the existing conditions and applicable laws and regulations for tribal cultural resources, followed by an analysis of the Proposed Program's potential to cause a substantial adverse change in the significance of a tribal cultural resource.

Recent legislation (Assembly Bill [AB] 52) amended CEQA to add another category of cultural resource: tribal cultural resources. Tribal cultural resources are defined as "sites, features, places, and objects with cultural value to descendant communities or cultural landscapes; and sacred places including, but not limited to, Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines." These resources must be listed in the Native American Heritage Commission's (NAHC's) Sacred Lands File, included in or eligible for the California Register of Historical Resources (CRHR), included in a local register of historical resources, or be determined significant by the CEQA lead agency.

Table 4.14-1 summarizes the significant impacts and mitigation measures (MMs) discussed in Section 4.14.4.3, *Impacts and Mitigation Measures*.

**Table 4.14-1. Summary of Significant Tribal Cultural Resources Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact-TRI-1**: Disturbance and/or Destruction of Previously Identified Tribal Cultural Resources: | **MM-TRI-1:** Conduct Monitoring of Ground-Disturbing Activities by Native American Monitors | Less than Significant | The recommended file search and monitoring of any ground-disturbing activities would minimize potential damage or loss of tribal cultural resources. |
| **Impact-TRI-2**: Disturbance and/or Destruction of Undiscovered Tribal Cultural Resources | **MM-TRI-2:** Obtain a Sacred Lands File Search and Consult with Jamul Indian Village if Positive Results Are Identified | Less than Significant | The recommended file search and monitoring of any ground-disturbing activities would minimize potential damage or loss of tribal cultural resources. |
| **Whole Site Modernization** | | | |
| **Impact-TRI-1**: Disturbance and/or Destruction of Previously Identified Tribal Cultural Resources: | **MM-TRI-1:** Conduct Monitoring of Ground-Disturbing Activities | Less than Significant | The recommended file search and monitoring of any ground-disturbing activities would minimize potential damage or loss |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | by Native American Monitors | | of tribal cultural resources. |
| **Impact-TRI-2**: Disturbance and/or Destruction of Undiscovered Tribal Cultural Resources | **MM-TRI-2:** Obtain a Sacred Lands File Search and Consult with Jamul Indian Village if Positive Results Are Identified | Less than Significant | The recommended file search and monitoring of any ground-disturbing activities would minimize potential damage or loss of tribal cultural resources. |
| **Upgrades of Existing School and Administrative Sites** | | | |
| **Impact-TRI-3:** Disturbance and/or Destruction of Previously Identified Tribal Cultural Resources | **MM-TRI-3:** Conduct Monitoring of Ground-Disturbing Activities by Native American Monitors | Less than Significant | The recommended monitoring of any ground-disturbing activities would minimize potential damage or loss of tribal cultural resources. |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| **Impact-TRI-3:** Disturbance and/or Destruction of Previously Identified Tribal Cultural Resources. | **MM-TRI-3:** Conduct Monitoring of Ground-Disturbing Activities by Native American Monitors | Less than Significant | The recommended monitoring of any ground-disturbing activities would minimize potential damage or loss of tribal cultural resources. |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| **Impact-TRI-3:** Disturbance and/or Destruction of Previously Identified Tribal Cultural Resources. | **MM-TRI-3:** Conduct Monitoring of Ground-Disturbing Activities by Native American Monitors | Less than Significant | The recommended monitoring of any ground-disturbing activities would minimize potential damage or loss of tribal cultural resources. |

## 4.14.2 Existing Conditions

Pursuant to Public Resources Code (PRC) Section 21080.3.1 (AB 52), California Native American tribes traditionally and culturally affiliated with a project area can request notification of projects in their traditional cultural territory. Since enactment of AB 52, the Jamul Indian Village contacted the District and requested to be a consulting tribe on all District projects; it is now a consulting tribe under AB 52. The District and the Jamul Indian Village meet periodically to review upcoming District projects and discuss tribal concerns. As a result of one of these meetings, the Jamul Indian Village provided the District with the following list of school sites where they requested Native American monitors be present during ground disturbing activities:

- Holly Drive Leadership
- Iftin K-8
- Ingenuity Charter (co-located on the O'Farrell Community Charter School campus)
- Kavod Elementary
- National University Academy
- The Learning Choice Academy
- Fay Elementary
- Franklin Elementary
- Taft Middle – Francis Parker Side
- Chavez Elementary
- Hage Elementary
- Mission Bay High
- Barnard Asian Pacific Language Academy
- Crown Point Junior Music Academy
- Sessions Elementary
- Rodriguez Elementary
- Miramar Ranch Elementary
- Scripps Ranch High
- University City High

On August 7, 2019, an invitation to consult on the Proposed Program was extended to the Jamul Indian Village. No response was received and a follow-up letter was sent to the Jamul Indian Village on January 24, 2020, and a follow-up meeting occurred on February 20, 2020. Based on the AB 52 consultation process, the District determined that significant tribal cultural resources are potentially present within the Program area. The locations of these resources are confidential and therefore not disclosed in this PEIR.

In addition, as discussed in Chapter 2, *Project Description*, the District has identified near-term, site-specific Whole Site Modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 3-2.

A Sacred Lands File Search was requested from the Native American Heritage Commission for each of the 21 school sites. Eight schools were identified as having sacred lands either on the school property or within the vicinity. The exact location of these sacred lands is confidential. These eight schools were identified in the follow-up letter sent to the Jamul Indian Village on January 24, 2020, and a follow-up meeting was held on February 20, 2020. Jamul Indian Village requested Native American monitoring at the following eight schools:

- Crown Point Junior Music Academy
- Correia Middle School

- Clairemont High School
- Madison High School
- Pacific Beach Elementary School
- Perkins K-8 School
- Roosevelt Middle School
- Barnard Asian Pacific Language Academy

# 4.14.3 Applicable Laws and Regulations

## 4.14.3.1 Federal

### National Historic Preservation Act Section 106

Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR 800, as amended in 1999) require that federal agencies and entities that they fund or license consider the effects of their actions on properties that are listed in the National Register of Historic Places (NRHP), or that may be eligible for such listing. To determine whether an undertaking could affect NRHP-eligible properties, cultural resources, including historical and architectural properties, must be inventoried and evaluated. Although compliance with Section 106 is the responsibility of the lead federal agency, others can conduct the work necessary to comply.

The Section 106 review process consists of four steps.

1. Initiate the Section 106 process by establishing the undertaking, developing a plan for public involvement, and identifying other consulting parties.
2. Identify *historic properties* (resources that are eligible for inclusion in the NRHP) by determining the scope of efforts, identifying cultural resources in the area potentially affected by the project, and evaluating resources' eligibility for NRHP inclusion.
3. Assess adverse effects by applying the Section 106 criteria of adverse effect to identified historic properties.
4. Resolve adverse effects by consulting with the State Historic Preservation Officer (SHPO) and other consulting agencies, including the Advisory Council on Historic Preservation if necessary, to develop an agreement that addresses the treatment of historic properties.

### National Register of Historic Places

The NRHP is the nation's master inventory of known historic properties. It is administered by the National Park Service in conjunction with the SHPO. The NRHP includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. Resources of tribal significance, termed traditional cultural properties, may also be listed on the NRHP. The NRHP criteria and associated definitions are outlined in National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation* (U.S. Department of the Interior, National Park Service 1988). The following is a summary of Bulletin 15.

Resources (structures, sites, buildings, districts, and objects) more than 50 years of age can be listed in the NRHP provided they meet the evaluative criteria described below. However, properties less than 50 years of age that are of exceptional importance or are contributors to a district, and that also meet the evaluative criteria, can be included in the NRHP as well.

The NRHP includes four criteria under which a structure, site, building, district, or object can be considered sufficiently significant for listing on the NRHP.

A. Resources associated with events that have made a significant contribution to the broad patterns of history.

B. Resources associated with the lives of persons significant in our past.

C. Resources that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

D. Resources that have yielded or may likely yield information important in prehistory or history.

Resources can be listed individually in the NRHP or as contributors to a historic district.

When nominating a resource to the NRHP, one must evaluate and clearly state the significance of that resource to American history, architecture, archaeology, engineering, or culture. A resource can be individually significant if it meets any of the above-stated criteria; only one criterion needs to be met for the eligibility of the resource to be considered.

A resource may be considered eligible for listing on the NRHP if it meets one or more of the above-stated criteria for significance and possesses integrity. Historic properties must retain their integrity to convey their significance. Although the evaluation of integrity is sometimes a subjective judgment, it must always be grounded in an understanding of the resource's physical features and how they relate to its significance. The NRHP recognizes seven aspects or qualities that define integrity: location, design, setting, materials, workmanship, feeling, and association.

To retain historic integrity, a resource should possess several of the above-stated aspects. The retention of specific aspects of integrity is essential for a resource to convey its significance. When the integrity of a resource is being evaluated, the resource should also be considered in comparison to similar properties; such comparison may be important for determining physical features that are essential to reflect the significance of a historic context.

## 4.14.3.2 State

### California Environmental Quality Act and Public Resources Code Section 5024.1 (California Register of Historical Resources)

CEQA requires public agencies to evaluate the implications of their projects on the environment and includes significant historical resources as part of the environment. According to CEQA, a project that causes a substantial adverse change in the significance of a historical resource or a unique archaeological resource has a significant effect on the environment (State CEQA Guidelines 15064.5, PRC Section 21083.2).

CEQA defines a *substantial adverse change* as follows.

- Physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.
- Demolition or material alteration of the physical characteristics that convey the resource's historical significance and justify its designation as a historical resource.

Public agencies must treat any cultural resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant (14 California Code of Regulations 15064.5). A historical resource is considered significant if it meets the definition of historical resource or unique archaeological resource.

The term *historical resource* includes but is not limited to any object, building, structure, site, area, place, record, or manuscript that is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California (PRC Section 5020.1(j)). Historical resources may be designated as such through three different processes.

1. Official designation or recognition by a local government pursuant to local ordinance or resolution (PRC Section 5020.1(k))
2. A local survey conducted pursuant to PRC Section 5024.1(g)
3. Listing in or eligibility for listing in the NRHP (PRC Section 5024.1(d)(1))

The CRHR is very similar to the NRHP program. The CRHR was enacted in 1992, and its regulations became official January 1, 1998. The CRHR is administered by the Office of Historic Preservation and was established to serve as an authoritative guide to the state's significant historical and archaeological resources (PRC Section 5024.1). State law provides that in order for a property to be considered eligible for listing in the CRHR, it must be significant under any of the following four criteria, which parallel NRHP criteria.

1. The property is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. The property is associated with the lives of persons important in our past.
3. The property embodies the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master or possesses high artistic values.
4. The property has yielded, or may be likely to yield, information important in prehistory or history.

To be considered a historical resource for the purposes of CEQA, the resource must also have *integrity*, which is the authenticity of a resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance.

Resources, therefore, must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is eligible for listing in the CRHR (14 California Code of Regulations 4852(c)).

Resources listed in the NRHP are automatically included in the CRHR.

## Assembly Bill 52 (Chapter 532, Statutes of 2014)

AB 52 (Chapter 532, Statutes of 2014) establishes a formal consultation process for California Native American tribes as part of CEQA and equates significant impacts on tribal cultural resources with significant environmental impacts (PRC Section 21084.2). PRC Section 21074 defines tribal cultural resources as follows.

- Sites, features, places, sacred places, and objects with cultural value to descendant communities or cultural landscapes defined in size and scope that are:
    - Included in or eligible for listing in the CRHR; or
    - Included in a local register of historical resources.
- 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.

Sacred places can include Native American sanctified cemeteries, places of worship, religious or ceremonial sites, and sacred shrines. In addition, both unique and non-unique archaeological resources, as defined in PRC Section 21083.2, can be tribal cultural resources if they meet the criteria detailed above. The lead agency relies upon substantial evidence to make the determination that a resource qualifies as a tribal cultural resource when it is not already listed in the CRHR or a local register.

AB 52 defines a California Native American Tribe as a Native American tribe in California that is on the contact list maintained by NAHC (PRC Section 21073). Under AB 52, formal consultation with tribes is required prior to determining the level of environmental document if a tribe has requested to be informed by the lead agency of proposed projects and if the tribe, upon receiving notice of the project, accepts the opportunity to consult within 30 days of receipt of the notice. AB 52 also requires that consultation, if initiated, address project alternatives and mitigation measures for significant effects, if specifically requested by the tribe. AB 52 states that consultation is considered concluded when either the parties agree to measures to mitigate or avoid a significant effect on tribal cultural resources, or when either the tribe or the agency concludes that mutual agreement cannot be reached after making a reasonable, good-faith effort. Under AB 52, any mitigation measures recommended by the agency or agreed upon with the tribe may be included in the final environmental document and in the adopted mitigation monitoring program if they were determined to avoid or lessen a significant impact on a tribal cultural resource. If the recommended measures are not included in the final environmental document, then the lead agency must consider the four mitigation methods described in PRC Section 21084.3(e). Any information submitted by a tribe during the consultation process is considered confidential and is not subject to public review or disclosure. It will be published in a confidential appendix to the environmental document unless the tribe consents to disclosure of all or some of the information to the public.

## Health and Safety Code 7050.5/Public Resources Code 5097.9

Health and Safety Code 7050.5 addresses the protection of human remains discovered in any location other than a dedicated cemetery and makes it a misdemeanor for any person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law, except as provided in PRC Section 5097.99. It further states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or

disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in PRC Section 5097.98. If the coroner determines that the remains are not subject to his or her authority and recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, NAHC. Whenever NAHC receives notification of a discovery of Native American human remains from the county coroner, it shall immediately notify those people it believes to be the most likely descendants of the deceased Native American. The descendants may inspect the site of the discovery and make recommendations on the removal or reburial of the remains.

#### California Government Code Section 6254 (r) and 6254.10

California Government Code Sections 6254(r) and Section 6254.10 of the California Public Records Act were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to "Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission." Section 6254.10 specifically exempts from disclosure requests for "records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a state or local agency."

### 4.14.3.3 Local

In January 2000, the City's Historical Resources Regulations, part of the City of San Diego Municipal Code (Chapter 14, Article 3, Division 2: Purpose of Historical Resources Regulations or Sections 143.0201-143.0280), were adopted to implement applicable local, state, and federal policies and mandates. However, California Government Code Section 53094 includes provisions for school districts to exempt specific school facilities from local zoning regulations. Therefore, the Proposed Program is not subject to the City's Historical Resources Regulations.

## 4.14.4 Impact Analysis

### 4.14.4.1 Methodology

The impact analysis focuses on determining potential impacts to tribal cultural resources that were identified as part of AB 52 consultation and based on the results of the Sacred Lands File Search. The type of activities associated with the Proposed Program that have the potential to impact the identified tribal cultural resources are ground disturbing activities. Impacts to other cultural resources, including those identified during due diligence outreach with tribal representatives, are discussed in Section 4.4*, Cultural Resources*.

## 4.14.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining the significance of impacts associated with tribal cultural resources resulting from implementation of the Proposed Program. The determination of whether a tribal cultural resources impact would be significant is based on the thresholds described below and the professional judgement of the District as Lead Agency and the recommendations of qualified personnel at ICF, all of which is based on the evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following.

1. A substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

    a. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC section 5020.1(k), or

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

# 4.14.4.3 Impacts and Mitigation Measures

***Threshold 1a: Would the Proposed Program 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 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)?***

***Threshold 1b: Would the Proposed Program cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a 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?***

## Program-Level Analysis

### All Project Categories

#### Impact Discussion

##### *Construction*

Based on the AB 52 consultation process, the District determined that significant tribal cultural resources are potentially present within portions of the Program area, though the specific location is confidential. These resources are not currently listed on the CRHR or a local register of historical resources; however, they could be eligible. Other existing school sites and new acquisition sites within the Program area could also include tribal cultural resources, the location of which is currently unknown.

Demolition and construction of new structures associated with each of these categories could include varying depths of excavation and ground disturbance. If ground-disturbing activities were to occur in areas identified as sensitive by Jamul Indian Village, these activities could damage or destroy tribal cultural resources, which would be a significant impact (**Impact-TRI-1**).

In addition, ground-disturbing activities associated with construction activities of all project categories could damage or destroy currently undiscovered tribal cultural resources, which would also be a significant impact (**Impact-TRI-2**).

After implementation of **MM-TRI-1** and **MM-TRI-2**, **Impact-TRI-1** and **Impact-TRI-2** would be reduced to less-than-significant levels because the recommended file search and monitoring of any ground-disturbing activities would minimize potential damage or loss of tribal cultural resources.

### Operation

Operations of District facilities subject to the Proposed Program would not involve ground disturbance and therefore would not demolish or physically alter a tribal cultural resource. No impact on a tribal cultural resource would occur.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-TRI-1**: **Disturbance and/or Destruction of Previously Identified Tribal Cultural Resources.** Ground-disturbing activities associated with implementation of the Proposed Program could result in damage or destruction of tribal cultural resources at the following school sites identified as locations of tribal cultural resources concern and would constitute a significant impact on a tribal cultural resource. This is a potentially significant impact.

- Clairemont High
- Correia Middle
- Holly Drive Leadership
- Iftin K-8
- Ingenuity Charter (co-located on the O'Farrell Community Charter School campus)
- Kavod Elementary
- Madison High
- Fay Elementary
- Franklin Elementary
- Taft Middle – Francis Parker Side
- Chavez Elementary
- Hage Elementary
- Mission Bay High
- Barnard Asian Pacific Language Academy
- Crown Point Junior Music Academy
- Sessions Elementary
- Rodriguez Elementary
- Miramar Ranch Elementary
- Scripps Ranch High
- University City High
- Perkins K-8
- Pacific Beach Elementary

- Roosevelt Middle

**Impact-TRI-2 Disturbance and/or Destruction of Undiscovered Tribal Cultural Resources.** Ground-disturbing activities associated with the Proposed Program could result in damage or destruction of undiscovered tribal cultural resources, which would constitute a significant impact on a tribal cultural resource. This is a potentially significant impact.

### Operation

Operation of the Proposed Program would not cause a substantial adverse change in the significance of a tribal cultural resource. No impacts would occur.

### Mitigation Measures

For **Impact-TRI-1:**

**MM-TRI-1: Conduct Monitoring of Ground-Disturbing Activities by Native American Monitors**. To reduce potential impacts on tribal cultural resources, prior to construction, the District shall consult with the Jamul Indian Village to determine if Native American monitors shall be present during ground-disturbing activities at the following school sites:

- Clairemont High
- Correia Middle
- Holly Drive Leadership
- Iftin K-8
- Ingenuity Charter (co-located on the O'Farrell Community Charter School campus)
- Kavod Elementary
- Madison High
- Fay Elementary
- Franklin Elementary
- Taft Middle – Francis Parker Side
- Chavez Elementary
- Hage Elementary
- Mission Bay High
- Barnard Asian Pacific Language Academy
- Crown Point Junior Music Academy
- Sessions Elementary
- Rodriguez Elementary
- Miramar Ranch Elementary
- Scripps Ranch High
- University City High

- Perkins K-8
- Pacific Beach Elementary
- Roosevelt Middle

If it is determined that monitoring is necessary at any of the schools identified as being sensitive, the monitoring shall be conducted by a qualified Kumeyaay Native American monitor during ground-disturbing activities. The role of the Kumeyaay Native American monitor would be to represent tribal concerns and communicate with the tribal council. Appropriate representatives would be identified based on the location of the identified traditional location or place. Specifically, the following measures shall be implemented to reduce impacts:

- The Native American consultant/monitor, in consultation with the District, shall determine the extent of their presence during soil-disturbing and grading/excavation/trenching activities, and assist the District's qualified archaeologist and District with preparing the monitoring plan.
- If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop until the Native American monitor can observe and comment on the nature of the find.
- Attendance by Native American monitors during construction and restoration of the Proposed Program is at the discretion of the tribe, and the absence of a Native American monitor, should the tribes choose to forgo monitoring for some reason, will not delay work.
- The Native American monitors shall have the ability to notify the District's qualified archaeological monitor who has the authority to temporarily stop work if they find a cultural resource that may require recordation and evaluation.
- Interpretation of a find shall be requested from the Native American consultant/monitors involved with the discovery, evaluation, or data recovery of unanticipated finds for inclusion in a final Cultural Resources Report.
- The Native American monitor, in consultation with the District's qualified archaeologist, shall have the discretion to increase or decrease the level of monitoring under certain field conditions such as modern disturbance, including previous excavation/grading/trenching activities that exceed the depth of, or have removed, potential archaeological deposits; or when native soils are encountered.

For **Impact TRI-2**:

**MM-TRI-2: Obtain a Sacred Lands File Search and Consult with Jamul Indian Village if Positive Results Are Identified**. To reduce potential impacts on tribal cultural resources, a Sacred Lands file search of the project site shall be obtained from the NAHC. If the file search is positive, the District shall implement **MM-TRI-1.** If the file search is negative, and the project location has not been identified an as area of tribal cultural resources concern, no further action is required.

### Level of Significance After Mitigation

***Construction***

After implementation of **MM-TRI-1** and **MM-TRI-2**, **Impact-TRI-1** and **Impact-TRI-2** would be reduced to less-than-significant levels because the recommended file search and monitoring of any ground-disturbing activities would minimize potential damage or loss of tribal cultural resources.

***Operation***

Operation of the Proposed Program would not cause a substantial adverse change in the significance of a tribal cultural resource. No impacts would occur.

## Site-Specific Analysis

### Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.14-2. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the whole site modernization project category.

**Table 4.14-2. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 School | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 School | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019.

### Construction

As described above under *Program-Level Analysis*, based on the Sacred Land Files Search completed for the 21 school sites and the AB 52 consultation process, the District determined that significant tribal cultural resources are potentially present within portions of the Program area, though the specific location is confidential.

Demolition and construction of new structures associated with site-specific projects could include varying depths of excavation and ground disturbance. Similar to the Proposed Program, the Jamul Indian Village requested Native American monitors be present during ground disturbing activities at the following schools:

- Clairemont High
- Correia Middle
- Madison High
- Barnard Asian Pacific Language Academy
- Crown Point Junior Music Academy
- Perkins K-8
- Pacific Beach Elementary
- Roosevelt Middle

If ground-disturbing activities were to occur at the project-specific sites identified as sensitive by Jamul Indian Village, these activities could damage or destroy tribal cultural resources, which would be a significant impact (**Impact-TRI-3**).

### Operation

Operations of the near-term, site-specific whole site modernization projects would not involve ground disturbance and therefore would not demolish or physically alter a tribal cultural resource. No impact on a tribal cultural resource would occur.

## Level of Significance Prior to Mitigation

### Construction

**Impact-TRI-3: Disturbance and/or Destruction of Previously Identified Tribal Cultural Resources.** Ground-disturbing activities associated with implementation of the site-specific projects could result in damage or destruction of tribal cultural resources at the following school sites identified as locations of tribal cultural resources concern and would constitute a significant impact on a tribal cultural resource. This is a potentially significant impact.

- Clairemont High
- Correia Middle
- Madison High
- Barnard Asian Pacific Language Academy
- Crown Point Junior Music Academy

- Perkins K-8
- Pacific Beach Elementary
- Roosevelt Middle

### Operation

Operation of the near-term, site-specific whole site modernization projects would not cause a substantial adverse change in the significance of a tribal cultural resource. No impacts would occur.

## Mitigation Measures

For **Impact-TRI-3:**

**MM-TRI-3: Conduct Monitoring of Ground-Disturbing Activities by Native American Monitors**. To reduce potential impacts on tribal cultural resources, prior to construction, the District shall consult with the Jamul Indian Village to determine if Native American monitors shall be present during ground disturbing activities at the following school sites:

- Clairemont High
- Correia Middle
- Madison High
- Barnard Asian Pacific Language Academy
- Crown Point Junior Music Academy
- Perkins K-8
- Pacific Beach Elementary
- Roosevelt Middle

If it is determined that monitoring is necessary at any of the schools identified as being sensitive, the monitoring shall be conducted by a qualified Kumeyaay Native American monitor during ground-disturbing activities. The role of the Kumeyaay Native American monitor would be to represent tribal concerns and communicate with the tribal council. Appropriate representatives would be identified based on the location of the identified traditional location or place. Specifically, the following measures shall be implemented to reduce impacts:

- The Native American consultant/monitor, in consultation with the District, shall determine the extent of their presence during soil-disturbing and grading/excavation/trenching activities, and assist the District's qualified archaeologist and District with preparing the monitoring plan.
- If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop until the Native American monitor can observe and comment on the nature of the find.
- Attendance by Native American monitors during construction and restoration of the Proposed Program is at the discretion of the tribe, and the absence of a Native American monitor, should the tribes choose to forgo monitoring for some reason, will not delay work.

- The Native American monitors shall have the ability to notify the District's qualified archaeological monitor who has the authority to temporarily stop work if they find a cultural resource that may require recordation and evaluation.
- Interpretation of a find shall be requested from the Native American consultant/monitors involved with the discovery, evaluation, or data recovery of unanticipated finds for inclusion in a final Cultural Resources Report.
- The Native American monitor, in consultation with the District's qualified archaeologist, shall have the discretion to increase or decrease the level of monitoring under certain field conditions such as modern disturbance, including previous excavation/grading/trenching activities that exceed the depth of, or have removed, potential archaeological deposits; or when native soils are encountered.

## Level of Significance After Mitigation

### Construction

After implementation of **MM-TRI-3**, **Impact-TRI-3** would be reduced to a less-than-significant level because the recommended monitoring of any ground-disturbing activities would minimize potential damage or loss of tribal cultural resources.

### Operation

Operation of the near-term, site-specific whole site modernization projects would not cause a substantial adverse change in the significance of a tribal cultural resource. No impacts would occur.

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Section 4.15
# Utilities and Service Systems

## 4.15.1 Overview

This section describes the existing utility and service systems that serve the Program area as well as the applicable laws and regulations that govern their use, supply and distribution, and performance. This section also discusses the Proposed Program's potential to (1) require or result in the relocation or construction of new or expanded water, or wastewater treatment or stormwater drainage, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; (2) have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years; (3) result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the Proposed Program's projected demand in addition to the provider's existing commitments; (4) 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; or (5) comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

Table 4.15-1 summarizes the significant impacts and mitigation measures (MMs) discussed in Section 4.15.4.3, *Project Impacts and Mitigation*.

**Table 4.15-1. Summary of Significant Utilities and Service Systems Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities; Whole Site Modernization; Upgrades of Existing School and Administrative Sites; Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| No significant impacts were identified. | None required | Less than Significant | N/A |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| No significant impacts were identified. | None required | Less than Significant | N/A |

## 4.15.2 Existing Conditions

The utility providers that service the District are listed in Table 4.15-2. Each service and utility is described in further detail below.

**Table 4.15-2. Utility Service Providers**

| Utility Service | Provider |
|---|---|
| Water Supply | City of San Diego Public Utilities Department (Water Branch) |
| Wastewater | City of San Diego Public Utilities Department (Wastewater Branch) |
| Stormwater | City of San Diego Storm Water Division |
| Solid Waste | City of San Diego Environmental Services Department |
| Electricity and Natural Gas[1] | San Diego Gas and Electric (SDG&E) |
| Telecommunications | Various privately owned providers |

[1] Electricity and natural gas usage is discussed and analyzed in Section 4.5, *Energy*, of this PEIR.

### 4.15.2.1 Water Supply

Water service is currently provided to District facilities by the City of San Diego Public Utilities Department's (PUD) Water Branch, which is a member agency of the San Diego County Water Authority, the wholesale water provider for the San Diego Region. The City of San Diego's water system is maintained and operated by the PUD and provides water service to a population of approximately 1.38 million people. The City of San Diego's service area covers 404 square miles with average water deliveries of 200 million gallons per day (mgd), or 224,000 acre-feet per year (AFY) (PUD 2016). The City of San Diego's water system is made up of nine reservoirs that capture runoff from rainfall within local water sheds covering more than 900 square miles. In addition, the PUD maintains and operates three water treatment plants, more than 3,302 miles of water lines, 49 water pump plants, 90-plus pressure zones, and more than 200 mgd of potable water storage capacity in 32 standpipes, elevated tanks, and concrete and steel reservoirs (PUD 2016). The City of San Diego's nine reservoirs have a combined capacity of 569,021 acre-feet. The City relies heavily on imported water purchased from the County Water Authority, which makes up approximately 80 to 90% of the City's water sources. This purchased water is predominantly imported from the Colorado River and Northern California (through the State Water Project) (PUD 2019).

Pursuant to the Urban Water Management Planning Act (Water Code Section 10610 – 10610.4), future water demand and supply projections are required to be updated every 5 years with the adoption of an Urban Water Management Plan (UWMP). The 2015 UWMP was presented and adopted at a public hearing of the City Council on June 20, 2016. In the 2015 UWMP, water demand projections are reduced compared to the projections anticipated in the 2010 UWMP due largely to the City's ongoing implementation of conservation measures. For example, the 2015 UWMP projects that normal year demand for 2035 will be 273,748 AFY as opposed to the 298,860 AFY projected in the 2010 UWMP (PUD 2016). Estimated demand for 2040 would generally remain the same as 2035.

The City's 2015 UWMP projects the estimated demand of potable water resources until the year 2040 based on coordination with various agencies, including the San Diego County Water Authority, which provided imported water availability and regional water demands and conservation, and the San Diego Association of Governments (SANDAG), which provided the most recent demographic projections for the City (i.e., the 2050 Regional Growth Forecast Update Series 13). Table 4.15-3 shows the City's existing and projected water demand and estimated supply between 2015 and 2040 under normal weather conditions. As shown, it is anticipated that future demand would be met by the projected supply in each 5-year increment through 2040. The projected supply and demand of potable water resources is reevaluated in each 5-year update of the UWMP for the reasonably foreseeable future (i.e., 20-year planning period).

**Table 4.15-3. Normal, Single-, and Multiple-Dry Year Water Supply and Demand (2020–2040) (AFY)**

| | 2020 | 2025 | 2030 | 2035 | 2040 |
|---|---|---|---|---|---|
| **Normal Year** | | | | | |
| Supply | 200,984 | 242,038 | 264,748 | 273,748 | 273,408 |
| Demand | 200,984 | 242,038 | 264,748 | 273,748 | 273,408 |
| Difference | 0 | 0 | 0 | 0 | 0 |
| **Single-Year Dry** | | | | | |
| Supply | 213,161 | 256,883 | 281,167 | 290,654 | 290,292 |
| Demand | 213,161 | 256,883 | 281,167 | 290,654 | 290,292 |
| Difference | 0 | 0 | 0 | 0 | 0 |
| **Multiple-Year Dry (First Year)** | | | | | |
| Supply | 213,161 | 256,883 | 281,167 | 290,654 | 290,292 |
| Demand | 213,161 | 256,883 | 281,167 | 290,654 | 290,292 |
| Difference | 0 | 0 | 0 | 0 | 0 |
| **Multiple-Year Dry (Second Year)** | | | | | |
| Supply | 200,610 | 241,581 | 264,338 | 273,228 | 272,888 |
| Demand | 200,610 | 241,581 | 264,338 | 273,228 | 272,888 |
| Difference | 0 | 0 | 0 | 0 | 0 |
| **Multiple-Year Dry (Third Year)** | | | | | |
| Supply | 208,665 | 251,402 | 275,139 | 284,412 | 284,058 |
| Demand | 208,665 | 251,402 | 275,139 | 284,412 | 284,058 |
| Difference | 0 | 0 | 0 | 0 | 0 |

Source: PUD 2016, Tables 6-1 and 6-16.

Current water use at the District's educational and administrative facilities is accounted for in the City's 2015 UWMP. Existing daily water use at the District's facilities is approximately 819,324[1] gallons per day (gpd), or approximately 299,053,236 gallons per year, serving a 450-square-mile area with a service area population of over 2.2 million. The City of San Diego has a separate recycled water system that currently extends over 90 miles, and two water reclamation plants currently provide recycled water to meet non-potable water demands (PUD 2016).

## 4.15.2.2 Wastewater

Representatives of the 12 cities and agencies within the City's wastewater service area make up the Metropolitan Wastewater Joint Powers Authority (JPA), which serves as an advisory body to the City Council on the operation of the Metropolitan Sewerage System. Collectively, the wastewater collection and treatment system is known as the Metro System. Planned improvements will increase wastewater treatment capacity to serve an estimated population of 2.9 million through the year 2050. Nearly 340 mgd of wastewater will be generated by that year (Metro Wastewater Joint Powers Authority 2019).

[1] This total is an average that includes weekends and holidays. Daily water use would be higher than this average on days when school is in session.

Three treatment plants treat wastewater generated in the Metro System: the North City Water Reclamation Plant (NCWRP), the South Bay Water Reclamation Plant (SBWRP), and the Point Loma Wastewater Treatment Plant (PLWTP). The total measured wastewater collected from the wastewater service area in 2015 (the most recent year published data is available) was 190,313 acre-feet, while the total volume treated at these three facilities in 2015 was 179,620 acre-feet (PUD 2016). The NCWRP and PLWTP currently treat the wastewater generated by the District's facilities. The NCWRP treats wastewater generated by the District's facilities in the Mira Mesa, Rancho Penasquitos, Scripps Ranch, and Rancho Bernardo communities; while the remainder of wastewater generated by the District's facilities is treated at the PLWTP.

The NCWRP has a tertiary treatment capacity of 27,000 AFY (24 mgd), out of a total treatment capacity of 34,000 AFY (30 mgd). In 2015, the NCWRP collected an average daily wastewater inflow of 16.15 mgd and treated 15.22 mgd to a secondary treatment level, which is 56% of its 30 mgd capacity. In 2015, the measured wastewater flows treated were 18,094 AF, with 8,109 AF of secondary treated wastewater discharged to the sewer system and 8,946 AF recycled to a tertiary level. Secondary treated water that is not recycled is discharged to the sewer system, where it is mixed with untreated flows and conveyed to the PLWTP for treatment and discharge. Solids are conveyed to the City's Metropolitan Biosolids Center for further treatment. Approximately 90% of the recycled water produced in 2015, or 7,251 AF, was used within the water service area. The remainder of the recycled water was sold to other water supply agencies.

The PLWTP has a capacity of 240 mgd and a peak wet weather capacity of 432 mgd. In 2015, the measured wastewater collected was 136.2 mgd, which leaves an available capacity of approximately 104 mgd if this trend continues (PUD 2016). Wastewater at the PLWTP is treated to an advanced primary level, at which point it is discharged into the Pacific Ocean through a 4.5-mile-long ocean outfall. The quality of wastewater discharge from the PLWTP is regulated by National Pollutant Discharge Elimination System (NPDES) Permit No. CA0107409.

Sewer infrastructure currently serving the District's facilities includes a network of underground collector pipes, trunk lines, and force mains that convey wastewater to pump stations located throughout the PUD's Wastewater Branch service area. All offsite sewer infrastructure is operated and maintained by the City of San Diego. There are no onsite septic systems at any District facility.

### 4.15.2.3 Stormwater

Stormwater is conveyed from the District's facilities through various onsite storm drain facilities prior to being discharged to the City of San Diego's storm drain system. As discussed in Section 4.9, *Hydrology and Water Quality*, the storm drain system within the City of San Diego includes a vast network of underground pipes and open channels that take water away from streets and other developed areas. A map of the City's storm drain network is included in Appendix III of the City's Jurisdictional Runoff Management Plan (JRMP) and displays the City's current storm drain system data, which includes known pipes, channels, inlets, outlets, and other types of storm drain system conveyances and structures (City of San Diego 2019a). The City's geographic information system (GIS) storm drain system data includes both the City's storm drain infrastructure and known storm drain infrastructure belonging to other agencies or private parties that connects into the City's storm drain system.

Existing District facilities are generally located in developed areas and utilize existing stormwater drainage facilities. The District currently implements stormwater management best management practices (BMPs) at all school sites.

### 4.15.2.4 Solid Waste

Solid waste generated at the District's facilities is collected by the City of San Diego's franchised waste haulers and transported to a local landfill. The waste hauler must be City-approved per San Diego Municipal Code Section 66.0101. City-approved waste haulers are allowed to dispose of municipal solid waste at any of the landfills in San Diego County. Franchised waste haulers that provide waste removal on behalf of the City include such companies as EDCO, Waste Management, Daily Disposal Services, and Express Waste and Recycling (City of San Diego 2015).

San Diego County has four active landfills that accept solid waste: Miramar, Sycamore Canyon, Otay Annex, and Borrego Springs landfills. Table 4.15-4 shows the landfills' permitted remaining capacities and estimated remaining site lives. Remaining landfill capacities are based on design limits specific to each landfill site. Site capacity and the maximum daily permitted rate of disposal specific to each site determine the estimated closure dates.

**Table 4.15-4. Active San Diego County Municipal Solid Waste Landfills**

| Solid Waste Facility | Permitted Remaining Capacity (cubic yards) | Estimate of Remaining Site Life |
|---|---|---|
| Miramar Landfill | 15,527,878 | 2025 |
| Sycamore Canyon Landfill | 113,972,637 | 2042 |
| Otay Annex Landfill | 21,194,008 | 2030 |
| Borrego Springs Landfill | 111,504 | 2046 |

Source: CalRecycle 2019

Because the Miramar and Sycamore Canyon landfills are closest to the District's facilities and therefore would be the least expensive in terms of transportation costs, it is anticipated that a majority of project-generated solid waste would be disposed of at those facilities. However, project-generated solid waste could also be disposed of at Otay Annex Landfill and/or Borrego Landfill.

The disposal rate at Miramar Landfill is approximately 910,000 tons of solid waste per year, with approximately 3,900 tons of waste accepted on weekdays and lesser amounts on weekends (City of San Diego Environmental Services 2019). As shown in Table 4.15-4, Sycamore Canyon Landfill has a remaining capacity of 113,972,637 cubic yards. Other large municipal landfills within the County include Otay Annex Landfill with a remaining capacity of 21,194,008 cubic yards, and Borrego Landfill with a remaining capacity of 111,504 cubic yards. Solid waste collection would be rerouted to any of these landfills once Miramar Landfill is closed.

Diversion rates are used to report solid waste disposal in the City and to address Assembly Bill (AB) 341 recycling goals, which require each city in the state to divert at least 75% of its solid waste from landfill disposal through measures such as source reduction, recycling, and composting (see Section 4.15.3, *Applicable Laws and Regulations*). According to CalRecycle's 2017 Jurisdiction Diversion/Disposal Rate Detail for San Diego, the City meets its target employment disposal rate of

15.8 pounds per person per day with an annual rate of 10.9 pounds per person per day (CalRecycle 2017).

The District's facilities' existing solid waste generation totals 59,712 pounds per day (50,358 pounds of disposable waste and 9,354 pounds of recyclable waste), or approximately 29.9 tons per year.

### 4.15.2.5 Telecommunications

Telecommunication services are those that offer voice and data services over a large area, including phone services (landlines and/or wireless services), internet (dial-up, fiber optics, broadband), television (cable, etc.), and computer networking. As defined by Federal Standard 1037C, telecommunication facilities include the following:

- Any fixed, mobile, or transportable structure, including all installed electrical and electronic wiring, cabling, and equipment and all supporting structures, such as utility, ground network, and electrical supporting structures.
- A network-provided service to users or the network operating administration; a transmission pathway and associated equipment.
- A real property entity consisting of one or more of the following: a building, a structure, a utility system, pavement, and underlying land.

Generally, telecommunication facilities are constructed and maintained by private telecommunication companies within public rights-of-way or easements on private property. While the specific type of telecommunication facilities available within any given area may vary throughout the Program area, the Program area is currently comprehensively served by telecommunication services, including landline/wireless telephone services, internet, television, and computer networking. Generally, the District contracts with private providers for these services and does not construct or maintain their own telecommunication facilities, and existing District facilities have connections for these services installed at the time service requests are made.

## 4.15.3 Applicable Laws and Regulations

### 4.15.3.1 State

#### Water Supply

##### California Assembly Bill 1881

AB 1881, the Water Conservation in Landscaping Act of 2006, requires the Department of Water Resources to prepare an updated Model Water Efficient Landscaping Ordinance (Model Ordinance) in accordance with specified requirements to conserve water through efficient irrigation and landscaping. By January 1, 2010, local agencies were to adopt either the updated Model Ordinance or a local landscape ordinance that is at least as effective in conserving water as the Model Ordinance. The District's *Standard Design Guide*, Section G2050, Landscaping (District 2016) identifies measures to promote water conservation in landscaping at District facilities.

# Solid Waste

## California Integrated Waste Management Act

In response to reduced landfill capacity, the State of California passed the California Integrated Waste Management Act in 1989. This legislation (generally known by the name of its enacting bill, AB 939) requires cities and counties to reduce the amount of solid waste entering existing landfills through recycling, reuse, and waste prevention efforts. The purpose of AB 939 is to "reduce, recycle, and re-use solid waste generated in the state to the maximum extent feasible." AB 939 requires jurisdictions to utilize "integrated waste management"—a variety of waste management practices to safely and effectively handle the municipal solid waste stream with the least adverse impact on human health and the environment.

When first enacted, AB 939 required every city and county in the state to prepare a Source Reduction and Recycling Element in its Solid Waste Management Plan to identify how each jurisdiction planned to meet mandatory State waste diversion goals of 25% by the year 1995 and 50% by the year 2000. AB 939 also established the California Integrated Waste Management Board, the State agency designated to oversee, manage, and track California's solid waste generation each year. See Section 4.15.3.3, *Local*, for a discussion about how San Diego is implementing the requirements of AB 939 (see City Council Resolution No. R-308657).

## Assembly Bill 341 (Mandatory Commercial Recycling Law)

In order to further the goals of AB 939, statewide strategies to achieve a 75% reduction goal by 2020 were established with the adoption of AB 341 in May 2012, the main component of which implemented mandatory commercial recycling by certain businesses and public entities. Mandatory Commercial Recycling was one of the measures adopted in the Assembly Bill 32 Scoping Plan by the Air Resources Board pursuant to the California Global Warming Solutions Act (Chapter 488, Statutes of 2006). The purpose of the law is to reduce greenhouse gas (GHG) emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California (CalRecycle n.d.).

A business that generates 4 cubic yards or more of commercial solid waste per week or is a multifamily residential dwelling of five units for more must arrange for recycling services. Businesses can use one or any combination of the following methods to reuse, recycle, compost, or otherwise divert solid waste from disposal:

- Self-haul.
- Subscribe to a hauler.
- Arrange for pickup of recyclable materials.
- Subscribe to a recycling service that may include mixed waste processing that yields diversion results comparable to source separation.

In addition, each jurisdiction must implement a commercial solid waste recycling program that consists of education, outreach, and monitoring of businesses that is appropriate for that jurisdiction and is designed to divert commercial solid waste from businesses. Each jurisdiction must report the progress achieved in implementing its commercial recycling program, including outreach and monitoring, and, if applicable, enforcement efforts and exemptions, by providing updates in its electronic annual report.

# 4.15.3.2 Local

## Water Supply

### City of San Diego's 2015 Urban Water Management Plan

The California Urban Water Management Planning Act requires that each urban water supplier providing water for municipal purposes to more than 3,000 customers, or supplying more than 3,000 acre-feet of water annually, must prepare, update, and adopt a UWMP at least once every 5 years. This law applies to the City of San Diego, which is a member agency of the San Diego County Water Authority. The City prepared the 2015 UWMP to meet the State's requirements under the California Water Code and comply with the California Urban Water Management Planning Act. The plan provides information on the City's current and future water demands and supplies, discusses the water resources challenges that the City faces, and summarizes the major water resources initiatives that the City has proactively taken to ensure a safe, reliable water supply for its water customers. Specifically, the 2015 UWMP details the City's water system, water demands, sources of water supplies, water conservation efforts, climate change impacts, energy intensity, water shortage contingency planning, and projected water supply reliability during normal, dry, and multiple-year drought conditions. Availability of imported water and regional water demands and conservation were coordinated with the San Diego County Water Authority, the wholesale water provider for the City. To prepare the City's water demand forecast, coordination with SANDAG was necessary to obtain the most recent demographic projections for the City (2050 Regional Growth Forecast Update Series 13, released in September 2013). The 2015 UWMP was presented and adopted at a San Diego City Council public hearing on June 20, 2016.

## Wastewater

### City of San Diego *Sewer Design Guide*

When planning and designing wastewater facilities, the City Wastewater Branch follows the guidance and design policies of the *Sewer Design Guide* (2004, revised 2015), which summarizes and outlines relevant City policies, applicable codes, and engineering and operational practices and procedures necessary to establish a safe and efficient wastewater collection system. This document provides guidance for the City to design and maintain sewer facilities such as pump stations, gravity sewers, force mains, and associated wastewater appurtenances.

## Solid Waste

### San Diego Unified School District's Standard Construction Specifications, Section 01 74 19, Construction Waste Management and Disposal

All projects within the District are required to comply with Section 01 74 19, Construction Waste Management and Disposal, of the District's Standard Construction Specifications, which states that projects must achieve a salvage/recycling rate of 75% by weight of total non-hazardous solid waste generated by construction and/or demolition. During construction, efficient waste management in the use of materials must occur and all reasonable means must be utilized to divert construction and demolition waste from landfills and incinerators. All recyclable materials must be delivered to separated recycling facilities. Per Section 01 74 19, recycling and salvage of the following demolition

and construction materials would occur: asphalt paving, concrete, concrete reinforcing steel, brick, concrete masonry units, wood studs, wood joists, plywood and oriented strand board, wood paneling, wood trim, structural and miscellaneous steel, rough hardware, roofing, insulation, doors and frames, door hardware, windows, glazing, metal studs, gypsum board, acoustical tile and panels, carpet, carpet pad, demountable partitions, equipment, cabinets, plumbing fixtures, piping, supports and hangers, valves, sprinklers, mechanical equipment, refrigerants, electrical conduit, copper wiring, lighting fixtures, lamps, ballasts, electrical devices, switchgear and panelboards, and transformers.

## San Diego City Council Policy 900-16

Although the schools and administrative facilities are within the District's jurisdiction, solid waste is collected and processed by the City of San Diego franchised waste haulers. Consequently, City policies would apply to the collection and processing of solid waste generated by the Proposed Program.

In 2004, San Diego's Mayor and City Council enacted Council Policy 900-16, Construction & Demolition (C&D) Material Recycling, expressing the City's commitment to recycling C&D waste as an integral part of the City's comprehensive solid waste management strategy. The policy outlines the following principles for private industry.

1. Businesses, organizations, and contractors are encouraged to facilitate as much waste diversion from landfills as possible through recycling, waste reduction, and reuse.
2. Demolition, construction, and renovation project proponents should evaluate the potential for maximizing waste diversion through recycling, waste reduction, and reuse. Diversion plans should be adequately communicated with all contractors and subcontractors.
3. Diversion goals should be 100% diversion of inert materials (concrete, rock, asphalt, dirt, etc.) and at least 50% diversion of all remaining materials by weight if mixed C&D recycling facilities are available, or as much as feasible through source separation of recyclable materials if a mixed C&D facility is not available.
4. Businesses, organizations, and contractors should purchase products made from recycled materials to the maximum extent possible.

## City of San Diego Construction and Demolition Debris Deposit Ordinance

On July 1, 2008, the C&D Debris Deposit Ordinance took effect. The ordinance requires that the majority of construction, demolition, and remodeling projects requiring building, combination, and demolition permits pay a refundable C&D Debris Recycling Deposit and divert at least 65% of their debris by recycling, reusing, or donating usable materials. The ordinance is designed to keep C&D materials out of local landfills and ensure they get recycled.

## San Diego City Council Resolution No. R-308657

On December 31, 2013, the San Diego City Council passed City Council Resolution No. R-308657 to adopt a Zero Waste objective by 2040 for the City of San Diego. Through the passage of the resolution, the City of San Diego adopted a Zero Waste objective for the City with an initial goal of diverting 75% of waste generated in the City from landfill disposal by 2020 and a goal of Zero Waste by 2040. This would occur through the elimination of waste from landfill disposal and a diversion of

recyclable materials to reprocessing into usable forms with minimal transport, energy use, and harm to society and the environment. In addition, Resolution No. R-308657 directed the City's Environmental Services Department to develop a Zero Waste Plan in 2014 that establishes a framework for, and provides guidance in, the City's planning and decision-making process to achieve the City's Zero Waste objective.

### Long-Term Resource Management Options Strategic Plan

The Long-Term Resource Management Options Strategic Plan (LRMOSP) is a planning process initiated by the City of San Diego in 2007 to develop and evaluate options for managing solid waste disposal needs in San Diego through the year 2045. Miramar Landfill, the City of San Diego's only landfill, is anticipated to close under current conditions and projections in 2025. The LRMOSP assesses the City's current disposal system capabilities, projects future solid waste management demands, and presents long-term options for consideration by City staff and elected officials.

The LRMOSP is a three-phase process. Phase I consisted of a system analysis, regional demand and capacity analysis, and identification and screening of options. Phase II provides a review of the City's existing diversion programs and disposal system, and an update of future disposal demands; evaluates options to meet disposal demand after diversion programs; identifies potential system configurations; evaluates potential City roles in future solid waste management systems; provides a financial analysis for maintaining the status quo or implementing various system configurations; identifies potential revenue opportunities; and provides implementation strategies for each of the five identified system configurations. Phase III will recommend a specific strategy and configuration system, including a detailed implementation plan.

# 4.15.4 Impact Analysis

## 4.15.4.1 Methodology

The following analysis considers the existing environmental setting and regulatory environment applicable to the District. Implementation of the Proposed Program could result in significant environmental effects if construction or operation would result in the need for new or expanded utilities and service systems. The analysis focuses on issues related to utilities and service systems, including water supplies, wastewater treatment capacity and facilities, stormwater facilities, solid waste, and telecommunications. Potential direct and indirect impacts associated with the Proposed Program were evaluated and identified, taking into consideration the demand on utilities generated by the Proposed Program, as well as any physical impacts resulting from the construction of new or expanded utilities and service systems to accommodate this demand.

## 4.15.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining the significance of utilities and service systems impacts resulting from the Proposed Program. In some cases, the District has combined checklist questions to develop significance criteria because these criteria address similar issues. The determination of whether a utilities and service systems impact would be significant is based on the professional judgment of

the District as Lead Agency supported by the recommendations of qualified personnel at ICF, all of which is based on evidence in the administrative record.

Impacts are considered significant if the Proposed Program would result in any of the following:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.
3. 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.
4. 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.
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Thresholds 4 and 5 are combined for the reasons stated above, and analysis of impacts associated with energy use and the construction of new or expanded electric power and natural gas facilities is addressed in Section 4.5, *Energy*, of this PEIR.

## 4.15.4.3 Impacts and Mitigation Measures

***Threshold 1: Would the Proposed Program require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

### Program-Level Analysis

#### New Acquisition and New School or Administrative Facilities

##### Impact Discussion

###### *Construction*

A significant impact would occur if construction activities associated with implementation of the Proposed Program would require such an extensive use of water, electric power, natural gas, or telecommunications facilities, or would increase the generation of wastewater or stormwater, such that new or expanded facilities would be required and the construction of the facilities would cause a significant environmental effect.

New acquisition would be an administrative procedure and would not directly result in any physical changes to the environment. Once the site has been acquired, the construction of a new school (including charter schools) or administrative facility on that site would result in physical changes

that could have significant environmental effects. At this time, no specific sites are proposed for acquisition; however, there is a potential that currently undeveloped sites could be acquired and developed with new school or administrative facilities. The construction of a new school or administrative facility on at a project site would require the installation of new utilities to serve the facility, including offsite improvements to provide connections to any new utilities, which would involve ground-disturbing activities. Environmental effects associated with ground-disturbing activities have already been analyzed in the appropriate sections of this PEIR, including Sections 4.3, *Biological Resources*, 4.4, *Cultural Resources*, 4.6, *Geology and Soils*, and 4.8, *Hazards and Hazardous Materials*.

*Water, Wastewater Treatment, Electric Power, Natural Gas, and Telecommunications Facilities*

Water would be required during construction of new school or administrative facilities for activities such as dust suppression, including dust suppression for demolition, the mixing of concrete, and light washing of equipment and tools consistent with water quality regulations, as well as for drinking water for construction workers. Short-term dewatering may be necessary during construction of the foundations for any new facilities, depending on groundwater conditions at the site. Water usage during construction would be temporary, and reclaimed water would be used for dust suppression, equipment washing, etc., if available, which would reduce the quantity of potable water required.

During construction, it is anticipated that portable temporary restroom facilities would be brought to the site for construction workers. Wastewater generated at the portable restroom facilities would not be disposed of at the project sites but would be hauled away and the waste disposed at an appropriate facility in accordance with Regional Water Quality Control Board (RWQCB) regulations. No new wastewater treatment facilities, infrastructure improvements, or other expansions would be required as a result of construction of this project category.

In addition, most telecommunication services, such as internet, landline phones, or cable television would not be required during construction. Construction workers would make use of cellular facilities in the vicinity for phone calls or wireless data, but this would constitute a temporary and minimal increase in the demand on any local cellular facilities, such as a cell tower. This would not result in such a substantial increase in demand that new telecommunication facilities would be required. Similarly, use of electricity or natural gas would be temporary and minimal with any energy requirements likely being provided by portable generators. As such, no new natural gas or electrical facilities would be required during construction.

Based on the above, this project category's potential impacts associated with the construction of new or expanded water, wastewater, electrical, natural gas, and telecommunication facilities would be less than significant.

*Stormwater Drainage*

Trenching may be required for the installation of utilities for new school or administrative facilities. Soil stockpiling would also be required, which could temporarily increase the amount of suspended sediment in sheet flow or runoff that would enter the existing storm drain system during a rain event.

As discussed in Section 4.9, *Hydrology and Water Quality*, construction activities that would disturb more than 1 acre of land would be required to comply with the Construction General Permit, which

would require development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) by a Qualified SWPPP Developer. The SWPPP would identify which construction BMPs would be implemented in order to protect stormwater runoff and include a monitoring plan for measuring BMP effectiveness. These BMPs would include controlling the flow of sediment to stormwater facilities. As such, impacts would be less than significant.

***Operation***

*Water*

Operation of new school or administrative facilities could increase water use at a project site compared to existing conditions, depending on how the site was used prior to acquisition and development as a school or administrative facility. As discussed under Section 4.15.2, *Existing Conditions*, water service is provided to the District facilities by the City of San Diego. However, schools are considered growth accommodating uses, not growth-inducing uses. Population growth that increases water and wastewater demand in the Program area could happen irrespective of the Proposed Program. As such, while water use in a neighborhood may be redistributed to school properties from the neighborhood residential uses during the hours that school is in session, new school or administrative facilities would not result in an overall increase in the demand for water such that new or expanded water supply facilities would be required. Impacts would be less than significant.

*Wastewater Treatment*

New school or administrative facilities would be connected to the City's sanitary sewer system, where wastewater would be processed and sanitized at the NCWRP or PLWTP. As discussed under Section 4.15.2, both treatment plants currently meet the wastewater discharge requirements of their NPDES Permits. Although the operation of new and expanded school facilities could result in the increased generation of wastewater at a project site, as noted above, because schools are considered growth-accommodating uses, schools would redistribute wastewater from nearby neighborhood uses during school hours, and would not constitute an increased demand for wastewater treatment. NCWRP and PLWTP have sufficient capacity to accommodate wastewater generation related to new school or administrative facilities. Impacts would be less than significant.

*Stormwater Drainage*

Depending on the previous use of a site prior to acquisition and development as a school or administrative facility, new school or administrative facilities could increase the area of impervious surfaces in the Program area and could generate additional runoff. As part of the design process for any new school or administrative facility, the District would prepare engineering plans to ensure adequate internal site drainage. Stormwater drainage generated by a new school or administrative facility would ultimately flow offsite into the City's stormwater drainage system. As discussed in Section 4.9, *Hydrology and Water Quality*, the District currently satisfies its obligation to protect and restore California's water resources through implementation of post-construction BMPs that are similar to those required in the City's MS4 Permit. Post-construction BMPs would be designed to retain runoff (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), to reduce runoff. Per the City of San Diego's JRMP, the District must include the applicable stormwater BMPs in project building and grading plans. The JRMP dictates which post-construction BMPs to implement to prevent runoff from entering the storm drainage system. In addition, the District's *Standard Design Guide*, Section G2050, Landscaping (District 2016) identifies a number of BMPs related to

stormwater generation in parking lots in order to capture and filter runoff. These BMPs include the use of permeable pavers with underdrains, if necessary (in low-permeability soils) and bioswales that are planted with native, naturalized, and non-invasive vegetation. Furthermore, the *Standard Design Guide* specifies that any offsite improvements would comply with the City of San Diego's requirements, as discussed above. Implementation of the District's BMPs and compliance with the City's requirements would ensure that stormwater generated by any new school or administrative facilities would not require the relocation or construction of new or expanded stormwater drainage. Impacts would be less than significant.

*Telecommunications Facilities*

Operation of new school or administrative facilities would require telecommunication services. While specific sites for new school or administrative facilities are not known at this time, new school or administrative facilities would not be located within undeveloped areas where these services do not exist. Given the comprehensive coverage of such facilities within the Program area, including internet, cable, and telephone services, new school or administrative facilities would connect using existing telecommunication providers' infrastructure already provided to a project site and would not require or result in the relocation or construction of new or expanded telecommunications facilities. Therefore, impacts would be less than significant.

*Electric Power and Natural Gas*

Similar to telecommunication services, operation of new school or administrative facilities would require energy services and would increase the use of electricity and/or natural gas at a project site. However, schools are not a particularly energy-intensive land use and would not require such a substantial quantity of energy that the existing electrical and natural gas facilities could not accommodate this increase. Therefore, impacts would be less than significant. Analysis of impacts caused by new or expanded electric power facilities is addressed in Section 4.5, *Energy*, of this PEIR.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities related to new school and administrative facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

#### *Operation*

Operational activities related to new school and administrative facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities related to new school and administrative facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

#### *Operation*

Operational activities related to new school and administrative facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

Construction activities associated with whole site modernization projects could involve increased demand on water, wastewater, stormwater, electrical, natural gas, or telecommunication facilities. Additionally, construction activities could require the relocation of existing water, wastewater treatment, energy, stormwater drainage, and/or telecommunications facilities to accommodate future improvements associated with these project categories, which could require ground-disturbing activities. Environmental effects associated with ground-disturbing activities have already been analyzed in the resource sections throughout Chapter 4, *Environmental Analysis*.

*Water, Wastewater Treatment, Electric Power, Natural Gas, and Telecommunications Facilities*

Existing school sites are currently provided with water, wastewater, natural gas, and telecommunication services and would not require the extension of utilities into the project site; also, construction activities associated with whole site modernization projects would not extend beyond the existing school boundaries.

In addition, construction activities associated with these whole site modernization projects could involve demolition, grading and excavation, filling and compaction, and construction of aboveground facilities and buildings, which could require water for activities such as dust suppression, mixing of concrete, light washing of equipment and tools consistent with water quality regulations, and drinking water for construction workers. Water usage during construction would be temporary and reclaimed water could be used for dust suppression, equipment washing, etc., if available, which would reduce the quantity of potable water required. During construction, it is anticipated that portable temporary restroom facilities would be brought to the site for construction workers. Wastewater generated at the portable restroom facilities would not be disposed of at the project sites but would be hauled away and the waste disposed at an appropriate facility in accordance with RWQCB regulations. No new wastewater treatment facilities, infrastructure improvements, or other expansions would be required as a result of construction of this project category. In addition, most telecommunication services, such as internet, landline phones, or cable television would not be required during construction. Construction workers may increase use of cellular towers in the vicinity of the project site for phone calls or wireless data, but this would constitute a temporary and minimal increase in the demand on any local cellular facility. This would

not result in such a substantial increase in demand that new telecommunication facilities would be required. Similarly, use of electricity or natural gas would be temporary and minimal with any energy requirements being provided by a generator. As such, no new natural gas or electrical facilities would be required during construction and impacts would be less than significant.

*Stormwater Drainage*

Soil stockpiling may be required during construction of whole site modernization projects, which could temporarily increase the amount of suspended sediment in sheet flow or runoff that would enter the existing storm drain system during a rain event.

As discussed in Section 4.9, construction activities that would disturb more than 1 acre of land would be required to comply with the Construction General Permit, which would require development and implementation of a SWPPP by a Qualified SWPPP Developer. The SWPPP would identify which construction BMPs would be implemented in order to protect stormwater runoff and include a monitoring plan for measuring BMP effectiveness. These BMPs would include controlling the flow of sediment to stormwater facilities. For projects disturbing less than 1 acre of land, construction activities associated with whole site modernization projects would also implement construction BMPs, such as employing erosion reduction techniques at construction sites, preventing or reducing the discharge of pollutants to stormwater from solid or liquid construction waste, and dust control measures consistent with the City of San Diego's JRMP.

Therefore, construction activities associated with whole site modernization projects would not require or result in the relocation or construction of new or expanded stormwater drainage facilities to treat construction-related stormwater runoff, and impacts would be less than significant.

***Operation***

*Water and Wastewater Treatment*

Whole site modernization projects could involve substantial redevelopment of existing school properties, including those of charter schools. However, these projects would not increase the number of employees or student capacity, or include any operations that would result in greater demand for water or wastewater, which would require new or expanded water or wastewater treatment facilities. Therefore, whole site modernization projects would not result in the relocation or construction of new or expanded water or wastewater treatment utilities. Impacts would be less than significant.

*Stormwater Drainage*

Whole site modernization projects could increase the amount of impervious surface in the Program area and could generate additional runoff. However, as noted above, the District would implement stormwater BMPs identified in their *Standard Design Guide* to reduce and filter stormwater generated by improvements at their facilities. In addition, as discussed in Section 4.9, the District currently satisfies its obligation to protect and restore California's water resources through implementation of post-construction BMPs that are similar to those required in the City's MS4 Permit. Post-construction BMPs would be designed to retain runoff (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), to reduce runoff. Per the City of San Diego's JRMP, the District must implement the applicable stormwater BMPs into project building and grading plans. The JRMP dictates which post-construction BMPs to implement to prevent runoff from entering the storm drainage system. During a whole site modernization, existing utilities may need to be relocated

within the project site, which could result in environmental effects. The environmental effects associated with the relocation of utilities on an existing school and administrative site have been analyzed throughout this PEIR. Therefore, whole site modernization projects would not result in any additional significant impacts as a result of the relocation or construction of new or expanded stormwater drainage utilities. Impacts would be less than significant.

*Electric Power, Natural Gas, and Telecommunication Facilities*

Operation of whole site modernization projects would not result in any operational changes as there would be no increase in student capacity or number of staff at existing District schools or administrative facilities. Therefore, it is not anticipated that whole site modernization projects would require a substantial increase in electric power, natural gas, and telecommunications. Therefore, whole site modernization projects would not result in any additional significant impacts as a result of the relocation or construction of new or expanded electric power, natural gas, and telecommunications utilities. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities related to whole site modernization projects would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

#### *Operation*

Operational activities related to whole site modernization projects would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities related to whole site modernization projects would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

#### *Operation*

Operational activities related to whole site modernization projects would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Construction activities associated with the Upgrades of Existing School and Administrative Sites project category would vary depending on the type of improvement but would be short-term, with the construction period typically occurring over less than a year. Heavy equipment would not be necessary. Limited ground-disturbing activities could be conducted for some improvements, such as upgrades to existing underground utilities. No substantial ground disturbance or major demolition is expected that could require water for activities such as dust suppression. Temporary portable restrooms may be provided, the use of which would be short-term and infrequent due to the low intensity of construction activities. Therefore, the increased water, wastewater, electrical, natural gas, or telecommunication use would be short term and negligible, as would the increase in wastewater.

As a result, construction associated with this category would not result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electrical, natural gas, or telecommunications facilities. Impacts would be less than significant.

#### *Operation*

*Water and Wastewater Treatment*

Upgrades of existing school and administrative sites would not increase the number of employees or student capacity, or change operations such that there would be a greater demand for water or wastewater, which would require new or expanded water or wastewater treatment facilities. Therefore, this project category would not result in the relocation or construction of new or expanded water or wastewater treatment utilities. Impacts would be less than significant.

*Stormwater Drainage*

Because existing school and administrative sites are largely built-out, and upgrades of existing school and administrative facilities would only involve minimal exterior improvements and interior modernization upgrades, this project category would not result in a substantial increase in the amount of impervious surface in the Program area and would not generate additional runoff. Impacts would be less than significant.

*Electric Power, Natural Gas, and Telecommunication Facilities*

Upgrades of existing school and administrative facilities would not result in any operational changes as there would be no increase in student capacity or number of staff at District schools or administrative facilities. Therefore, this project category would not result in a substantial increase in electric power, natural gas, and telecommunications. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities related to upgrades of existing school and administrative facilities would not result in the relocation or construction of new or expanded water, wastewater treatment,

stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

***Operation***

Operational activities related to upgrades of existing school and administrative facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

***Construction***

Construction activities related to upgrades of existing school and administrative facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

***Operation***

Operational activities related to upgrades of existing school and administrative facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

***Construction***

Construction activities associated with joint-use facilities development could involve increased demand on water, wastewater, stormwater, electrical, natural gas, or telecommunication facilities. Additionally, construction activities could require the relocation of existing water, wastewater treatment, energy, stormwater drainage, and/or telecommunications facilities to accommodate future improvements associated with joint-use facilities, which could require ground-disturbing activities. Environmental effects associated with ground-disturbing activities have already been analyzed in the appropriate resource sections throughout Chapter 4 of this PEIR.

*Water, Wastewater Treatment, Electric Power, Natural Gas, and Telecommunications Facilities*

Joint-use facilities are currently located at sites where water, wastewater, natural gas, and telecommunication services are provided; also, construction activities associated with joint-use facilities development would not extend beyond the existing school boundaries. Construction activities associated with joint-use facilities development could involve demolition, grading and excavation, filling and compaction, and construction of aboveground facilities and buildings, which could require water for activities such as dust suppression, mixing of concrete, light washing of

equipment and tools consistent with water quality regulations, and drinking water for construction workers. Water usage during construction would be temporary, and reclaimed water could be used for dust suppression, equipment washing, etc., if available, which would reduce the quantity of potable water required.

During construction, it is anticipated that portable temporary restroom facilities would be brought to the site for construction workers. Wastewater generated at the portable restroom facilities would not be disposed of at the project sites but would be hauled away and the waste disposed of at an appropriate facility in accordance with RWQCB regulations. No new wastewater treatment facilities, infrastructure improvements, or other expansions would be required as a result of construction associated with joint-use facilities development.

In addition, most telecommunication services, such as internet, landline phones, or cable television, would not be required during construction. Construction workers may increase use of cellular towers in the vicinity of the project site for phone calls or wireless data, but this would constitute a temporary and minimal increase in the demand on any local cellular facility. This would not result in such a substantial increase in demand that new telecommunication facilities would be required. Similarly, use of electricity or natural gas would be temporary and minimal with any energy requirements being provided by a generator. As such, no new natural gas or electrical facilities would be required during construction, and impacts would be less than significant.

*Stormwater Drainage*

During joint-use facilities development, trenching may be required for the installation of utilities, and deep excavation would be required for the construction of pools. Soil stockpiling would also be required, which could temporarily increase the amount of suspended sediment in sheet flow or runoff that would enter the existing storm drain system during a rain event.

As discussed in Section 4.9, construction activities that would disturb more than 1 acre of land would be required to comply with the Construction General Permit, which would require development and implementation of a SWPPP by a Qualified SWPPP Developer. The SWPPP would identify which construction BMPs would be implemented in order to protect stormwater runoff and include a monitoring plan for measuring BMP effectiveness. These BMPs would include controlling the flow of sediment to stormwater facilities. For projects disturbing less than 1 acre of land, construction activities associated with joint-use facilities would also implement construction BMPs, such as employing erosion reduction techniques at construction sites, preventing or reducing the discharge of pollutants to stormwater from solid or liquid construction waste, and dust control measures consistent with the City of San Diego's JRMP.

Therefore, construction activities associated with joint-use facilities would not require or result in the relocation or construction of new or expanded stormwater drainage facilities to treat construction-related stormwater runoff, and impacts would be less than significant.

***Operation***

*Water and Wastewater Treatment*

Operation of joint-use facilities could result in increased water use and wastewater for maintenance, drinking fountains, restrooms, and concession facilities. In addition, new athletic fields or pools would increase the water use compared to existing conditions. Development of new joint-use facilities could involve replacement of decomposed granite with natural turf and construction of

new pools. Filling pools would be a one-time occurrence and, once filled, would only require minor additions to keep the water at recommended levels. Operation of natural turf areas used for active recreation would require watering approximately three times a week. The District may install new water meters and backflow preventers to accommodate irrigation for the natural turf multi-purpose fields.

The City is generally responsible for the provision and cost of water used to properly maintain the fields. According to the City's Municipal Code, the Parks and Recreation Department (PRD) is exempt from watering time restrictions; however, it must comply with targeted water-use restrictions, including reductions of overall water use. Active recreational turf areas are currently irrigated three times per week. However, in the future, if watering restrictions increase, watering may decrease to comply with meeting required conservation mandates (City of San Diego 2016). In addition, irrigation is permitted any day/time for the establishment, repair, and renovation of public-use fields for schools and parks. PRD applies watering methodologies to irrigate responsibly within San Diego's various climate zones. Sufficient water supplies are available to supply future joint-use facility projects, and impacts would be less than significant.

The operation of new athletic fields, pools, drinking fountains, etc. may result in increased wastewater at the project site, but as noted above, these facilities are considered redistributive uses within a neighborhood and would not result in increased wastewater such that new wastewater treatment facilities would be required. Impacts would be less than significant.

*Stormwater Drainage*

Joint-use facilities would not result in a substantial increase in the amount of impervious surface area at a project site, and due to the fact that many of these projects would involve replacement of decomposed granite with natural turf, this project category could result in a reduction of impervious surface area. However, as discussed above, the District would implement BMPs into building and grading plans, per the City's JRMP. In addition, the District's *Standard Design Guide*, Section G2050, Landscaping (District 2016) identifies a number of BMPs related to stormwater generation in parking lots in order to capture and filter runoff. These BMPs include the use of permeable pavers with underdrains, if necessary (in low-permeability soils) and bioswales that are planted with native, naturalized, and non-invasive vegetation. Furthermore, the *Standard Design Guide* specifies that any offsite improvements would comply with the City of San Diego's requirements, which could include improvements to storm drains.

Therefore, operation of joint-use facilities would not require or result in the relocation or construction of new or expanded stormwater drainage facilities. Impacts would be less than significant.

*Electric Power and Natural Gas*

Operation of heating, ventilation, and air conditioning (HVAC) units within recreation buildings would result in a moderate increase in the use of electrical power. In addition, the operation of heated pools would also result in a moderate increase in the use of electrical power. These moderate increases in the demand for electric power and natural gas are not expected to exceed the capacity of the existing infrastructure. Therefore, operation of this project category would not require or result in the relocation or construction of new or expanded electrical or natural gas facilities. Therefore, impacts would be less than significant.

*Telecommunications Facilities*

Operation of joint-use facilities would result in minimal demand on telecommunication facilities for the provision of telephone or internet services within a recreation building, but would not require or result in the relocation or construction of new or expanded telecommunications facilities. Therefore, impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities related to joint-use facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

#### *Operation*

Operation of joint-use facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities related to joint-use facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

#### *Operation*

Operation of joint-use facilities would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

## Site-Specific Analysis

### Impact Discussion

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.15-5. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the whole site modernization project category, as described further in Chapter 3, *Project Description*.

**Table 4.15-5. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K-8 School | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K-8 School | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019.

### Construction

All 21 of the near-term, site-specific projects involve whole site modernizations. As discussed above under the program-level analysis, whole site modernization projects may require the extension or relocation of utilities within the site, including water or wastewater pipes, or connections to electrical, natural gas, or storm drain facilities, the impacts of which have been identified within analyses for resources that could be affected by ground-disturbing activities. However, as discussed above, any short-term increase in demand on utilities during construction activities would be minor and could be accommodated by the existing utilities infrastructure. Therefore, potential impacts associated with the construction of new or expanded water, wastewater treatment or stormwater drainage, and electric power, natural gas, and telecommunication facilities would be less than significant.

### Operation

Operational activities associated with the 21 near-term whole site modernization projects would not result in any increase in student capacity or employment, and while demand on water supply, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunication services may increase due to new or expanded buildings, this increase would be minimal compared to existing conditions and would not exceed the capacity of the existing facilities to meet the

demand. As part of these near-term whole site modernization projects, utilities may need to be relocated within the project site that have a potential to result in environmental effects. The environmental effects associated with the relocation of utilities on an existing school and administrative site have been analyzed throughout this PEIR. Therefore, the near-term, site-specific whole site modernization projects would not result in any additional significant impacts as a result of the relocation or construction of new or expanded utilities. Impacts would be less than significant.

## Level of Significance Prior to Mitigation

### Construction

Construction activities associated with the near-term, site-specific whole site modernization projects would not result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

### Operation

Operation of the 21 near-term, site-specific whole site modernization projects would not result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

### Construction

Construction activities associated with the near-term, site-specific whole site modernization projects would not result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

### Operation

Operation of the 21 near-term, site-specific whole site modernization projects would not result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant.

***Threshold 2: Would the Proposed Program have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?***

# Program-Level Analysis

## New Acquisition and New School or Administrative Facilities

### Impact Discussion

#### *Construction*

Construction activities associated with new school or administrative facilities could result in activities such as grading and excavation, filling and compaction, and construction of aboveground facilities and buildings, which could require water for activities such as dust suppression, mixing of concrete, light washing of equipment and tools consistent with water quality regulations, and drinking water for construction workers. Water usage during construction would be temporary and it is possible that reclaimed water could be used for dust suppression, equipment washing, etc., which would reduce the quantity of potable water required. Sufficient water supplies are available to serve construction activities associated with new school and administrative facilities and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

#### *Operation*

As discussed under Threshold 1, operation of new school or administrative facilities could increase water use compared to existing conditions, depending on how the site was used prior to acquisition and development as a school or administrative facility. However, schools are growth-accommodating, not growth-inducing, uses. Population growth that increases water and wastewater demand in the Program area could happen irrespective of the Proposed Program. As such, while water use and wastewater generation in a neighborhood may be redistributed to school properties from the neighborhood residential uses during the hours that school is in session, new school or administrative facilities would not result in an overall increase in the demand for water. Therefore, sufficient water supplies would be available to serve these projects during normal, dry, and multiple dry years. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with new school or administrative facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

#### *Operation*

Operation associated with new school or administrative facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with new school and administrative facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

#### *Operation*

Operation associated with new school and administrative facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

Construction activities associated with whole site modernization projects could result in activities such as grading and excavation, filling and compaction, and construction of aboveground facilities and buildings, which could require water for activities such as dust suppression, mixing of concrete, light washing of equipment and tools consistent with water quality regulations, and drinking water for construction workers. Water usage during construction would be temporary, and it is possible that reclaimed water could be used for dust suppression, equipment washing, etc., which would reduce the quantity of potable water required. Sufficient water supplies are available to serve construction activities associated with whole site modernizations and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

#### *Operation*

Whole site modernization projects could involve substantial redevelopment of existing school properties, including charter schools, as well as upgrades to existing schools. Although the operations of this project category vary, whole site modernizations would not result in an increase in employees or student capacity, or change operations such that there would be a greater demand for water supplies. Because whole site modernization projects would not result in an increase in capacity, there would be sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with whole site modernization projects would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

***Operation***

Operation associated with whole site modernization projects would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

***Construction***

Construction activities associated with whole site modernization projects would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

***Operation***

Operation associated with whole site modernization projects would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

***Construction***

Construction activities associated with upgrades of existing school and administrative sites would generally result in minimal or no ground-disturbing activities and would not require the use of heavy equipment. The upgrades would generally involve minimal exterior improvements and largely interior modernization. As such, this project category would not likely require a substantial amount of water supplies. In addition, the construction period would typically last less than a year. Any construction-related water use for upgrades of existing school and administrative sites would be temporary. Impacts would be less than significant.

***Operation***

Upgrades of existing school and administrative sites projects would generally comprise minimal improvements and modernizations. Although the operations of this project category vary, upgrades of existing school and administrative sites would not result in an increase in employees or student capacity, or change operations such that there would be a greater demand for water supplies. Because these project categories would not result in an increase in capacity, there would be sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

#### *Operation*

Operation associated with upgrades of existing school and administrative facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

#### *Operation*

Operation associated with upgrades of existing school and administrative facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

Construction activities associated with joint-use facilities could result in activities such as grading and excavation, filling and compaction, and construction of aboveground facilities and buildings, which could require water for activities such as dust suppression, mixing of concrete, light washing of equipment and tools consistent with water quality regulations, and drinking water for construction workers. Water usage during construction would be temporary, and it is possible that reclaimed water could be used for dust suppression, equipment washing, etc., which would reduce the quantity of potable water required. Sufficient water supplies are available to serve construction activities associated with joint-use facilities and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

***Operation***

As described under Threshold 1, operation of natural turf areas used for active recreation would require watering approximately three times a week. The District may install new water meters and backflow preventers to accommodate irrigation for the natural turf multi-purpose fields. The City is generally responsible for the provision and cost of water used to properly maintain the fields. Operation of pools would result in increased water use and wastewater for associated maintenance, drinking fountains, restrooms, and concession facilities.

According to the City's Municipal Code, the PRD is exempt from watering time restrictions; however, it must comply with targeted water-use restrictions, including reductions of overall water use. Active recreational turf areas are currently irrigated three times per week. However, in the future, if watering restrictions increase, watering may decrease to comply with meeting required conservation mandates (City of San Diego 2016). In addition, irrigation is permitted any day/time for the establishment, repair, and renovation of public-use fields for schools and parks. PRD applies watering methodologies to irrigate responsibly within San Diego's various climate zones. Therefore, sufficient water supplies are available to supply the Proposed Program and impacts are less than significant.

**Level of Significance Prior to Mitigation**

***Construction***

Construction activities associated with joint-use facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

***Operation***

Operation associated with joint-use facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

**Mitigation Measures**

No mitigation is required.

**Level of Significance After Mitigation**

***Construction***

Construction activities associated with joint-use facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

***Operation***

Operation associated with joint-use facilities would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

# Site-Specific Analysis

## Impact Discussion

### Construction

Construction activities associated with the 21 near-term, site-specific whole site modernization projects could result in activities such as grading and excavation, filling and compaction, and construction of aboveground facilities and buildings, which could require water for activities such as dust suppression, mixing of concrete, light washing of equipment and tools consistent with water quality regulations, and drinking water for construction workers. Water usage during construction would be temporary, and it is possible that reclaimed water could be used for dust suppression, equipment washing, etc., which would reduce the quantity of potable water required. Sufficient water supplies are available to serve construction activities associated with the near-term, site-specific whole site modernizations and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

### Operation

The 21 near-term, site-specific whole site modernization projects could involve substantial redevelopment of the existing school properties identified on Table 3-2 in Chapter 3, *Project Description*. Upgrades of existing school and administrative sites would generally be minimal improvements and modernizations. However, these projects would not result in an increase in employees or student capacity, or change operations such that there would be a substantially greater demand for water supplies. Since these project categories would not result in an increase in capacity, there would be sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

## Level of Significance Prior to Mitigation

### Construction

Construction activities associated with the 21 near-term, site-specific whole site modernization projects would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

### Operation

Operation associated with the 21 near-term, site-specific whole site modernization projects would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### Construction

Construction activities associated with implementation of the 21 near-term, site-specific whole site modernization projects would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

#### Operation

Operation associated with the 21 near-term, site-specific whole site modernization projects would not result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

***Threshold 3: Would the Proposed Program 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?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

During construction activities associated with new school and administrative facilities, it is anticipated that portable temporary restroom facilities would be brought to the project sites for construction workers. Wastewater generated at the portable restroom facilities would be hauled away to an authorized sanitation cleaning facility that will treat the waste safely and sanitarily. Portable restroom services would be provided by sanitation companies that handle waste removal in accordance with RWQCB regulations. Construction of new school and administrative facilities is not anticipated to generate significant amounts of wastewater. Therefore, wastewater treatment providers would have adequate capacity to serve wastewater demand during construction.

##### *Operation*

Although the operation of new school or administrative facilities could result in the generation of increased wastewater at a project site, as noted above, schools would redistribute wastewater from nearby neighborhood uses during school hours, and this use would not constitute an increased demand for wastewater treatment. The NCWRP and PLWTP have sufficient capacity to accommodate wastewater generation related to new school or administrative facilities. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with new school or administrative facilities would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater facilities. Impacts would be less than significant.

#### *Operation*

Operation associated with new school or administrative facilities would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater facilities. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with new school or administrative facilities would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater facilities. Impacts would be less than significant.

#### *Operation*

Operation associated with new school or administrative facilities would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater facilities. Impacts would be less than significant.

## All Other Project Categories

### Impact Discussion

#### *Construction*

During construction activities associated with Whole Site Modernization projects, it is anticipated that portable temporary restroom facilities would be brought to the project sites for construction workers. Wastewater generated at the portable restroom facilities would be hauled away to an authorized sanitation cleaning facility that will treat the waste safely and sanitarily. Portable restroom services would be provided by sanitation companies that handle waste removal in accordance with RWQCB regulations. Construction of whole site modernizations is not anticipated to generate significant amounts of wastewater. Therefore, wastewater treatment providers would have adequate capacity to serve wastewater demand during construction.

Construction activities associated with Upgrades of Existing School and Administrative Sites would generally be minimal exterior improvements and largely interior modernizations. Construction activities associated with Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program—such as installation of fields, walking tracks, parking, or other recreational facilities—would generally involve short-term construction activities such as the removal of existing

decomposed granite fields and installation of new recreational facilities. The types of activities proposed—including pipe replacement, upgrading existing HVAC, and replacing existing doors and windows—would not result in the generation of a substantial amount of wastewater. As such, these project categories would not likely result in the generation of wastewater that would exceed the capacity of existing wastewater facilities during construction. Impacts associated with construction activities occurring for whole site modernizations, upgrades of school and administrative facilities, and joint-use facilities development would be less than significant.

***Operation***

Student capacity would not increase at existing school or administrative sites, and there would be no substantial increase in wastewater associated with Whole Site Modernization, Upgrades of Existing School and Administrative Sites, or Joint-Use Facilities Development, Including Fields, Pools, Play All Day Program projects. Joint-use facility users would generate additional wastewater; however, the amount would be negligible and would not exceed the capacity of existing wastewater facilities. No additional wastewater generation is anticipated for these activities. As such, operations following whole site modernizations, upgrades of school and administrative facilities, and joint-use facilities development would not exceed the capacity of existing wastewater facilities and impacts would be less than significant.

### Level of Significance Prior to Mitigation

***Construction***

Construction activities associated with whole site modernizations, upgrades of school and administrative facilities, and joint-use facilities development would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater facilities. Impacts would be less than significant.

***Operation***

Operation associated with whole site modernizations, upgrades of school and administrative facilities, and joint-use facilities development would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater facilities. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

***Construction***

Construction activities associated with whole site modernizations, upgrades of school and administrative facilities, and joint-use facilities development would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater facilities. Impacts would be less than significant.

***Operation***

Operation associated with whole site modernizations, upgrades of school and administrative facilities, and joint-use facilities development would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater facilities. Impacts would be less than significant.

# Site-Specific Analysis

## Impact Discussion

### Construction

During construction of the 21 near-term, site-specific whole site modernization projects, it is anticipated that portable temporary restroom facilities would be brought to the project sites for construction workers. Wastewater generated at the portable restroom facilities would be hauled away to an authorized sanitation cleaning facility that will treat the waste safely and sanitarily. Portable restroom services would be provided by sanitation companies that handle waste removal in accordance with RWQCB regulations. Construction of the 21 near-term, site-specific whole site modernization projects is not anticipated to generate significant amounts of wastewater. Therefore, wastewater treatment providers would have adequate capacity to serve the near-term, site-specific whole site modernization project demand during construction.

### Operation

The near-term, site-specific whole site modernization projects would not increase student or staff capacity at existing school sites, and would not result in a substantial increase in wastewater. As such, operation of the 21 near-term, site-specific whole site modernization projects would not exceed the capacity of existing wastewater facilities, and impacts would be less than significant.

## Level of Significance Prior to Mitigation

### Construction

Construction of the near-term, site-specific whole site modernization projects would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater treatment facilities. Impacts would be less than significant.

### Operation

Operation associated with the 21 near-term, site-specific whole site modernization projects would not generate a substantial amount of wastewater compared to existing conditions and would not exceed the capacity of the existing wastewater treatment facilities. Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### Construction

Construction of the near-term, site-specific whole site modernization projects would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater treatment facilities. Impacts would be less than significant.

#### Operation

Operational activities associated with the near-term, site-specific whole site modernization projects would not generate a substantial amount of wastewater. Impacts would be less than significant.

***Threshold 4: Would the Proposed Program 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?***

***Threshold 5: Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

##### *Construction*

Construction of new school or administrative facilities may involve demolition of existing facilities. During construction, the majority of construction and demolition debris would be diverted from landfills by using recycling, reuse, and diversion programs in accordance with AB 939 and the City's C&D Debris Deposit Ordinance. Materials that are not recyclable would be taken to the Miramar or Sycamore Canyon landfills. As discussed in Section 4.15.2, the disposal rate at Miramar Landfill is approximately 910,000 tons of solid waste per year; the landfill is projected to reach full capacity in 2030. Sycamore Canyon Landfill has a remaining capacity of 113,972, 637 cubic yards and is projected to reach capacity in 2042.

During construction of new school or administrative facilities, the District would be required to comply with AB 939, which mandates that projects requiring building permits pay a refundable waste diversion deposit, and reduce the amount of solid waste entering existing landfills through recycling, reuse, and waste prevention efforts.

Diversion rates are used to report solid waste disposal in the City and to address AB 939 recycling goals, which require each city in the state to divert at least 50% of its solid waste from landfill disposal through measures such as source reduction, recycling, and composting (see Section 4.15.3). According to CalRecycle's 2017 Jurisdiction Diversion/Disposal Rate Detail for San Diego, the City meets its target employment disposal rate of 15.8 pounds per person per day with an annual rate of 10.9 pounds per person per day (CalRecycle 2017). The District's Standard Construction Specification required diversion rate is 75%, which meets requirements of AB 939. Compliance with these applicable regulations would ensure that solid waste generated by construction of new school

or administrative facilities would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. As such, new school or administrative facilities would not 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. Impacts would be less than significant.

***Operation***

The Proposed Program includes the operation of new school or administrative sites, which would result in the generation of solid waste. Because the District does not currently have specific criteria for quantifying impacts related to solid waste generation and disposal, and solid waste is collected and processed by the City of San Diego franchised waste haulers, the City's threshold of 1,500 tons per year is used to determine whether this project category would result in an impact on solid waste facilities. It is anticipated that disposable solid waste generated during operation of new school or administrative facilities would be below the City's thresholds, and the Miramar and Sycamore Canyon landfills would have sufficient permitted capacity to accommodate solid waste generated by new school or administrative facilities. In addition, the District would be required to comply with AB 939 as well as their own Standard Construction Specification required diversion rate of 75%, which would reduce the amount of solid waste entering existing landfills through recycling, reuse, and waste prevention efforts. Compliance with these applicable regulations would ensure that solid waste generated by operations of a new school or administrative facility would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

**Level of Significance Prior to Mitigation**

***Construction***

Construction associated with new school or administrative facilities would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

***Operation***

Operations associated with new school or administrative facilities would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

**Mitigation Measures**

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction associated with new school or administrative facilities would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

#### *Operation*

Operations associated with new school or administrative facilities would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

Construction associated with whole site modernization projects may involve demolition of existing facilities. During construction, the majority of construction and demolition debris would be diverted from landfills by using recycling, reuse, and diversion programs in accordance with AB 939 and the City's C&D Debris Deposit Ordinance. Materials that are not recyclable would be taken to the Miramar or Sycamore Canyon landfills. As discussed in Section 4.15.2, the disposal rate at Miramar Landfill is approximately 910,000 tons of solid waste per year; the landfill is projected to reach full capacity in 2030. Sycamore Canyon Landfill has a remaining capacity of 113,972, 637 cubic yards and is projected to reach capacity in 2042.

During construction of whole site modernization projects, the District would be required to comply with AB 939, which mandates that projects requiring building permits pay a refundable waste diversion deposit, and reduce the amount of solid waste entering existing landfills through recycling, reuse, and waste prevention efforts.

Diversion rates are used to report solid waste disposal in the City and to address AB 939 recycling goals, which require each city in the state to divert at least 50% of its solid waste from landfill disposal through measures such as source reduction, recycling, and composting (see Section 4.15.3). According to CalRecycle's 2017 Jurisdiction Diversion/Disposal Rate Detail for San Diego, the City meets its target employment disposal rate of 15.8 pounds per person per day with an annual rate of 10.9 pounds per person per day (CalRecycle 2017). The District's Standard Construction Specification required diversion rate is 75%, which meets requirements of AB 939. Compliance with these applicable regulations would ensure that solid waste generated by construction of a whole site modernization project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. As such, whole site modernization projects would not 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. Impacts would be less than significant.

***Operation***

Whole site modernization projects would not increase student capacity or faculty at existing school or administrative sites and would not increase solid waste generation at these facilities beyond what occurs under existing conditions. Similar to the other project categories, operational activities occurring under whole site modernization projects would continue to comply with AB 939 and the District's Standard Construction Specification required diversion rate of 75%. Compliance with these applicable regulations would ensure that solid waste generated by operation would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

**Level of Significance Prior to Mitigation**

***Construction***

Construction associated with whole site modernization projects would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

***Operation***

Operations associated with whole site modernization projects would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

**Mitigation Measures**

No mitigation is required.

**Level of Significance After Mitigation**

***Construction***

Construction associated with whole site modernization projects would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

***Operation***

Operations associated with whole site modernization projects would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

## Upgrades of Existing School and Administrative Sites

### Impact Discussion

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites would generally be minimal exterior improvements and largely interior modernizations. The types of activities proposed, such as pipe replacement, upgrading existing HVAC, and replacing existing doors and windows, would potentially result in the generation of construction and demolition debris. As noted above, any construction debris would be diverted from landfills in accordance with AB 939 and the City's C&D Debris Deposit Ordinance. In addition, the District's Standard Construction Specification required diversion rate is 75%, which meets requirements of AB 939. Compliance with these applicable regulations would ensure that solid waste generated by construction during upgrades of existing school and administrative sites projects would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Thus solid waste generated during such construction would not exceed the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

#### *Operation*

Upgrades of existing school and administrative facilities would not increase student capacity or faculty and would not increase solid waste generation at these facilities beyond what occurs under existing conditions. Similar to the other project categories, operational activities would continue to comply with AB 939 and the District's Standard Construction Specification required diversion rate of 75%. Compliance with these applicable regulations would ensure that solid waste generated during operations following an upgrade of an existing school or administrative facility would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction associated with upgrades of existing school and administrative sites would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

#### *Operation*

Operations associated with upgrades of existing school and administrative sites would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction associated with upgrades of existing school and administrative sites would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

#### *Operation*

Operations associated with upgrades of existing school and administrative sites would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

## Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

For joint-use facilities development, construction activities could include installation of fields, walking tracks, parking, or other recreational facilities that would involve removal of existing decomposed granite fields. Construction of pools would require excavation of existing structures or soil. Demolition and construction debris would be diverted from landfills in accordance with AB 939 and the City's C&D Debris Deposit Ordinance. In addition, as noted above, the District's Standard Construction Specification required diversion rate is 75%, which meets the requirements of AB 939. As such, joint-use facilities development would not 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 during construction. Impacts would be less than significant.

#### *Operation*

Joint-use facilities may include the operation of sports fields, walking tracks, pools, and associated facilities such as equipment buildings, bleachers, restrooms, and concessions facilities. Operation of these facilities would increase the generation of solid waste over existing conditions, but similar to the other project categories, joint-use facilities would comply with AB 939 and the District's Standard Construction Specification required diversion rate of 75%. Compliance with these applicable regulations would ensure that solid waste generated by operation of joint-use facilities would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction associated with joint-use facilities development would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

#### *Operation*

Operations associated with joint-use facilities would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction associated with joint-use facilities development would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

#### *Operation*

Operations associated with joint-use facilities would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

## Site-Specific Analysis

### Impact Discussion

#### Construction

During construction of the near-term, site-specific whole site modernization projects, the majority of construction and demolition debris would be diverted from landfills by using recycling, reuse, and diversion programs in accordance with AB 939 and the City's C&D Debris Deposit Ordinance. Materials that are not recyclable would be taken to Miramar or Sycamore Canyon Landfills. In addition, these whole site modernization projects would be required to comply with AB 939, which mandates that projects requiring building permits pay a refundable waste diversion deposit, and

reduce the amount of solid waste entering existing landfills through recycling, reuse, and waste prevention efforts.

Compliance with these applicable regulations would ensure that solid waste generated by construction of the near-term, site-specific whole site modernization projects would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. As such, the near-term, site-specific whole site modernization projects would not 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. Impacts would be less than significant.

#### Operation

The near-term, site-specific whole site modernization projects would not increase student capacity or faculty at existing school sites and would not increase solid waste generation at these facilities beyond what occurs under existing conditions. Operational activities occurring under near-term, site-specific whole site modernization projects would continue to comply with AB 939 and the District's Standard Construction Specification required diversion rate of 75%. Compliance with these applicable regulations would ensure that solid waste generated by operation would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

## Level of Significance Prior to Mitigation

#### Construction and Operation

Construction and operation of the near-term, site-specific whole site modernization projects would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

#### Construction and Operation

Construction and operation of the near-term, site-specific whole site modernization projects would not 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; or fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

# 4.16.1 Overview

This section describes the existing conditions and applicable laws and regulations for wildfire, followed by an analysis of the Proposed Program's potential to: (1) expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires; (2) exacerbate wildfire risk and expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; (3) require the installation or maintenance of associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts on the environment; and (4) expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes.

Table 4.16-1 summarizes the significant impacts and mitigation measures (MMs) discussed in Section 4.16.4.3, *Impacts and Mitigation Measures*.

**Table 4.16-1. Summary of Significant Wildfire Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **New Acquisition and New School or Administrative Facilities** | | | |
| **Impact-WF-1:** Potential to Exacerbate the Risk of Wildfire During Construction of New Acquisition and New School or Administrative Facilities Projects. | **MM-WF-1:** Prepare a Construction Fire Protection Plan. | Significant and Unavoidable | Without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of a Construction Fire Protection Plan would effectively reduce the potential impacts to less than significant. |
| **Impact-WF-2:** Potential to Exacerbate the Risk of Wildfire During Operation. | **MM-WF-2:** Prepare a Fire Protection Plan. | Significant and Unavoidable | Without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of a Fire Protection Plan would effectively reduce the potential impacts to less than significant. |
| **Impact-WF-3:** Potential to Exacerbate the Risk of Wildfire and Expose Project Occupants to | **MM-WF-1:** Prepare a Construction Fire Protection Plan. | Significant and Unavoidable | Without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| Pollutants or Uncontrolled Spread of Wildfire During Construction. | | | the preparation and implementation of a Construction Fire Protection Plan would effectively reduce the potential impacts to less than significant. |
| **Impact-WF-4:** Potential to Expose Project Occupants to Pollutants or Uncontrolled Spread of Wildfire During Operation. | **MM-WF-2:** Prepare a Fire Protection Plan. | Significant and Unavoidable | Without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of a Fire Protection Plan would effectively reduce the potential impacts to less than significant. |
| **Impact-WF-5:** Exacerbate Wildfire Risk from the Installation of New Infrastructure During Construction of New Acquisition and New School or Administrative Facilities Projects. | **MM-WF-1:** Prepare a Construction Fire Protection Plan. | Significant and Unavoidable | Because the locations of new acquisition and new school or administrative facilities projects are unknown, and the types of infrastructure needed at these future locations are unknown, it cannot be assured that MM-WF-1 would reduce potential impacts related to exacerbating wildfire risk to less than significant. |
| **Impact-WF-6:** Exacerbate Wildfire Risk from the Maintenance of Infrastructure or Fire Breaks. | **MM-WF-2:** Prepare a Fire Protection Plan. | Significant and Unavoidable | Because the locations of new acquisition and new school or administrative facilities projects are unknown, and the types of infrastructure needed at these future locations are unknown, it cannot be assured that MM-WF-2 would reduce potential impacts related to exacerbating wildfire risk to less than significant. |
| **Impact-WF-9:** Expose People or Structures to Significant Risks from Post-Fire Hazards During Construction. | **MM-WF-1:** Prepare a Construction Fire Protection Plan. | Significant and Unavoidable | The Construction Fire Protection Plan would include safety measures that would reduce potential wildfire risks to construction workers on site; however, because the locations of future new acquisitions and new school |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | or administrative facilities projects are not known, the potential post-fire hazards at the site are also unknown. |
| **Impact-WF-10:** Expose People or Structures to Significant Risks from Post-Fire Hazards During Operation. | **MM-WF-2:** Prepare a Fire Protection Plan. | Significant and Unavoidable | Because the locations of new acquisitions and new school or administrative facilities projects are not known, the potential post-fire hazards at the sites cannot be known. |
| **Whole Site Modernization** | | | |
| **Impact-WF-7:** Exacerbate Wildfire Risk from the Installation of New Infrastructure During Construction of Whole Site Modernization Projects. | **MM-WF-1:** Prepare a Construction Fire Protection Plan. | Significant and Unavoidable | Because the locations of new acquisition and new school or administrative facilities projects are unknown, and the types of infrastructure needed at these future locations are unknown, it cannot be assured that MM-WF-1 would reduce potential impacts related to exacerbating wildfire risk to less than significant. |
| **Upgrades of Existing School and Administrative Sites** | | | |
| All impacts on wildfire related to Upgrades of Existing School and Administrative Sites are less than significant. | No mitigation is required. | N/A | N/A |
| **Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program** | | | |
| All impacts on wildfire related to Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program are less than significant. | No mitigation is required. | N/A | N/A |
| **Near-Term, Site-Specific Whole Site Modernization Projects** | | | |
| **Impact-WF-8:** Exacerbate Wildfire Risk from the Installation of New Infrastructure. | **MM-WF-1:** Prepare a Construction Fire Protection Plan. | Less than Significant | MM-WF-1 would ensure preparation of a Construction Fire Protection Plan to mitigate the risk of wildfire impacts related to utility construction. |

# 4.16.2 Existing Conditions

## 4.16.2.1 Regional and Local Wildfire Risk

Wildfire, as defined in California Public Resources Code (PRC) Sections 4103 and 4104, is any uncontrolled fire spreading through vegetative fuels that threatens to destroy life, property, or resources. In the last two decades, wildfires in California have shown an increase in number of fires ignited, number of acres burned, and number of structures destroyed (CAL FIRE 2016, 2018a). Since 2015, the average annual cost of fire suppression in California in areas under state jurisdiction has averaged over $550 million per year (CAL FIRE 2018b).

The District includes properties (educational facilities, administrative sites, and vacant parcels) spread throughout the City of San Diego.[1] The city is susceptible to wildfires due to the presence of open space and canyons, as well as its location adjacent to fire prone areas of San Diego County. The city contains over 900 linear miles of wildland-urban interface (WUI), which are areas where established development meets open space areas and canyons within urban and suburban areas. The San Diego region's climate, severe dry periods, vegetative fuel composition, and steep and varied terrain make it susceptible to both wildland and urban fires. The shrub-dominated plant communities occurring throughout the region are highly flammable. Adaptations to the local dry, Mediterranean climate include specialized roots, stems, and leaves. The latter two become available fuels of importance and contribute to wildfire intensity and spread. Santa Ana winds bring hot, dry desert air from the east into the region during late summer and fall, which increases wildland fire hazards during these seasons. Dry vegetation, low humidity, and high air temperature can combine to produce large-scale fire events. As Santa Ana winds blow westward toward denser development, fires driven by these winds have the potential to result in a greater risk of property damage (City of San Diego 2018).

In 2003 and 2007, the city experienced two major Santa Ana wind-driven wildland fires. The 2003 Cedar Fire burned approximately 280,278 acres across San Diego County, of which approximately 28,676 acres were within the city. The Cedar Fire destroyed 335 structures in the Scripps Miramar Ranch and Tierrasanta communities. The 2007 Witch Creek-Guejito Fires burned more than 197,990 acres countywide, of which 9,250 acres were within the city. The Witch Creek-Guejito Fires destroyed 365 structures in the Rancho Bernardo community (City of San Diego 2018).

Development patterns contribute to wildfire risk in California as well. When communities are in areas that burn frequently, wildfire smoke, which can travel for miles, has a negative effect on human health (Black et al. 2017). In addition, more wildfires are started near developed areas and roadways (Syphard 2007), and as development expands into wildland areas, more wildfires are ignited (Radeloff 2018). An estimated 80% of wildfires are ignited by humans (Balch et al. 2017).

## 4.16.2.2 Fire Hazard Designations

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas of significant fire hazards in the city through its Fire and Resource Assessment Program. These maps designate areas of the state into different fire hazard severity zones (FHSZ) based on various factors,

[1] As discussed further in Chapter 2, *Environmental Setting*, the District's jurisdiction also includes small portions of the cities of La Mesa and Lemon Grove, as well as unincorporated San Diego County. However, all existing District facilities are within the boundaries of the City of San Diego.

including vegetation, topography, weather, crown fire production, and ember production and movement (CAL FIRE 2007). CAL FIRE uses FHSZs to classify anticipated fire-related hazards for the entire state and includes classifications for Federal Responsibility Areas (FRAs), State Responsibility Areas (SRAs), and Local Responsibility Areas (LRAs).

A large portion of the city, even in highly developed areas, is designated as a Very High FHSZ (City of San Diego 2018). The District encompasses approximately 208 square miles within the city, and therefore several schools within the District are located within or adjacent to areas designated as Very High FHSZs. Figures 4.16-1 through 4.16-18 depict the locations of Very High FHSZs throughout the District and within each cluster.

## Federal Responsibility Areas

FRAs are fire-prone wildland areas that are owned or managed by a federal agency such as the U.S. Forest Service, National Park Service, Bureau of Land Management, U.S. Fish and Wildlife Service, or U.S. Department of Defense. Primary financial and rule-making jurisdictional authority rests with the federal land agency. In many instances, FRAs are interspersed with private land ownership or leases. Fire protection for developed private property is usually not the responsibility of the federal land management agency; structural protection responsibility is that of a local government agency.

Federally owned land within the city identified as FRAs includes the Miramar Naval Air Station, Naval Base Point Loma, Naval Base San Diego, and the United States Marine Corps Recruit Depot San Diego. There are three clusters, Madison Cluster, Scripps Ranch Cluster, and the Unassigned Cluster, that have lands designated as FRAs within their boundaries; however, there are no school sites within FRAs in these clusters (see Figures 4-16-1 through 4-16-18).

## State Responsibility Areas

California PRC Sections 4201-4204 directs CAL FIRE to map fire hazards within SRAs, based on relevant factors such as fuels, terrain, and weather. SRAs are lands in California where CAL FIRE has legal and financial responsibility for wildfire protection and where CAL FIRE administers fire hazard classifications and building standard regulations. SRAs are defined as lands that meet the following criteria:

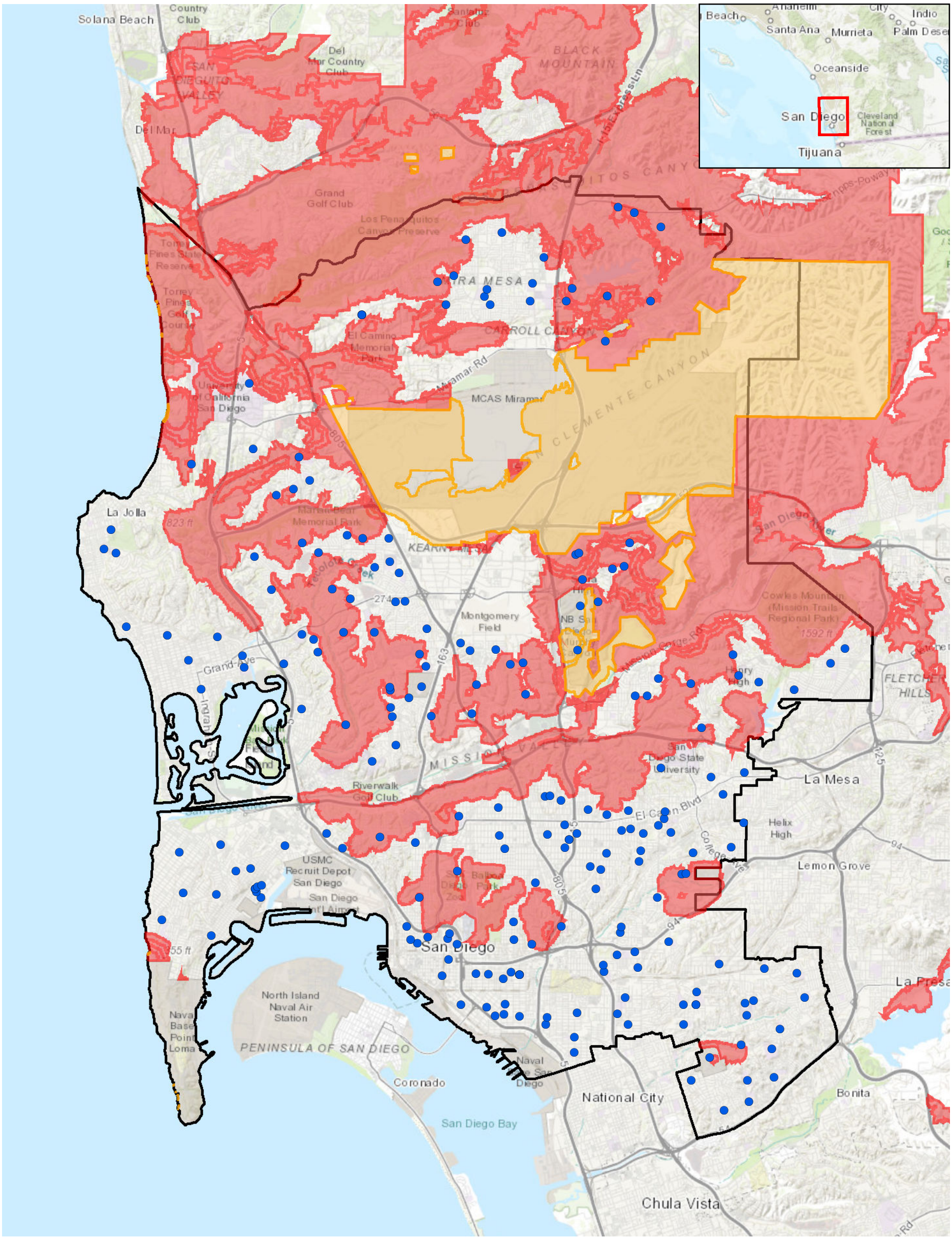
- Are county unincorporated areas.
- Are not federally owned.
- Have wildland vegetation cover rather than agricultural or ornamental plants.
- Have watershed or range/forage value.
- Have housing densities not exceeding three units per acre.

Where SRAs contain built environment or development, the responsibility for fire protection of those improvements (non-wildland) is that of a local government agency.

These statutes (i.e., PRC Sections 4201-4204) were passed after significant WUI fires; consequently, these hazards are described according to their potential for causing ignitions to buildings. These FHSZs provide the basis for application of various mitigation strategies to reduce risks to buildings associated with wildland fires. The zones also relate to the requirements for building codes designed to reduce the ignition potential to buildings in the WUI zones. There are no SRAs within the clusters (ArcGIS 2017).

## Local Responsibility Areas

California PRC Sections 4201–4204 and Government Code Section 51175-89 direct CAL FIRE to identify areas of Very High FHSZ within LRAs. LRAs include land in cities, cultivated agriculture lands, non-flammable areas in unincorporated areas, and lands that do not meet the criteria for designation as an SRA or FRA. LRA fire protection is typically provided by city fire departments, fire protection districts, and counties, or by CAL FIRE under contract to local governments. LRAs may include flammable vegetation and WUI areas where the financial and jurisdictional responsibility for improvement and wildfire protection is that of a local government agency. A total of 17 clusters have LRAs within their boundaries, 13 of which have school sites located within LRAs. See Table 4.16-2 for the list of school sites within LRAs and that contain areas designated as a Very High FHSZ.




Source: CalFire (2017); Imagery-ESRI Street Map (2018)

ICF

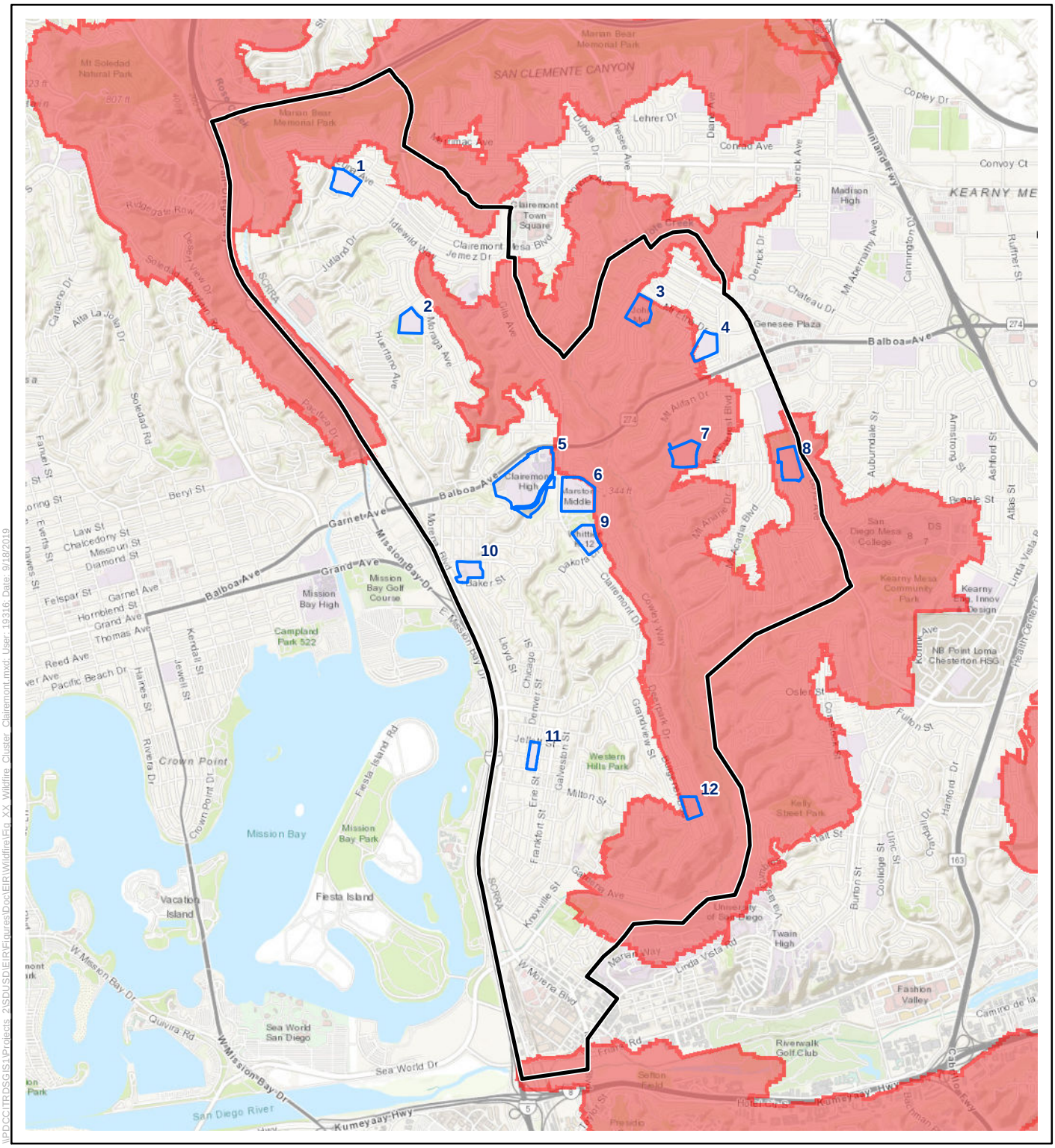
N

0 1 2 Miles

**Figure 4.16-1**
**Entire District Fire Hazard Severity Zones**

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Cluster Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

School Boundary

Schools

1 - Alcott Elementary
2 - Cadman Elementary
3 - John Muir
4 - Mt. Everest Academy
5 - Clairemont High
6 - Marston Middle
7 - Holmes Elementary
8 - Riley/New Dawn
9 - Whittier K-12
10 - Toler Elementary
11 - Bay Park Elementary
12 - Longfellow K-8




ICF

N

0 0.5 1 Miles

Source: ESRI; GreenInfo (2019); CalFire (2019)

**Figure 4.16-2**
**Fire Hazard Severity Zones within Clairemont Cluster**

\\PROJECTS\SDUSD\EIR\Figures\Rpts\EIR\Wildfire\Fig_XX_Wildfire_Cluster_Clairemont.mxd User: 19316 Date: 9/19/2019

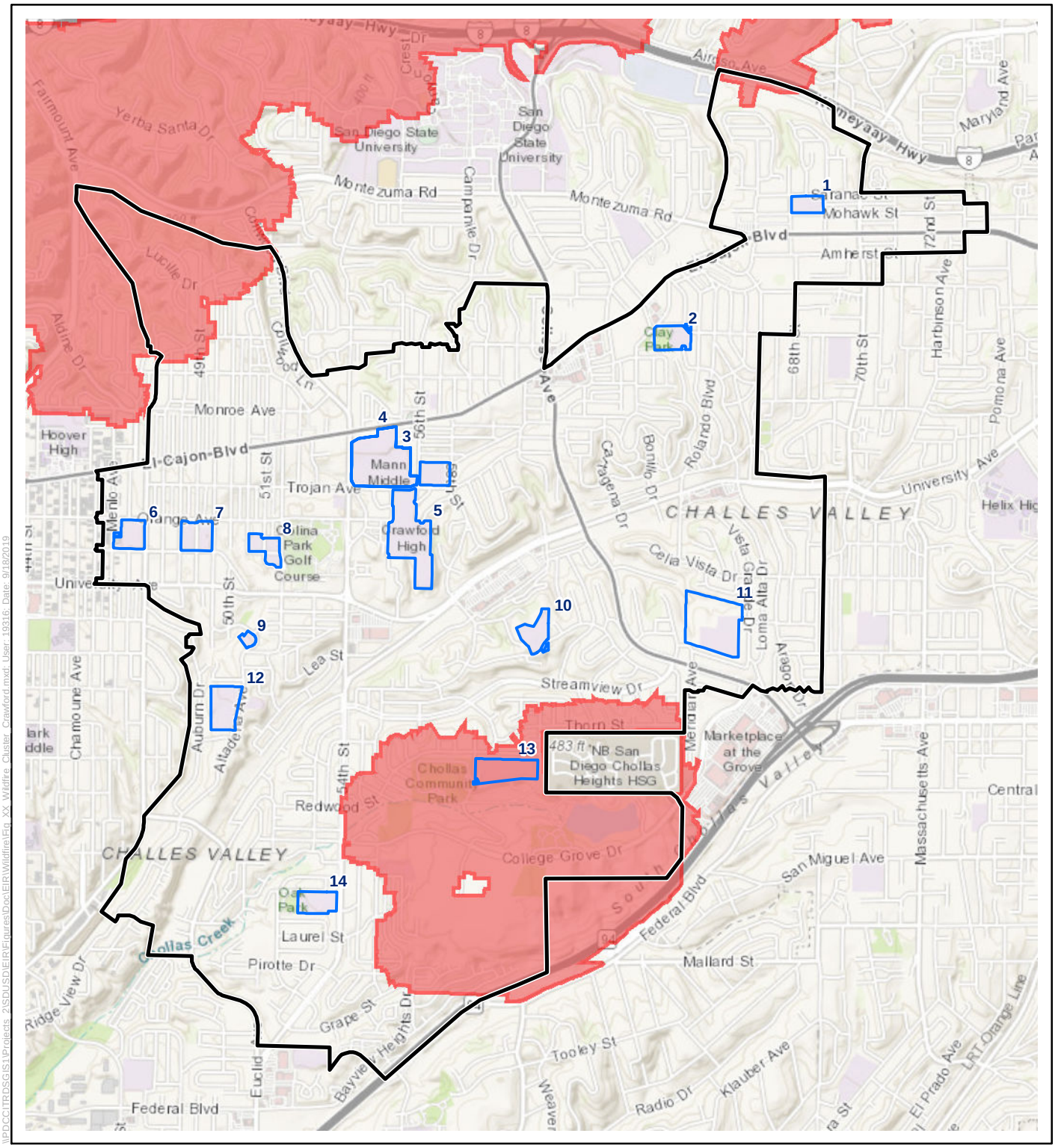



**Figure 4.16-3**
**Fire Hazard Severity Zones within Crawford Cluster**

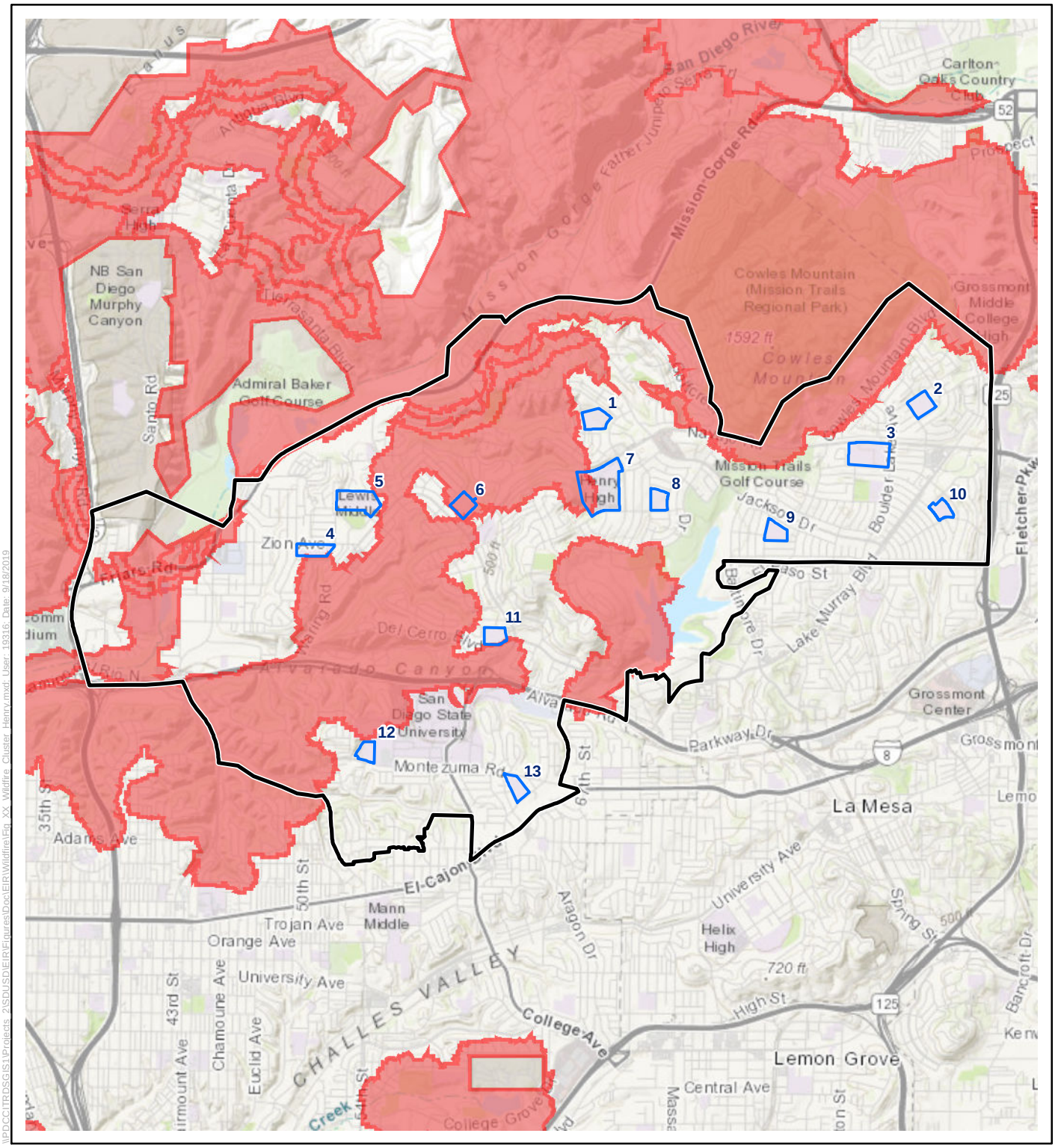
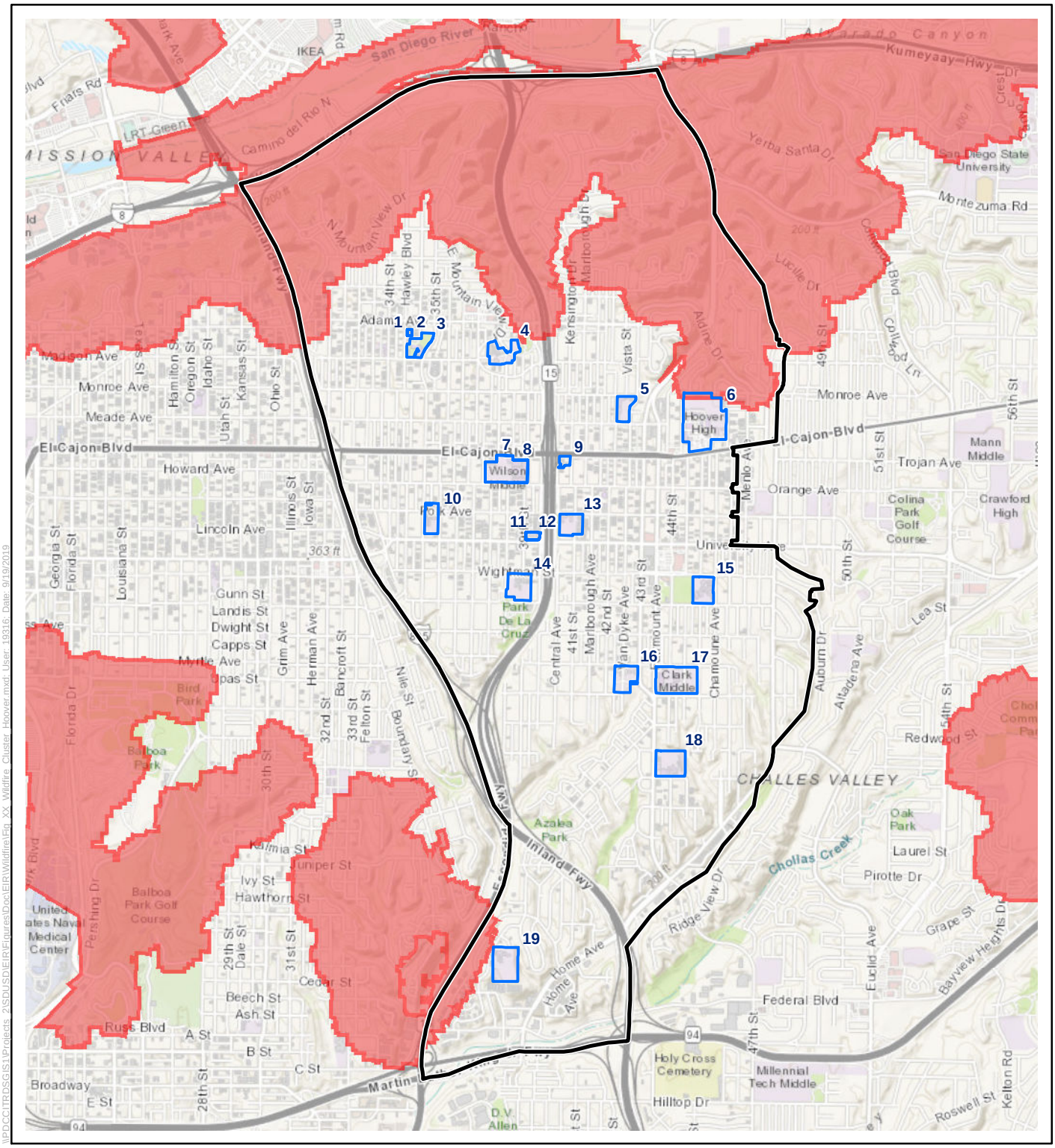



**Figure 4.16-4**
**Fire Hazard Severity Zones within Henry Cluster**




Cluster Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

School Boundary

Schools

1 - San Diego Global Vision Academy Middle
2 - San Diego Global Vision Academy
3 - Adams Elementary
4 - Normal Heights Elementary
5 - Franklin Elementary
6 - Hoover High
7 - Wilson Middle
8 - Arroyo Paseo Charter High
9 - America's Finest Charter
10 - Edison Elementary
11 - Health Sciences High
12 - Health Sciences Middle
13 - Central Elementary
14 - Cherokee Point Elementary
15 - Rosa Parks Elementary
16 - Joyner Elementary
17 - Clark Middle
18 - Hamilton Elementary
19 - Rowan Elementary

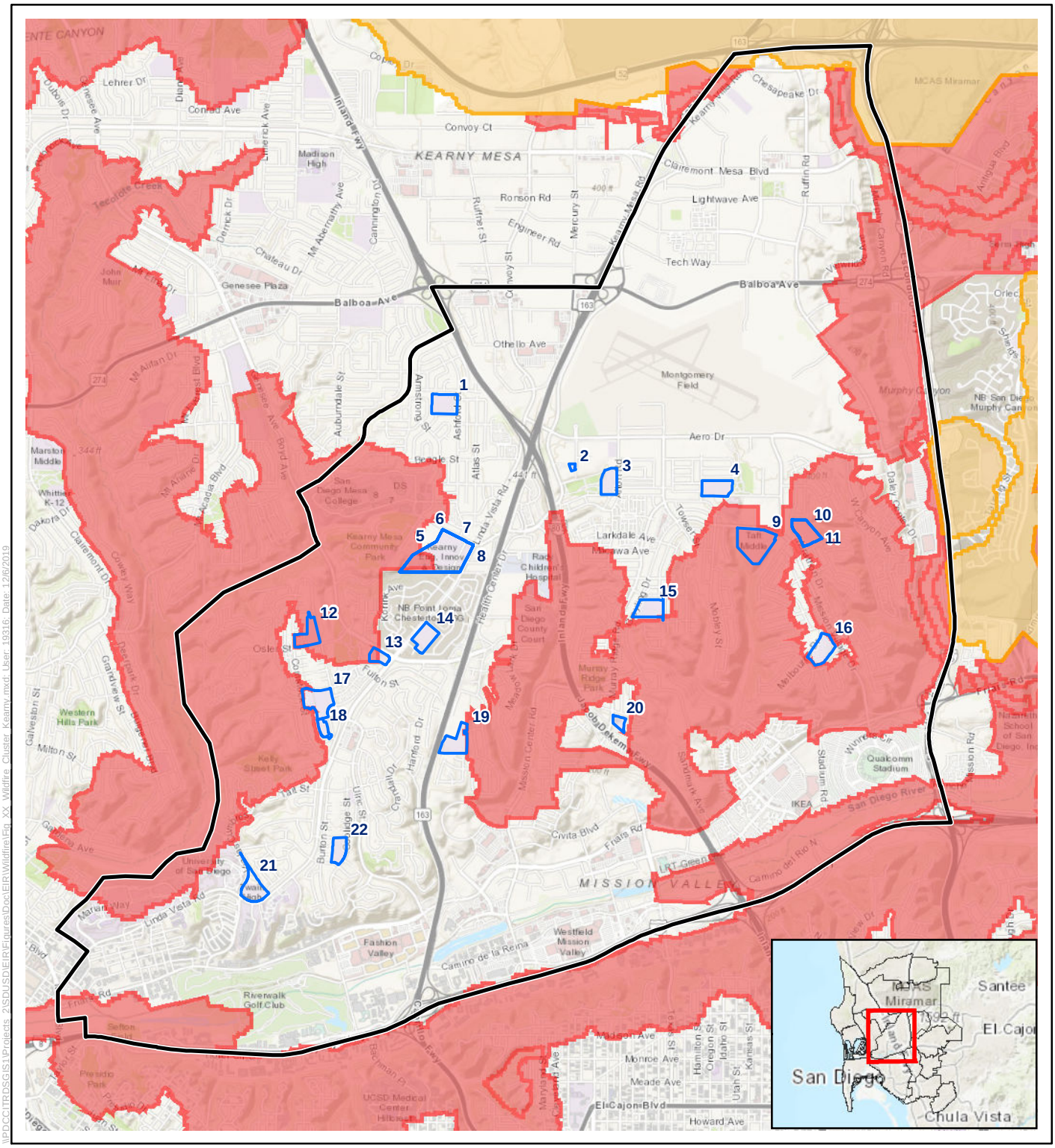
0 0.5 1 Miles

N

Source: ESRI; GreenInfo (2019); CalFire (2019)

**Figure 4.16-5**
**Fire Hazard Severity Zones within Hoover Cluster**

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Cluster Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

Federal Responsibility Area

Very High Fire Hazard Severity Zone

School Boundary

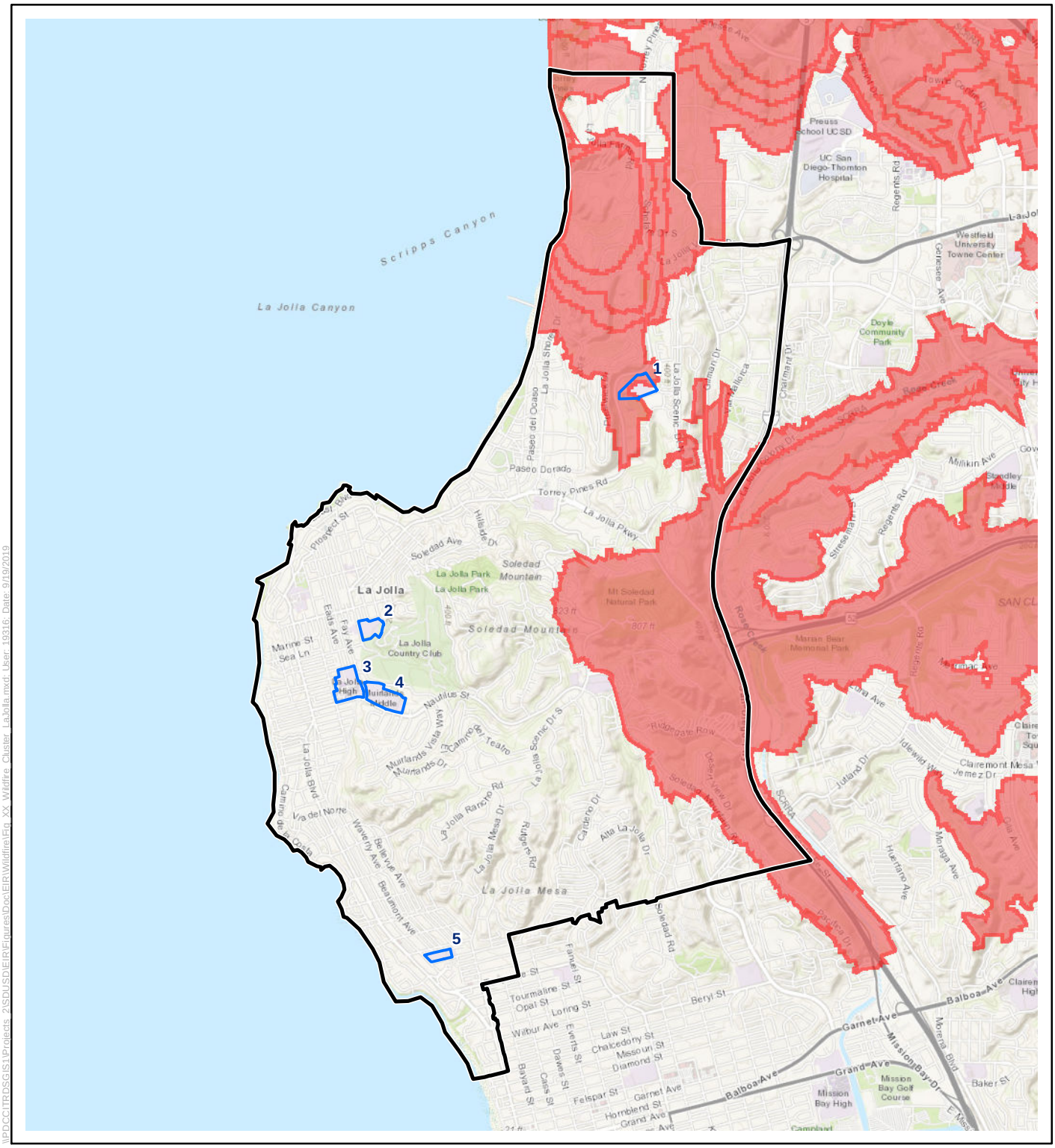
Schools

1 - Ross Elementary
2 - Coleman Tech Charter High
3 - Angier Elementary
4 - Wegeforth Elementary
5 - Kearny Construction Tech
6 - Kearny International Business
7 - Kearny SCT
8 - Kearny Digital Media & Design
9 - Taft Middle
10 - Cubberley Elementary
11 - Kavod Elementary Charter
12 - Linda Vista Elementary
13 - San Diego Cooperative Charter
14 - Chesterton Elementary
15 - Jones Elementary
16 - Juarez Elementary
17 - Montgomery Middle
18 - Empower Charter
19 - Fletcher Elementary
20 - Elevate Elementary
21 - Twain High
22 - Carson Elementary

0 0.5 1 Miles

Source: ESRI; GreenInfo (2019); CalFire (2019)

**Figure 4.16-6**
**Fire Hazard Severity Zones within Kearny Cluster**




Cluster Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

School Boundary

Schools

1 - Torrey Pines Elementary
2 - La Jolla Elementary
3 - La Jolla High
4 - Muirlands Middle
5 - Bird Rock Elementary



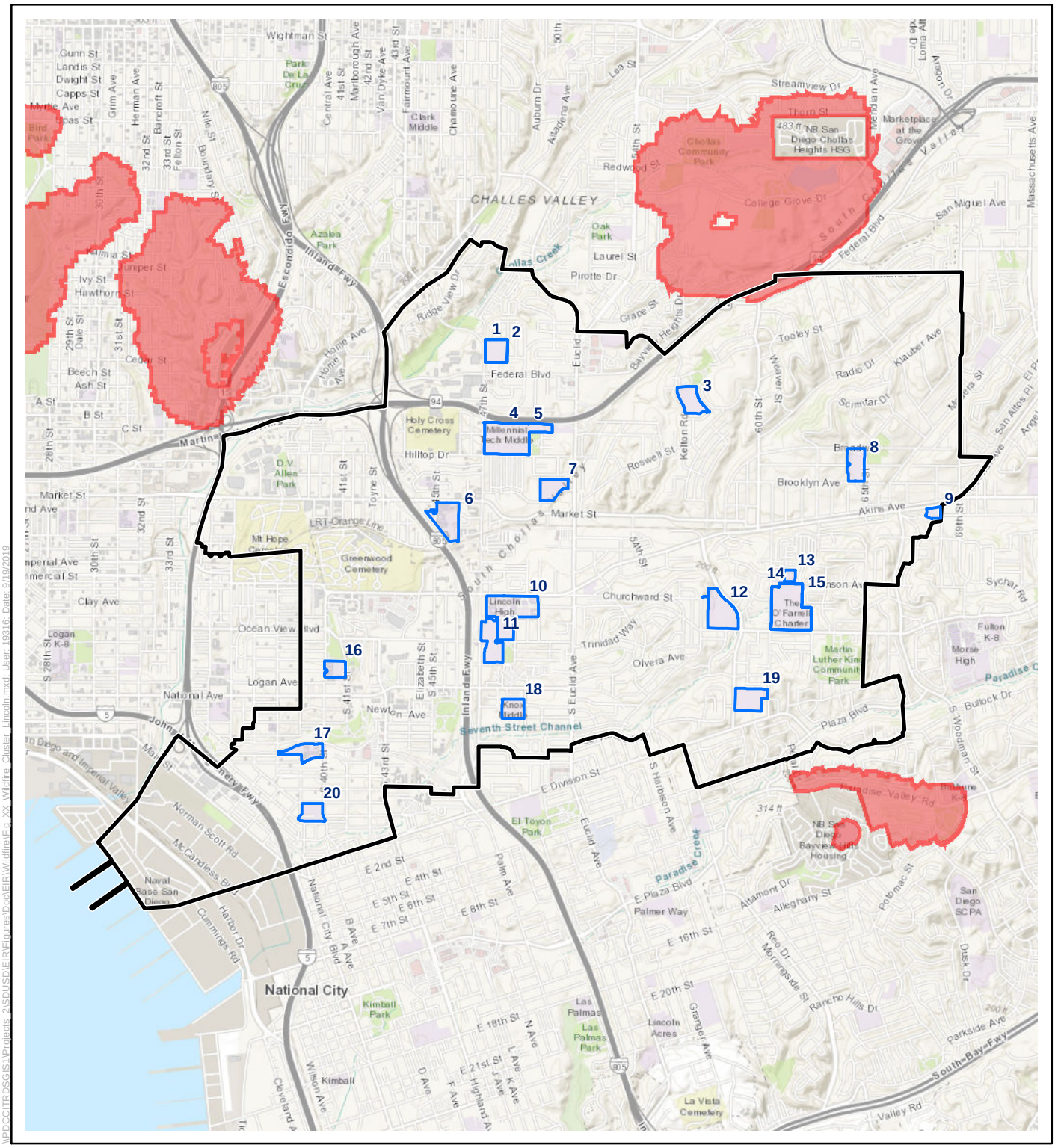

0 0.5 1 Miles

N

**Figure 4.16-7**
**Fire Hazard Severity Zones within La Jolla Cluster**

Source: ESRI; GreenInfo (2019); CalFire (2019)

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Cluster Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

School Boundary

Schools

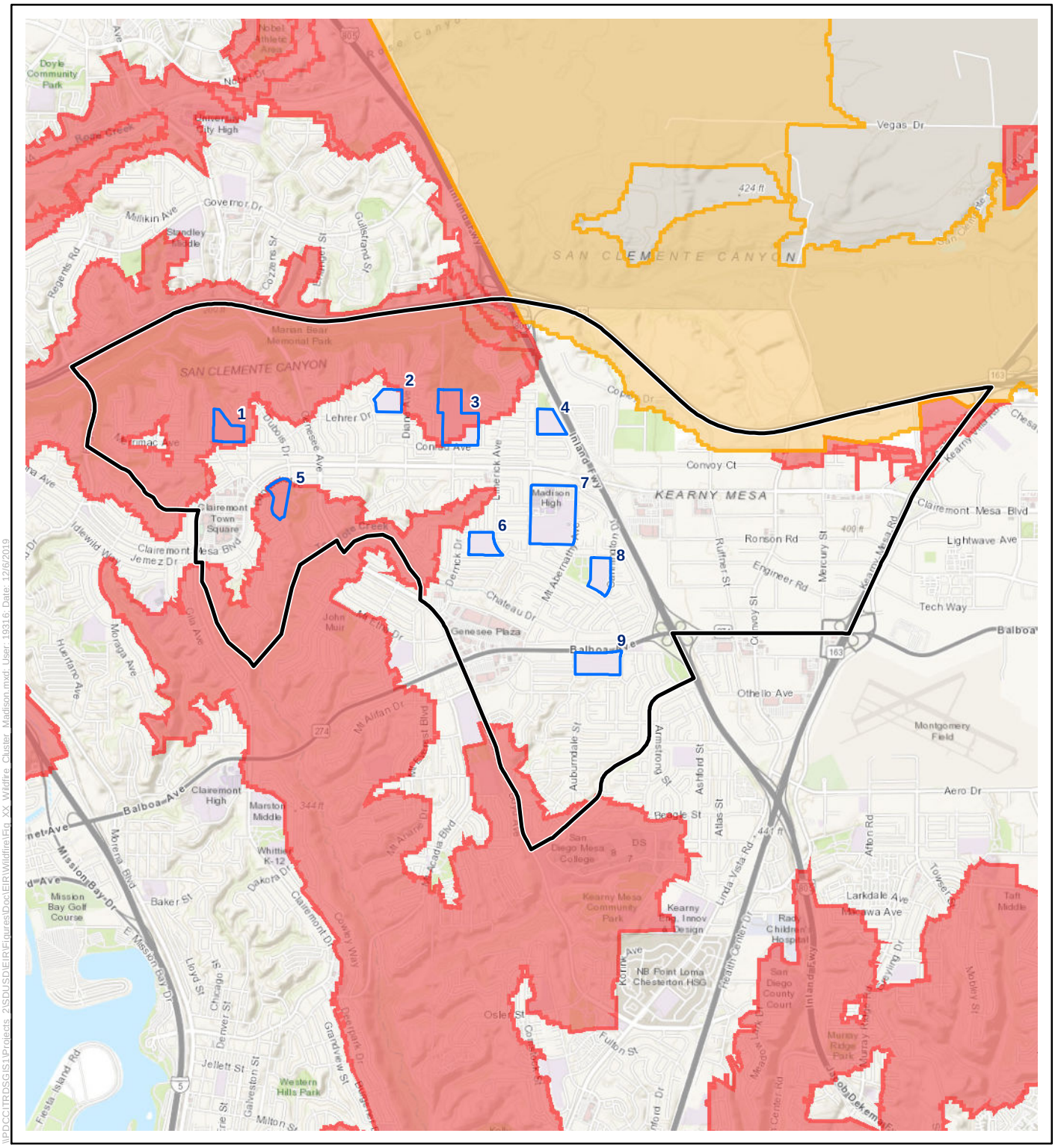
1 - Holly Drive Leadership Academy
2 - Webster Elementary
3 - Johnson Elementary
4 - Gompers Preparatory Academy
5 - Millennial Tech Middle
6 - Chollas/Mead Elementary
7 - Horton Elementary
8 - Encanto Elementary
9 - Evangeline Roberts Institute of Learning
10 - Lincoln High
11 - Porter Elementary
12 - Valencia Park Elementary
13 - Epiphany Prep Charter
14 - Ingenuity Charter
15 - The O'Farrell Charter
16 - Baker Elementary
17 - Chavez Elementary
18 - Knox Middle
19 - Nye Elementary
20 - Balboa Elementary

0 0.5 1 Miles

N

Source: ESRI; GreenInfo (2019); CalFire (2019)

**Figure 4.16-8**
**Fire Hazard Severity Zones within Lincoln Cluster**




Cluster Boundary

School Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

Federal Responsibility Area

Very High Fire Hazard Severity Zone

Schools

1 - Whitman Elementary

2 - Hawthorne Elementary

3 - Creative, Performing, and Media Arts

4 - Innovation Middle

5 - Field Elementary

6 - Sequoia Elementary

7 - Madison High

8 - Lafayette Elementary

9 - Lindbergh/Schweitzer Elementary



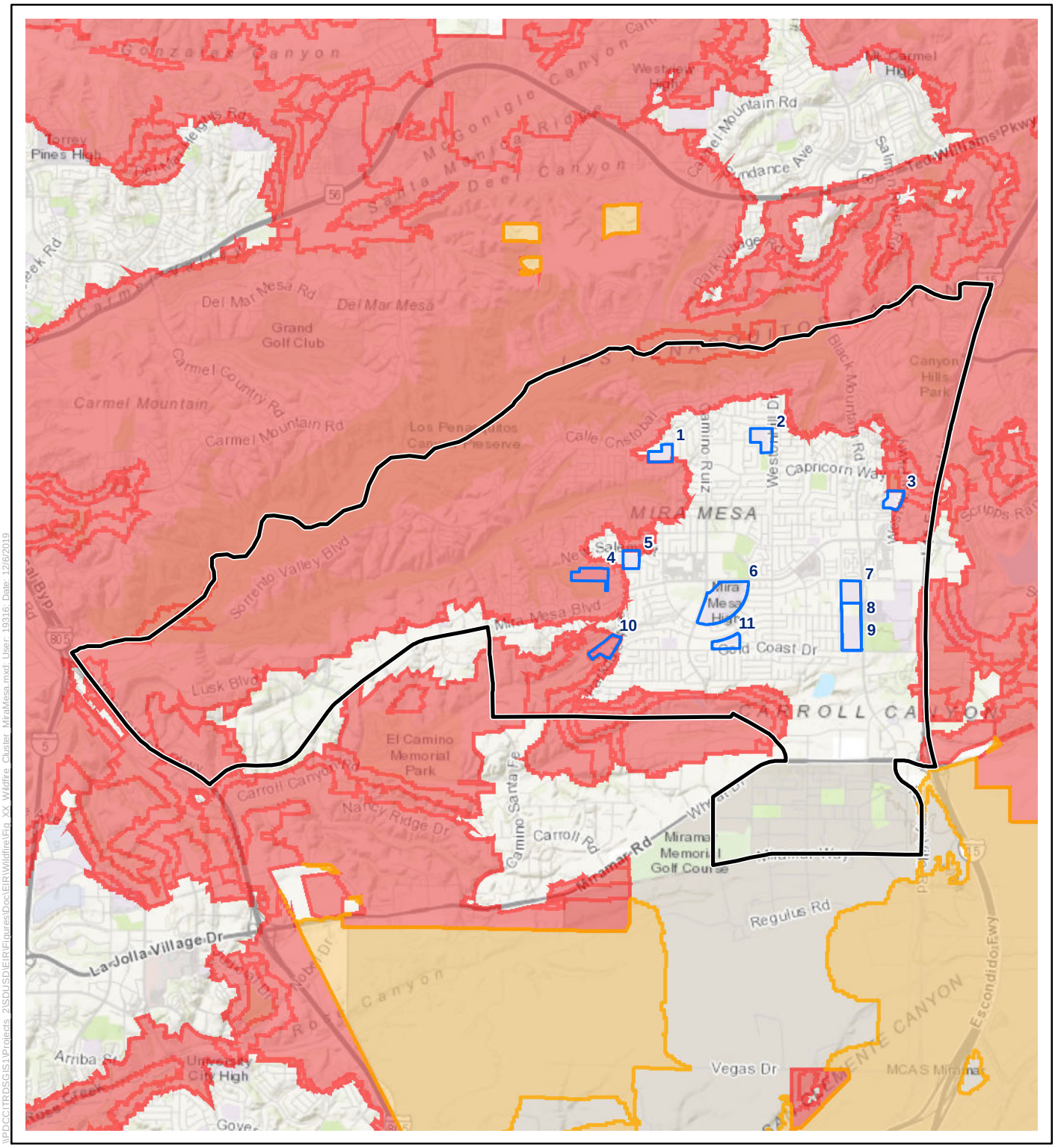

0 0.5 1 Miles

N

**Figure 4.16-9**
**Fire Hazard Severity Zones within Madison Cluster**

Source: ESRI; GreenInfo (2019); CalFire (2019)

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Cluster Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

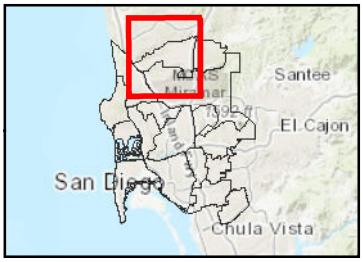
Federal Responsibility Area

Very High Fire Hazard Severity Zone

School Boundary

Schools

1 - Sandburg Elementary
2 - Ericson Elementary
3 - Hage Elementary
4 - Challenger Middle
5 - Hickman Elementary
6 - Mira Mesa High
7 - Walker Elementary
8 - TRACE
9 - Wangenheim Middle
10 - Jonas Salk Elementary
11 - Mason Elementary

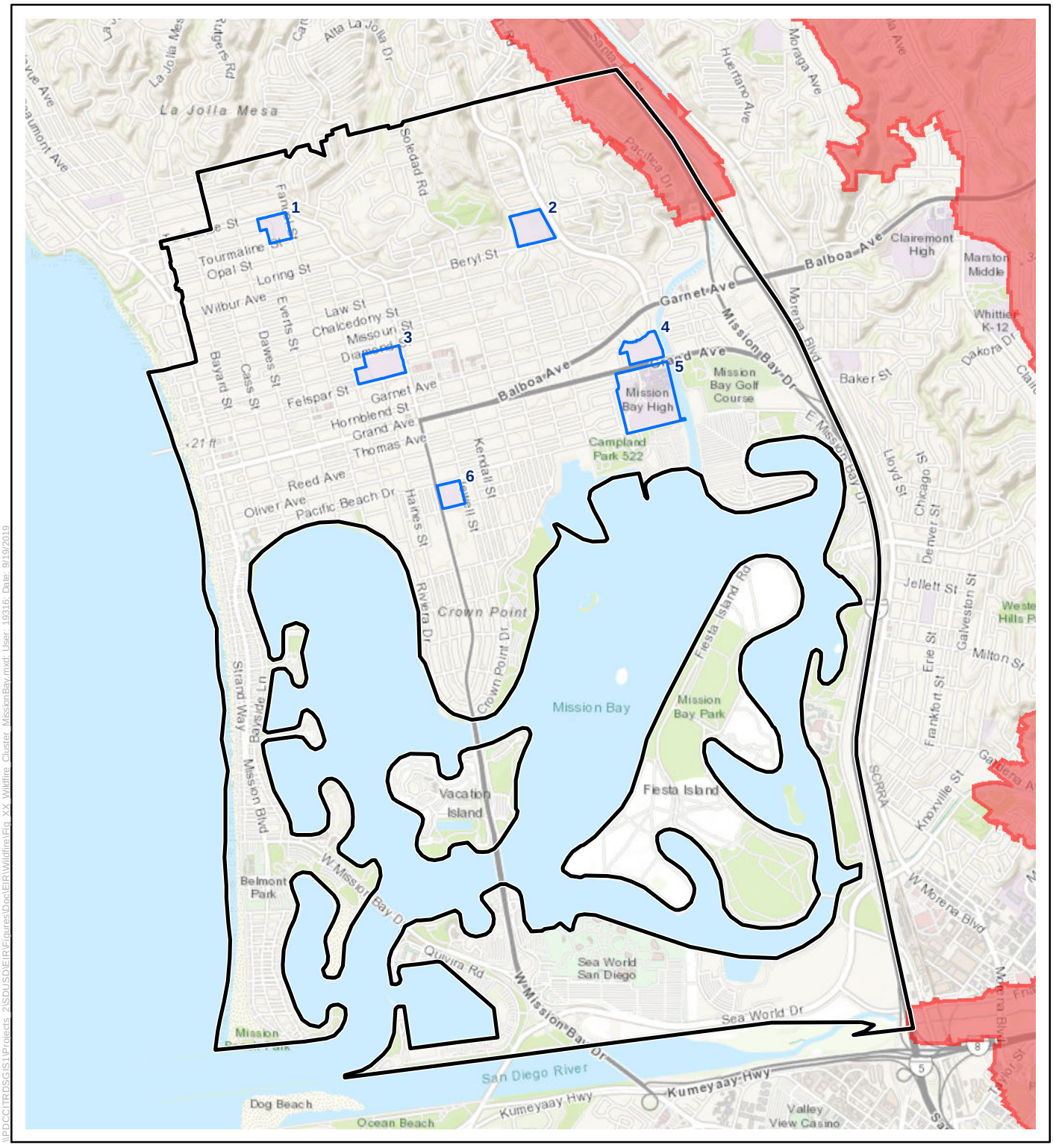



0 0.5 1 Miles

N

Source: ESRI; GreenInfo (2019); CalFire (2019)

**Figure 4.16-10**
**Fire Hazard Severity Zones within Mira Mesa Cluster**




Cluster Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

School Boundary

Schools

1 - Pacific Beach Elementary
2 - Sessions Elementary
3 - Pacific Beach Middle
4 - Barnard Elementary
5 - Mission Bay High
6 - Crown Point Elementary



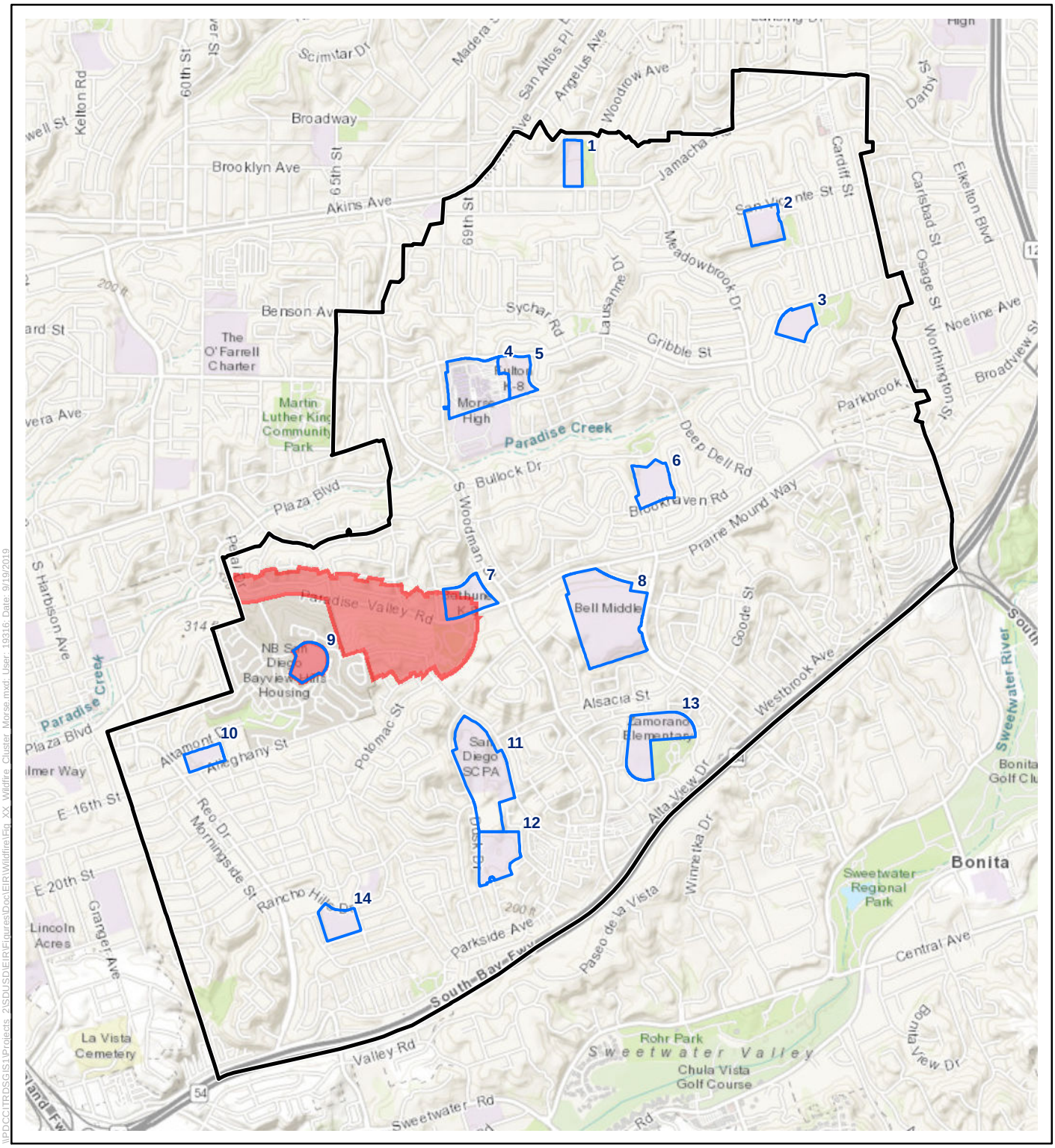

0 0.25 0.5 Miles

N

**Figure 4.16-11**
**Fire Hazard Severity Zones within Mission Bay Cluster**

Source: ESRI; GreenInfo (2019); CalFire (2019)

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Cluster Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

School Boundary

Schools

1 - Keiller Leadership Academy
2 - Audubon K-8
3 - Freese Elementary
4 - Morse High
5 - Fulton K-8
6 - Boone Elementary
7 - Bethune K-8
8 - Bell Middle
9 - Perry Elementary
10 - Paradise Hills Elementary
11 - San Diego SCPA
12 - Penn Elementary
13 - Zamorano Elementary
14 - Lee Elementary



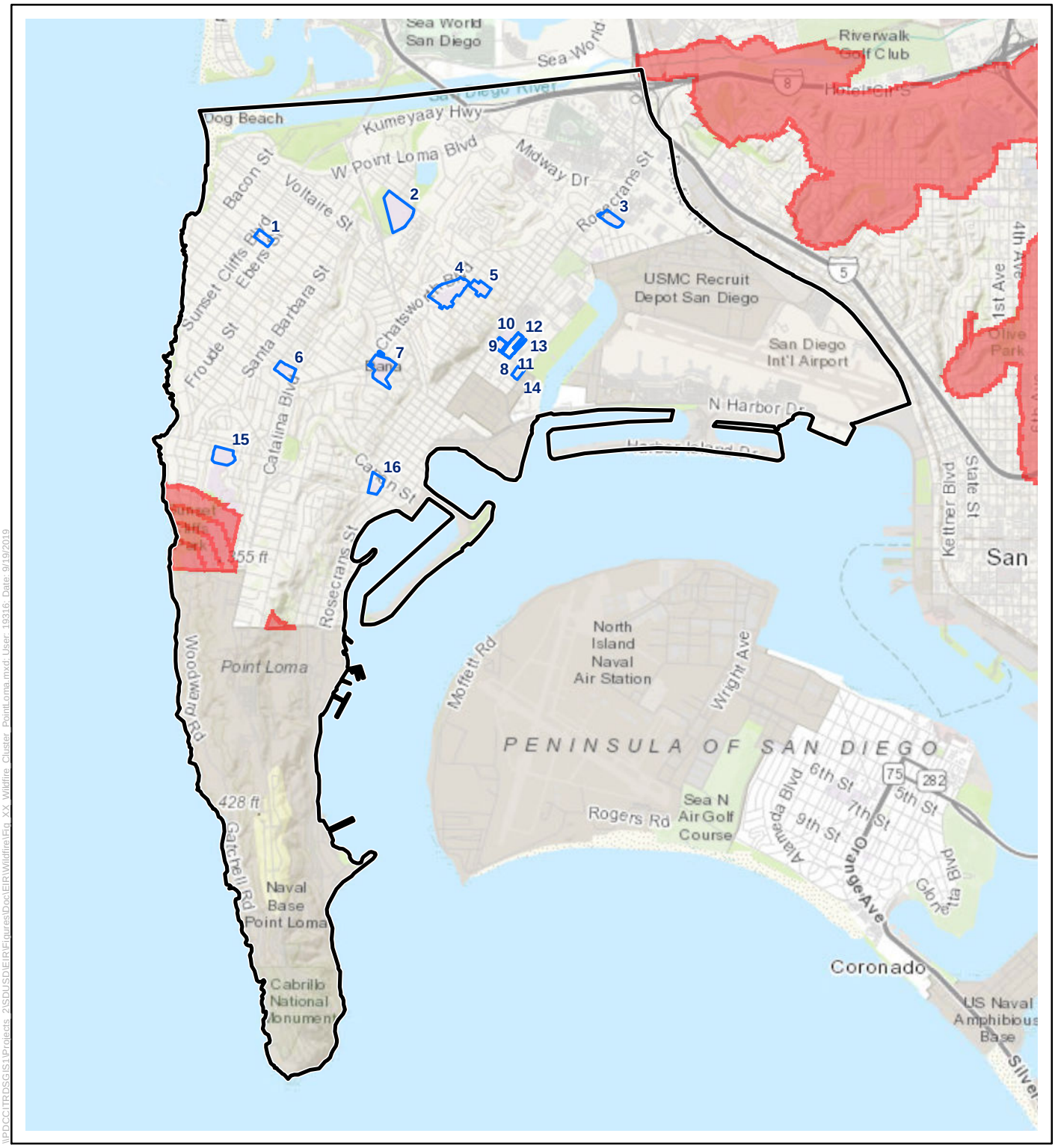

0 0.25 0.5 Miles

N

Source: ESRI; GreenInfo (2019); CalFire (2019)

**Figure 4.16-12**
**Fire Hazard Severity Zones within Morse Cluster**

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Cluster Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

School Boundary

Schools

1 - Alcott Elementary
2 - Cadman Elementary
3 - John Muir
4 - Mt. Everest Academy
5 - Clairemont High
6 - Marston Middle
7 - Holmes Elementary
8 - Riley/New Dawn
9 - Whittier K-12
10 - Toler Elementary
11 - Bay Park Elementary
12 - Longfellow K-8



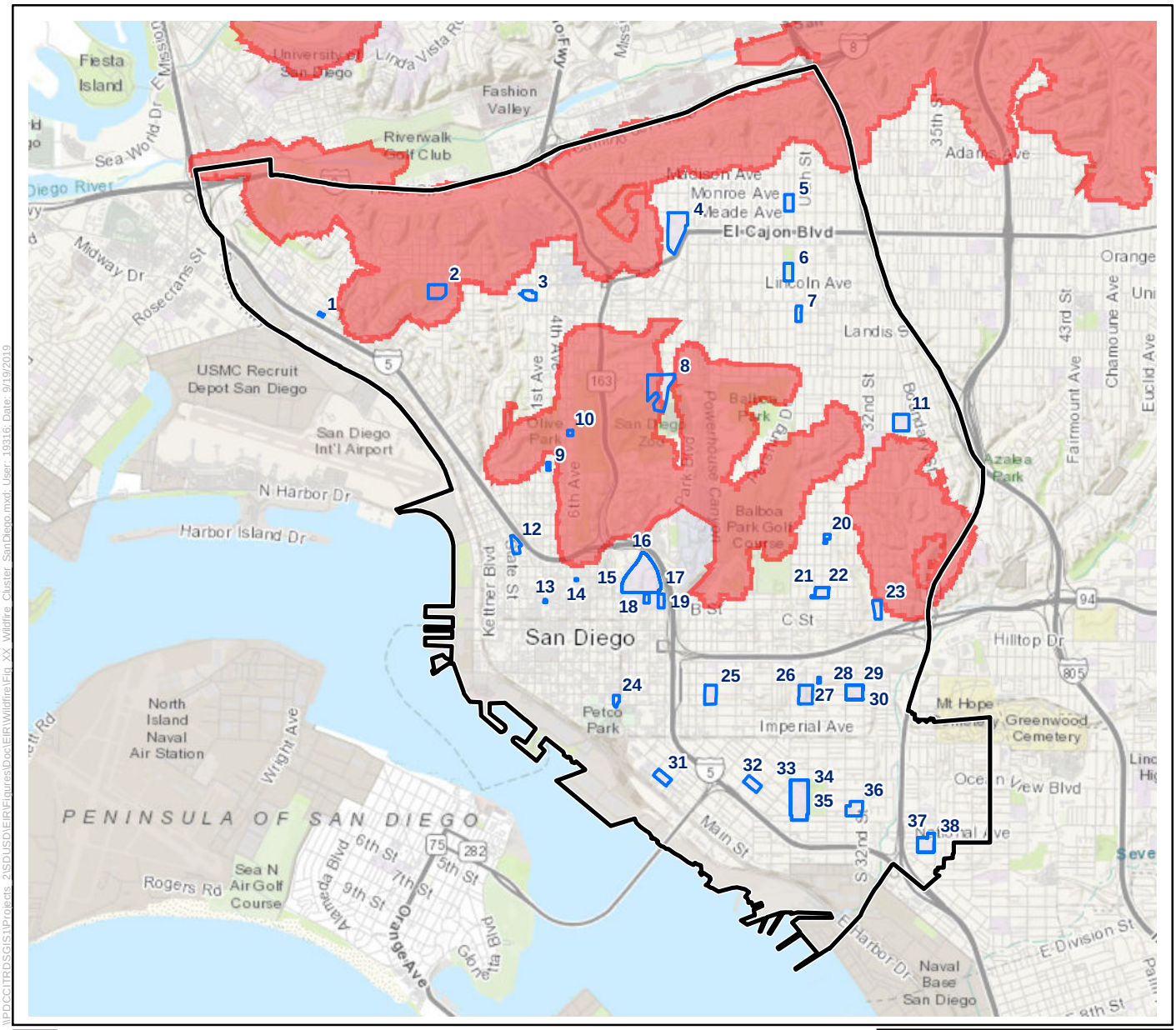

0 0.5 1 Miles

N

**Figure 4.16-13**
**Fire Hazard Severity Zones within Point Loma Cluster**

Source: ESRI; GreenInfo (2019); CalFire (2019)

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Cluster Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

School Boundary

Schools

1 - Old Town Academy K-8 Charter
2 - Grant K-8
3 - Florence Elementary
4 - Birney Elementary
5 - Garfield Elementary
6 - ALBA
7 - Jefferson Elementary
8 - Roosevelt International Middle
9 - Museum
10 - Urban Discovery Academy Charter
11 - McKinley Elementary
12 - Washington Elementary
13 - King-Chavez Community High
14 - KIPP Adelante Preparatory Academy
15 - San Diego Science and Technology
16 - San Diego International Studies
17 - San Diego Business
18 - San Diego Early/Middle College
19 - Garfield High
20 - McGill School of Success
21 - Einstein Academy
22 - Albert Einstein Academy Charter Middle
23 - Golden Hill K-8
24 - e3 Civic High
25 - Sherman Elementary
26 - Kimbrough Elementary
27 - King-Chavez Preparatory Academy
28 - King-Chavez Athletics Academy
29 - King-Chavez Primary Academy
30 - King-Chavez Arts Academy
31 - Perkins K-8
32 - Burbank Elementary
33 - King-Chavez Academy of Excellence
34 - Logan K-8
35 - Memorial Scholars & Athletes
36 - Rodriguez Elementary
37 - San Diego Cooperative Charter School 2
38 - Emerson/Bandini Elementary

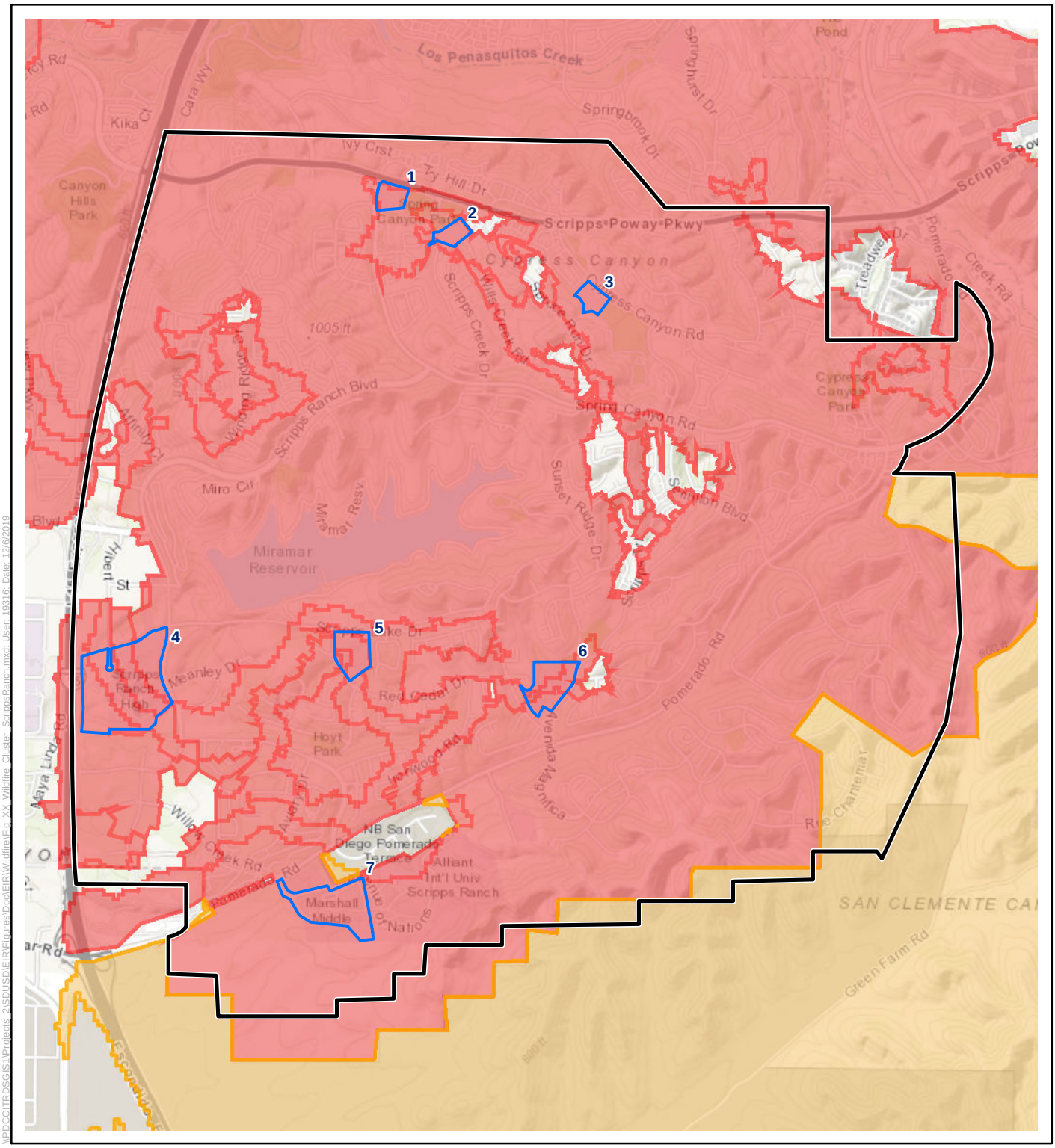
0 0.5 1 Miles

N

**Figure 4.16-14**
**Fire Hazard Severity Zones within San Diego Cluster**

Source: ESRI; GreenInfo (2019); CalFire (2019)

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Cluster Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

Federal Responsibility Area

Very High Fire Hazard Severity Zone

School Boundary

Schools

1 - Innovations Academy

2 - Dingeman Elementary

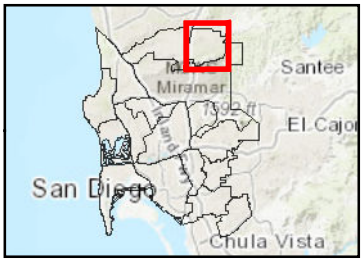
3 - Scripps Elementary

4 - Scripps Ranch High

5 - Miramar Ranch Elementary

6 - Jerabek Elementary

7 - Marshall Middle



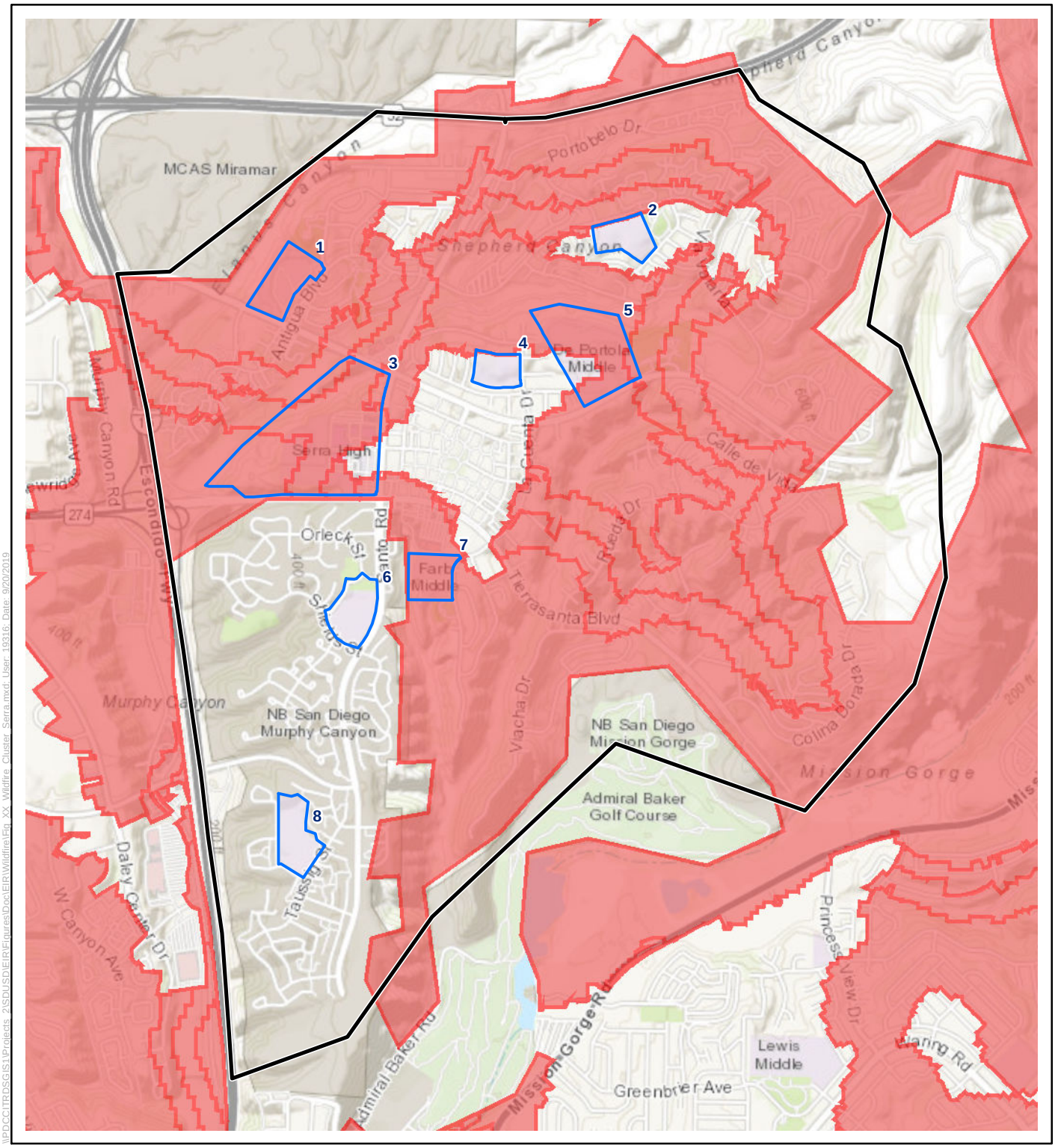

0 0.25 0.5 Miles

N

**Figure 4.16-15**
**Fire Hazard Severity Zones within Scripps Ranch Cluster**

Source: ESRI; GreenInfo (2019); CalFire (2019)

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Cluster Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

School Boundary

Schools

1 - Vista Grande Elementary
2 - Kumeyaay Elementary
3 - Serra High
4 - Tierrasanta Elementary
5 - De Portola Middle
6 - Miller Elementary
7 - Farb Middle
8 - Hancock Elementary

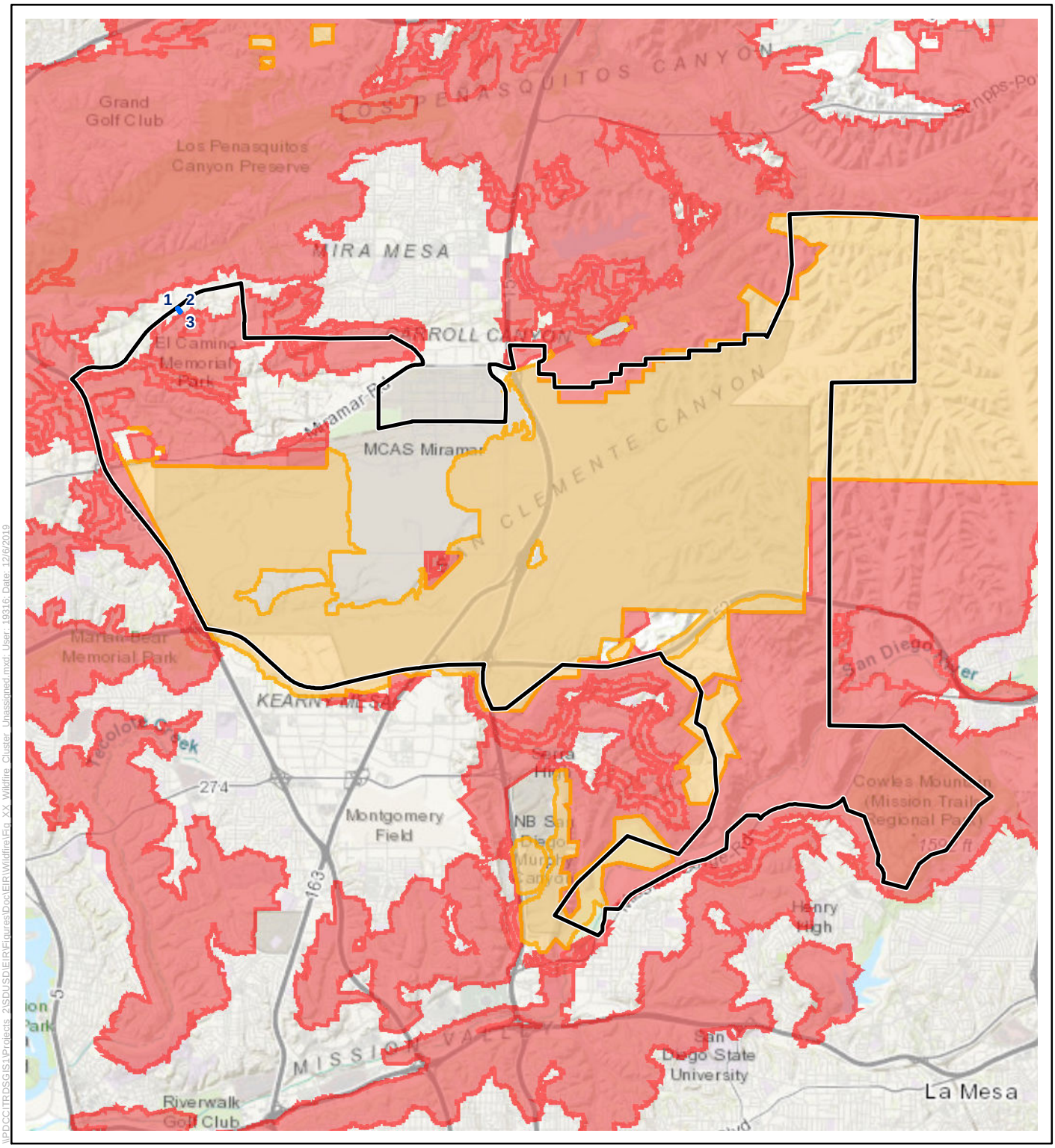



0 0.25 0.5 Miles

N

Source: ESRI; GreenInfo (2019); CalFire (2019)

**Figure 4.16-16**
**Fire Hazard Severity Zones within Serra Cluster**




Cluster Boundary

School Boundary

Local Responsibility Area

Schools

Very High Fire Hazard Severity Zone

1 - Audeo Charter

2 - Charter School of San Diego

3 - Laurel Preparatory Academy

Federal Responsibility Area

Very High Fire Hazard Severity Zone



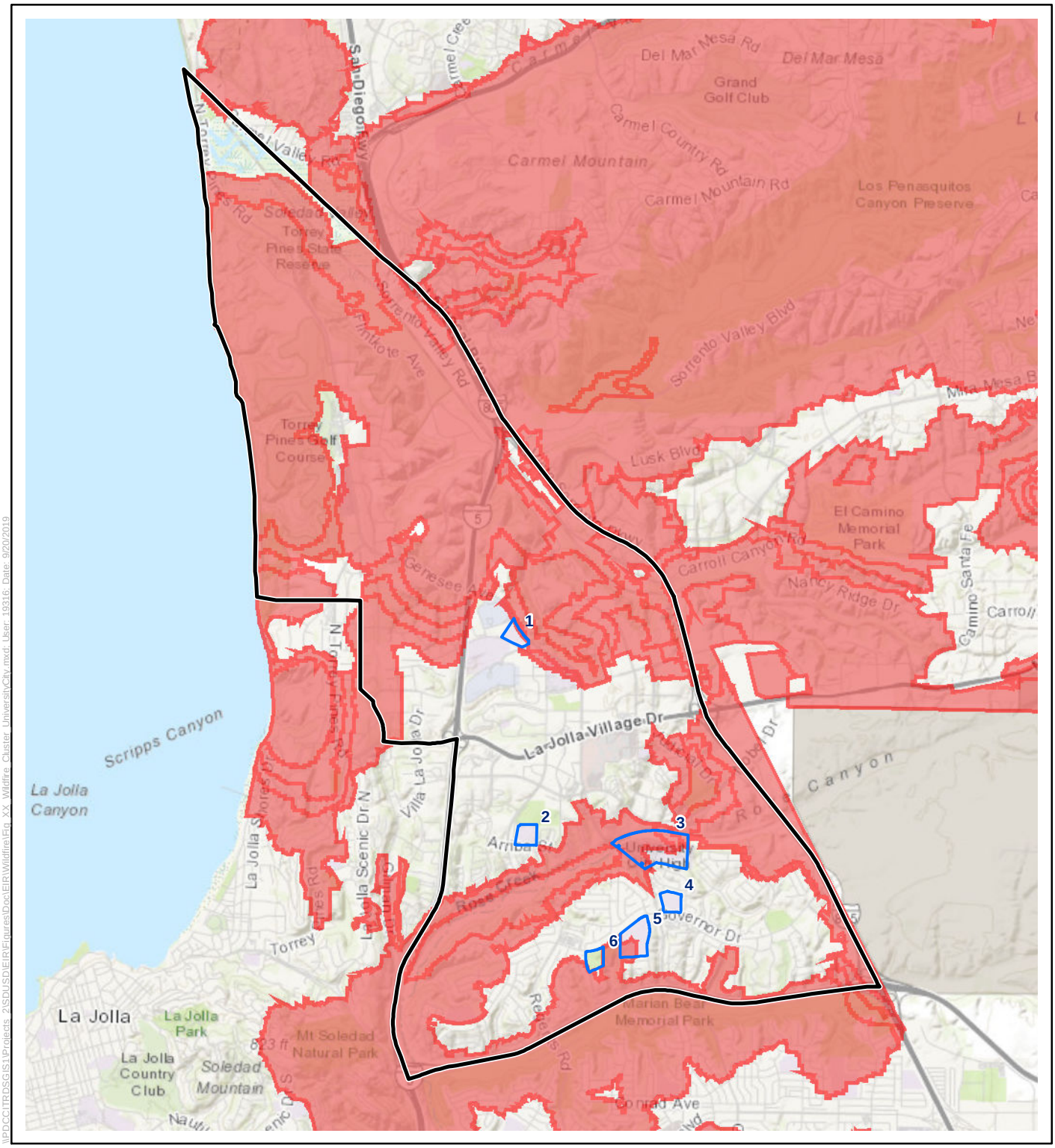

0 0.5 1 Miles

N

**Figure 4.16-17**
**Fire Hazard Severity Zones within Unassigned Cluster**

Source: ESRI; GreenInfo (2019); CalFire (2019)

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Cluster Boundary

Local Responsibility Area

Very High Fire Hazard Severity Zone

School Boundary

Cluster_No, School

1 - Preuss School UCSD
2 - Doyle Elementary
3 - University City High
4 - Curie Elementary
5 - Standley Middle
6 - Spreckels Elementary




0 0.5 1 Miles

N

**Figure 4.16-18**
**Fire Hazard Severity Zones within University City Cluster**

Source: ESRI; GreenInfo (2019); CalFire (2019)

\\PROGTRDSGIS1\Projects_2\SDUSD\EIR\Figures\Post\EIR\Wildfire\Fig_XX_Wildfire_Cluster_UniversityCity.mxd User: 10316 Date: 9/20/2019

### 4.16.2.3 Wildland Urban Interface

The WUI is an area where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels (USDA and USDOI 2001) and occur in areas designated by CAL FIRE as a FHSZ. Generally, the WUI includes a setting where development abuts wildland; the developed areas could have sparse to no wildland vegetation but are close to a large patch of wildland. Wildland "intermix" refers to the area where structures are scattered throughout the wildland area; thus, structures and wildland vegetation are directly intermingled (USDA 2019).

The WUI creates an environment in which fire can move readily between structural and vegetation fuels. Once homes are built within (or adjacent to) natural habitat settings, fighting wildland fires becomes more complex because the goal of extinguishing the wildland fire is often superseded by protecting human life and private property.

The WUI is composed of communities that border wildlands or are intermixed with wildlands and where the minimum density exceeds one structure per 40 acres. WUI communities are created when the following conditions occur: (1) structures are built at densities greater than one unit per 40 acres, (2) the percentage of native vegetation is less than 50%, (3) the area is more than 75% vegetated, and (4) the area is within 1.5 miles of an area greater than a census block (1,325 acres). The 1.5-mile buffer distance was adopted according to the 2001 California Fire Alliance definition of vicinity, which is roughly the distance that pieces of burning wood can be carried from wildland fire to the roof of a structure (UW 2008).

Based on the CAL FIRE Very High FHSZ maps for the District (Figures 4.16-1 through 4.16-18), 44 existing schools are within the Very High FHSZ, as identified in Table 4.16-2.

**Table 4.16-2. Existing Schools Within the Very High Fire Hazard Severity Zone**

| School Cluster | Schools Within Very High FHSZ |
|---|---|
| Clairemont Cluster | John Muir Language Academy |
| | Holmes Elementary |
| | Riley K–12 |
| | Longfellow K–8 |
| Crawford Cluster | Carver Elementary |
| Henry Cluster | Marvin Elementary |
| | Henry High |
| Hoover Cluster | Hoover High |
| Kearny Cluster | Kearny High School Complex |
| | Taft Middle |
| | Cubberley Elementary |
| | Kavod Elementary Charter |
| | Linda Vista Elementary |
| | San Diego Cooperative Charter |
| | Fletcher Elementary |
| La Jolla Cluster | Torrey Pines Elementary |

| School Cluster | Schools Within Very High FHSZ |
|---|---|
| Madison Cluster | Whitman Elementary |
| | Creative Performing & Media Arts Middle |
| | Field Elementary |
| Mira Mesa Cluster | Challenger Middle |
| | Jonas Salk Elementary |
| Morse Cluster | Bethune K–8 |
| | Perry Elementary |
| San Diego Cluster | Grant K–8 |
| | Roosevelt Middle |
| Scripps Ranch | Innovations Academy K–8 |
| | Dingeman Elementary |
| | E.B. Scripps Elementary |
| | Jerabek Elementary |
| | Miramar Ranch Elementary |
| | Marshall Middle |
| | Scripps Ranch High |
| Serra Cluster | Vista Grande Elementary |
| | Hancock Elementary |
| | Elevate Elementary Charter |
| | De Portola Middle |
| | Farb Middle |
| | Serra High |
| University City | University City High |
| | Curie Elementary |

Source: CAL FIRE 2019

### 4.16.2.4 Health Effects Associated with Wildfires

Wildfires provide several natural ecosystem functions, such as facilitating the germination of certain tree species seeds, replenishing soil nutrients, clearing dead biomass to allow new trees to grow, and reducing the amount of fuels (e.g., dead trees) that can lead to destructive wildfires (CARB 2018). However, wildfires can also affect human health by releasing air pollutants from the combustion of vegetation and, in some cases, structures. One of the primary threats to human health associated with wildfire smoke is from airborne particulate matter (PM2.5 and PM10). Because of their small size, particulate matter can enter a person's eyes and respiratory system, which could cause short-term health effects such as burning eyes, sinus issues, and bronchitis. In addition, fine particulates can also exacerbate existing health conditions such as chronic heart and lung diseases (EPA 2018a). Other receptors particularly susceptible to airborne particulate matter from wildfires include people with asthma, older adults, children, and pregnant women (EPA 2018b).

# 4.16.3 Applicable Laws and Regulations

## 4.16.3.1 Federal

### International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code (IBC) use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

### International Wildland–Urban Interface Code

The International Wildland–Urban Interface (WUI) Code is published by the IFC and is a model code addressing wildfire issues.

### Occupational Safety and Health Act of 1970

The Occupational Safety and Health (OSH) Act establishes the framework for safe and healthful working conditions for working men and women by authorizing enforcement of the standards developed under the act. The act also provides for training, outreach, education, and assistance related to establishing a safe working environment. Regulations defining safe standards have been developed for general industry, construction, maritime, recordkeeping, and agriculture. OSH Act Regulations Part 1926 Subpart F, *Fire Protection and Prevention,* requires the development of a fire protection program through all phases of construction and demolition work, and addresses requirements for appropriate firefighting equipment, water sources, sprinkler systems, and alarm systems.

## 4.16.3.2 State

### California Emergency Services Act

The California Emergency Services Act was adopted to establish the state's roles and responsibilities during human-caused or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or resources of the state. This act is intended to protect health and safety by preserving the lives and property of the people of the state.

### California Natural Disaster Assistance Act

The California Natural Disaster Assistance Act provides financial aid to local agencies to assist in the permanent restoration of public real property, other than facilities used solely for recreational purposes, when such real property has been damaged or destroyed by a natural disaster. The California Natural Disaster Assistance Act is activated after a local declaration of emergency and the

California Emergency Management Agency gives concurrence with the local declaration, or after the governor issues a proclamation of a state emergency. Once the act is activated, the local government is eligible for certain types of assistance, depending on the specific declaration or proclamation issued.

## California Department of Forestry and Fire Protection

CAL FIRE protects the people of California from fires, responds to emergencies, and protects and enhances forest, range, and watershed values providing social, economic, and environmental benefits to rural and urban citizens. CAL FIRE's firefighters, fire engines, and aircraft respond to an average of more than 5,400 wildland fires each year (CAL FIRE 2016b). The Office of the State Fire Marshal supports CAL FIRE's mission by focusing on fire prevention. It provides support through a wide variety of fire safety responsibilities including by regulating buildings in which people live, congregate, or are confined; by controlling substances and products which may, in and of themselves, or by their misuse, cause injuries, death, and destruction by fire; by providing statewide direction for fire prevention in wildland areas; by regulating hazardous liquid pipelines; by reviewing regulations and building standards; and by providing training and education in fire protection methods and responsibilities.

## 2018 Strategic Fire Plan for California

The 2018 Strategic Fire Plan for California is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE.

In 2018, the State Board of Forestry and Fire Protection adopted a new strategic fire plan to update and address fire concerns in California. The Board has adopted fire plans since the 1930s and periodically updates them to reflect current and anticipated needs. Over time, as the environmental, social, and economic landscape of California's wildlands has changed, the Board has evolved the Strategic Fire Plan to better respond to these changes and to provide the CAL FIRE with appropriate guidance "…for adequate statewide fire protection of state responsibility areas." (PRC Section 4130). The plan calls for a natural environment that is more fire resilient; buildings and infrastructure that are more fire resistant; and a society that is more aware of and responsive to the benefits and threats of wildland fire; all achieved through local, state, federal, tribal, and private partnerships.

The goals that are critical to achieving the 2018 Strategic Fire Plan's vision revolve around fire prevention, natural resource management, and fire suppression efforts, as broadly construed. Major components include the following:

- Improve the availability and use of consistent, shared information on hazard and risk assessment.
- Promote the role of local planning processes, including general plans, new development, and existing developments, and recognize individual landowner/homeowner responsibilities.
- Foster a shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as Community Wildfire Protection Plans.
- Increase awareness and actions to improve fire resistance of human-made assets at risk and fire resilience of wildland environments through natural resource management.

- Integrate implementation of fire and vegetative fuels management practices consistent with the priorities of landowners or managers.
- Determine and seek the needed level of resources for fire prevention, natural resource management, fire suppression, and related services.
- Implement needed assessments and actions for post-fire protection and recovery.

## Fire Hazard Severity Zones – Public Resources Code Sections 4201–4204

In 1965, PRC Sections 4201–4204 directed CAL FIRE to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These zones, referred to as FHSZ, define the application of various mitigation strategies to reduce risk associated with wildland fires.

## Very High Fire Hazard Severity Zones – Government Code Sections 51175–51189

In 1992, Government Code Sections 51175–51189 established the classification for Very High FHSZs based on fuel loading, terrain, weather, and other relevant factors identified by CAL FIRE as major causes of wildfire spread and based on the severity of fire hazard that is expected to prevail in those areas. The code established the requirements for those that maintain an occupied dwelling within a designated Very High FHSZ. The Very High FHSZs define the application of mitigation measures to reduce risk associated with uncontrolled wildfires and require that the measures be taken. Local agencies designate the locations of Very High FHSZs within its jurisdiction as required by CAL FIRE.

## Education Code Section 17251/California Code of Regulations, Title 5

Education Code Section 17251 and California Code of Regulations (CCR), Title 5, Sections 14001–14012, outline the powers and duties of the California Department of Education regarding school sites and the construction of school buildings. Districts seeking state funding must comply with the Education Code and Title 5. Site approval from the Department must be granted before the State Allocation Board will apportion funds. Districts using local funds are encouraged to seek the Department's approval for the benefits that such outside, objective reviews provide to the school district and the community. The California Department of Education issues and maintains a *School Site Selection and Approval Guide* to assist school districts in selecting sites that provide a safe and supportive environment for the instructional program and the learning process. It outlines the selection criteria for gaining California Department of Education approval, a condition for receiving state funds. Relevant sections of Title 5 as it relates to wildfire include the following:

- Section 14001(f) requires educational facilities planned by school districts to be designed to meet federal, state, and local statutory requirements for structure, fire, and public safety.
- Section 14010(p) requires sites to be conveniently located for public services including but not limited to fire protection, police protection, public transit, and trash disposal whenever feasible.

## School Safety Plans – Education Code Sections 32280–32289

The California Education Code (Sections 32280–32288) outlines the requirements of all public schools operating kindergarten and/or any of grades 1 to 12, inclusive, to write and develop a comprehensive school safety plan relevant to the needs and resources of that particular school. Each school district and county office of education is responsible for the overall development of the school safety plan.

The code requires the comprehensive school safety plan to include disaster procedures, routine, and emergency, including adaptations for pupils with disabilities in accordance with the federal Americans with Disabilities Act of 1990 (42 U.S. Code 12101 et seq.).

## California Building Code and Fire Code

Title 24 of the CCR is a compilation of building standards, including fire safety standards for residential and commercial buildings. The California Building Code (CBC) standards serve as the basis for the design and construction of buildings in California, and the California Fire Code (CFC) is a component of the CBC. Typical fire safety requirements of the CFC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The CFC applies to all occupancies in California, except where more stringent standards have been adopted by local agencies.

## State Fire Regulations

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California.

## California Division of the State Architect

The Division of the State Architect (DSA; part of the California Department of General Services) provides design and construction oversight for K–12 schools, community colleges, and various other State-owned and State-leased facilities to ensure that they comply with all structural, accessibility, and fire and life safety codes (California Department of Education 2019). DSA also develops accessibility, structural safety, and historical building codes and standards utilized in various public and private buildings throughout the state.

DSA’s authority is identified in the Government Code, Education Code, and other applicable laws and standards, such as the Health and Safety Code (Sections 16000-16023 and 18950-18961) and Regulations, Title 24, Parts 1-12. DSA reviews plans for public K–12 schools, community colleges and certain other state funded building projects to ensure that plans, specifications, and construction comply with California's building codes (CCR Title 24). DSA's plan review is composed of four disciplines: Accessibility, Fire and Life Safety, Structural Safety, and Sustainability.

DSA's Fire and Life Safety program addresses the safety of occupants in buildings, as well as property protection related to fire-resistive building materials, fire alarms, fire suppression equipment, safe occupant egress, and firefighting equipment access.

During construction, DSA schedules visits by its field staff to report on the construction and performance of the project inspector to verify compliance with the CBC. During these construction site visits, DSA staff work closely with the project inspector to assure that the intent of the plans and specifications are achieved at the construction site and that all required approvals are properly

administered by the design professionals. DSA also has the authority to stop construction if it does not meet the code.

## 4.16.3.3 Regional

### County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The County's Multi-Jurisdictional Hazard Mitigation Plan is implemented by the County of San Diego Office of Emergency Services. The Multi-Jurisdictional Hazard Mitigation Plan is a county-wide plan that identifies risks posed by natural and human-caused disasters, and discusses ways to minimize potential damage occurring as a result of these disasters. The plan is intended to serve many purposes, including enhancing public understanding and awareness of potential hazardous situations, creating a decision tool for managing hazards, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, providing inter-jurisdictional coordination, and achieving regulatory compliance (County of San Diego 2017).

### Operational Area Emergency Operations Plan

The Office of Emergency Services implements the Operational Area Emergency Operations Plan in collaboration with the Unified San Diego County Emergency Services Organization. The plan is for use by the County and all of the cities within the county to respond to major emergencies and disasters. It describes the roles and responsibilities of all County departments (including many city departments), and the relationship between the County and its departments and the jurisdictions within the County. The plan contains 16 annexes detailing specific emergency operations for different emergency situations (Unified San Diego County Emergency Services Organization and County Of San Diego 2018).

## 4.16.3.4 Local

Although the District's jurisdiction also includes small portions of the cities of La Mesa and Lemon Grove, as well as unincorporated San Diego County, all existing District facilities are within the boundaries of the city. Therefore, only City of San Diego regulations and standards are described below.

### San Diego Unified School District Standard Construction Specifications Section 01.50.00. Temporary Facilities and Controls

Section A, Temporary Fire Controls, of the District's Standard Construction Specifications Section 01.50.00 requires the District's contractors to install and maintain temporary fire-protection facilities of types needed to protect against reasonably predictable and controllable fire losses. Measures included in Section A are as follows.

- Comply with National Fire Protection Association (NFPA) 241; manage fire-prevention program.
- Prohibit smoking on District property.
- Supervise welding operations, combustion-type temporary heating units, and similar sources of fire ignition according to requirements of authorities having jurisdiction.

- Develop and supervise an overall fire-prevention and -protection program for personnel at Project site. Review needs with local fire department and establish procedures to be followed. Instruct personnel in methods and procedures. Post warnings and information.
- Provide temporary standpipes and hoses for fire protection. Hang hoses with a warning sign stating that hoses are for fire-protection purposes only and are not to be removed. Match hose size with outlet size and equip with suitable nozzles.

## City of San Diego Brush Management Policy and Landscape Standards

The City's Brush Management Policy and Landscape Standards were adopted in April 2008 and last updated in May 2010. This policy regulates the construction, alteration, movement, repair, maintenance, and use of any building, structure, or premises within the WUI areas in the city. It requires that a Brush Management Plan and Program be processed in conjunction with any development that is required to obtain discretionary grading and/or building permits. The policy also includes requirements for thinning and pruning native/naturalized vegetation within WUI areas and allowable coverage, massing, and spacing for plants that would be retained. If the full brush management zone(s) cannot be provided, the policy requires that alternative means of fire protection, including fire-rated construction, be identified by the San Diego Fire-Rescue Department (SDFD) and implemented.

## San Diego Fire-Rescue Department Fire Access Roadways Policy

The SDFD has adopted the Fire Access Roadways Policy to clarify requirements outlined in CFC Section 503. Fire access roadways for new and existing buildings are regulated by this policy. The policy requires buildings to be accessible to emergency vehicles. Under this policy, fire apparatus access roadways must not be less than 20 feet of unobstructed width, must have an adequate roadway turning radius, and must have a minimum vertical clearance of 13 feet 6 inches.

## City of San Diego Municipal Code

### Section 55.9401

Under Municipal Code Section 55.9401, the City adopted Very High FHSZs, as recommended by CAL FIRE, as well as the Brush Management Zones, as defined in Municipal Code Section 142.0412, as Very High FHSZs .

### Section 55.0304

Municipal Code Section 55.0304 regulates the management of combustible waste material, including vegetation, by requiring vegetation clearance in WUI areas in accordance with Chapter 49 of the CFC and the City's Land Development Code. Furthermore, this code requires entities who own, control, operate, or maintain electrical transmission or distribution lines to have an approved program in place that identifies poles or towers with equipment and hardware types that have a history of becoming an ignition source, and provides a combustible free space consisting of a clearing of not less than 10 feet in each direction from the outer circumference of such pole or tower during such periods of time as designated by the Fire Code Official.

### Section 142.0412 (i–j)

Municipal Code Section 142.0412 requires brush management in all base zones on publicly or privately owned properties that are within 100 feet of a structure and contain native or naturalized vegetation. This code allows for brush management activities within environmentally sensitive lands, excluding wetlands, that are located within 100 feet of an existing structure. Brush management in wetlands may be requested with a development permit in accordance with Section 143.0110 where the Fire Chief deems brush management necessary. Where brush management is required, a comprehensive program is required to be implemented that reduces fire hazards around structures by providing an effective fire break between all structures and contiguous areas of native or naturalized vegetation. The code requires this fire break to consist of two distinct brush management areas called "Zone One" and "Zone Two." Brush management Zone One is the area adjacent to the structure, and must be least flammable and typically consists of pavement and permanently irrigated ornamental planting. Brush management Zone Two is the area between Zone One and any area of native or naturalized vegetation and typically consists of thinned, native, or naturalized non-irrigated vegetation. The code specifies specific brush management measures and landscape standards for these zones. The code requires that the width of Zone One and Zone Two not exceed 100 feet. A site-specific plan that includes brush management measures is required to establish brush management Zones One and Two for new development. Brush management activities are prohibited within coastal sage scrub, maritime succulent scrub, and coastal sage-chaparral habitats from March 1 through August 15, except where documented to the satisfaction of the City Manager that the thinning would be consistent with conditions of species coverage described in the City's Multiple Species Conservation Plan Subarea Plan.

### Article 5, Division 7

The City's Municipal Code (Article 5, Division 7) addresses additions and modifications to Chapter 7 of the CBC, including requirements for building codes in Very High FHSZs in the city.

# 4.16.4 Impact Analysis

## 4.16.4.1 Methodology

The analysis of potential impacts related to wildfire was based on a review of available data to determine the presence of Very High FHSZs within and adjacent to the Program area, and considered whether future construction and operational activities associated with the Proposed Program would exacerbate wildfire risk and related hazards. The Proposed Program consists of four project categories that represent typical capital improvement projects that could be implemented at any of the District's existing school and administrative sites, or future unidentified sites. The impact analysis considers the potential for each of the project categories associated with the Proposed Program to exacerbate wildfire risk at a programmatic level, and also includes an analysis of potential wildfire impacts resulting from the 21 near-term, site-specific whole site modernization projects.

## 4.16.4.2 Thresholds of Significance

The following significance criteria are based on Appendix G of the State CEQA Guidelines and provide the basis for determining the significance of impacts associated with wildfire. The determination of whether a wildfire impact would be significant is based on the thresholds described below and the professional judgment of the District as Lead Agency and the recommendations of qualified personnel at ICF, all of which is based on the evidence in the administrative record.

Impacts would be significant if the Proposed Program would result in any of the following.

1. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.
2. Be located in or near state responsibility areas or lands classified as Very High FHSZ and substantially impair an adopted emergency response plan or emergency evacuation plan.
3. Be located in or near state responsibility areas or lands classified as Very High FHSZ and, due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
4. Be located in or near state responsibility areas or lands classified as Very High FHSZ and 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 on the environment.
5. Be located in or near state responsibility areas or lands classified as Very High FHSZ and 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.

As discussed in Section XX of the Initial Study/Environmental Checklist (Appendix B), Threshold 2 is not included in the analysis below, because it was determined that the Proposed Program would not result in significant impacts related to substantially impairing an adopted emergency response plan or emergency evacuation plan. Those conclusions and the rationale that supports them are summarized in Chapter 6, *Additional Consequences of Project Implementation.* Therefore, only Thresholds 1, 3, 4, and 5 are discussed in the following impact analysis.

# 4.16.4.3 Impacts and Mitigation Measures

***Threshold 1: Would the Proposed Program expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

***Construction***

The city is subject to both wildland and urban fires due to its climate, topography, and native vegetation (City of San Diego 2019). The extended drought characteristic of the region's Mediterranean climate and increasingly severe dry periods associated with climate change result in large areas of dry native vegetation that provide fuel for wildland fires. State law requires that all local jurisdictions identify Very High FHSZs within their areas of responsibility (California Government Code 51175–51189). Inclusion within these zones is based on vegetation density, slope severity, and other relevant factors that contribute to fire severity.

Under the Proposed Program, there is a potential that new sites could be acquired for school and/or administrative purposes, which could be sited adjacent to canyons, steep slopes, or other areas designated as Very High FHSZ areas. While new site acquisition is an administrative process that does not directly result in physical changes on the environment, acquisition of new sites for schools, charter schools, or administrative facilities would result in possible demolition of existing structures (if located on developed sites) and construction of new buildings and other academic support facilities (e.g., athletic fields).

Construction activities for new school or administrative facilities projects, when they are located at sites within a Very High FHSZ, would involve equipment that may exacerbate wildfire risk in these areas. Heat or sparks from construction equipment or vehicles, as well as the use of flammable materials, have the potential to ignite adjacent vegetation and start a fire. This risk is increased during Santa Ana weather events, which consist of low humidity and high wind speeds and can occur year-round in the San Diego region, but are more common in the summer and fall (City of San Diego 2018). The following construction-related equipment and practices have the potential to generate heat or sparks that could result in wildfire ignition:

- Cranes, generator sets, backhoes, excavators, trucks, and vehicles may result in heated exhaust that, if it came into contact with vegetation, could result in fire ignition.
- Welders consist of an open heat source that may result in metallic sparks that could ignite vegetation.

Construction activities could also introduce new potential ignition sources in the form of building materials (e.g., wood), vegetation for landscaping, and other materials for construction that are considered flammable, such as fuels and household cleaners. These potential sources of ignition or fuel would contribute to the risk of a wildfire starting at the construction site, which would exacerbate the existing high wildfire risk if located within a Very High FHSZ.

Proposed construction would be required to comply with applicable construction standards that ensure the implementation of fire prevention features. This includes complying with the regulations set forth in the CFC and Occupational Safety and Health Administration (OSHA) Safety and Health Regulations for Construction, as enforced by the DSA during both project planning/design and construction. Chapter 33, *Fire Safety During Construction and Demolition,* Section 3308 of the CFC requires the preparation of a "pre-fire plan." OSHA Regulations Part 1926 Subpart F, *Fire Protection and Prevention,* requires the development of a fire protection program through all phases of construction and demolition work, and addresses requirements for appropriate firefighting equipment, water sources, sprinkler systems, and alarm systems. Additionally, all new structures must comply with the CBC and CFC. The CBC establishes fire safety requirements, such as fire resistance standards for fire doors, building materials, and particular types of construction. The CFC includes safety measures to be followed during construction and demolition activities, such as the proper storage procedures for combustible materials, and the proper refueling protocol. Construction activities for school and administrative facilities projects would comply with the CBC and CFC, which would ensure the proper fire prevention and management measures are implemented within a Very High FHSZ. New school or administrative facilities constructed within lands designated as Very High FHSZs are subject to additional fire safety provisions, including fuel modification plans and review by the State Fire Marshall and SDFD.

Existing regulations would address potential fire risks associated with the construction of new structures, including using appropriate equipment, conducting fuel modification, and obtaining review and approval by the State Fire Marshall and SDFD. However, if construction or demolition activities associated with the Proposed Program are to occur within Very High FHSZs, the existing regulations may not adequately address the heightened risks, and further precautions may need to be taken. Because the locations of future new acquisitions and new school constructions are not known, future sites could have conditions onsite that would present additional wildfire risks, and it is not known whether existing regulations would be adequate to address all potential risks. Therefore, construction activities associated with new acquisitions and new school construction located within Very High FHSZs could result in a potentially significant impact related to exacerbating wildfire risks of, and thereby exposing project occupants to, direct or indirect risk of injury, loss, or death due to wildfire (**Impact-WF-1**).

Implementation of mitigation measure **MM-WF-1** would be required, which ensures that the District would prepare a Construction Fire Protection Plan (CFPP) to minimize potential construction-related impacts associated with wildfire risk for new acquisitions and new school or administrative facilities projects. However, the locations of future site acquisitions and new school or administrative facilities are unknown, and the potential wildfire-related risks are also unknown. Without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of a CFPP would effectively reduce the potential impacts to less than significant. Therefore, **Impact-WF-1** would be significant and unavoidable.

***Operation***

The operation of new school or administrative facilities could introduce additional students and staff to District-owned property. If a newly acquired or newly constructed school or administrative facility is located within a Very High FHSZ, it could expose additional students, staff, and structures to hazardous conditions associated with the high risk of wildfire. Furthermore, the addition of more people and structures to an area that is already designated as a Very High FHSZ could exacerbate existing wildfire risks by increasing the possibility of human-caused wildland fires. Although all new

school or administrative facilities would operate in compliance with the CFC, there would still be a potential impact due to the increased number of people and structures onsite, which would increase the potential for wildfires created from human-related sources. Therefore, operation of this project category would result in a potentially significant impact related to exposure of people or structures, either directly or indirectly, to a significant loss, injury, or death involving wildland fires (**Impact-WF-2)**.

Implementation of mitigation measure **MM-WF-2** would be required, which ensures that the District would prepare a Fire Protection Plan (FPP) to mitigate the risk of wildfire impacts related to flammable vegetation. However, the locations of future site acquisitions and new school or administrative facilities are unknown, and the potential wildfire-related risks are also unknown. Without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of an FPP would effectively reduce the potential impacts to less than significant. Therefore, **Impact-WF-2** would be significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-WF-1: Potential to Exacerbate the Risk of Wildfire During Construction of New Acquisition and New School or Administrative Facilities Projects.** Construction activities associated with new acquisition and new school or administrative facilities projects in areas designated as Very High Fire Hazard Severity Zones could result in a potentially significant impact related to exacerbating wildfire risks from construction equipment and vehicles, as well as the use of flammable materials. Impacts would be potentially significant.

#### *Operation*

**Impact-WF-2: Potential to Exacerbate the Risk of Wildfire During Operation.** If new acquisition and new school or administrative facilities projects are implemented in areas designated as Very High Fire Hazard Severity Zones, operation of these new facilities could exacerbate wildfire risk that could expose students, staff, and onsite structures to significant hazards associated with wildfires. Impacts would be potentially significant.

### Mitigation Measures

For **Impact-WF-1**:

**MM-WF-1: Prepare a Construction Fire Protection Plan.** For projects implemented under the Proposed Program that are proposed in areas designated as Very High Fire Hazard Severity Zones, prior to construction, the District shall prepare a Construction Fire Protection Plan (CFPP) for the District property. The CFPP shall include, but not be limited to, the following measures to address potential ignition sources during construction:

- Parking for workers' vehicles and equipment will be designated away from dry brush and other ignition sources.
- Vehicle idling will be prohibited.
- During high fire risk conditions, designated vehicles will carry fire-prevention equipment, such as water, a shovel, and/or a fire extinguisher on the construction site at all times.

- Fireproof mats or shields will be used during welding or other construction activities that could produce sparks during high fire risk conditions.
- The District's temporary fire protection measures will be implemented as required by Section 01.50.00, Section A. Temporary Fire Protection, of the Standard Construction Specifications, which includes, but is not limited to, compliance with National Fire Protection Association 241 (fire prevention program); installation and maintenance of temporary fire-protection facilities; prohibiting smoking on District property; and supervising welding operations, combustion-type temporary heating units, or similar sources of fire ignition.
- A buffer will be established between vegetated canyons or other high fire risk areas on the project site during all construction activity.

The District shall review the CFPP as part of the approval for any future project under this Program and determine the adequacy of the CFPP to mitigate future project-specific impacts. To the extent the CFPP does sufficiently mitigate a future project's impacts, the District shall prepare subsequent/supplemental environmental review to determine whether there are any additional, feasible mitigation measures that would mitigate impacts to a less-than-significant level.

For **Impact-WF-2**:

**MM-WF-2: Prepare a Fire Protection Plan.** For new acquisition or new school or administrative facilities projects that are proposed in areas designated as Very High Fire Hazard Severity Zones (FHSZs), the District shall prepare a Fire Protection Plan (FPP) for the District property prior to commencing operation of the facility. The FPP shall be prepared to ensure that new school or administrative facilities developed within Very High FHSZs are in compliance with current regulatory codes and that impacts resulting from wildland fire hazards are adequately mitigated. The FPP shall include, but would not be limited to, the following:

- Measures to address specific location, topography, geology, level of flammable vegetation, and climate of the project site.
- Measures consistent with applicable fire codes.
- A vegetation management plan that includes measures such as reducing flammable vegetation around the property's structure and installing sprinklers that activate in the case of fire.

In addition, the following elements shall be included within the FPP:

- Emergency Services – Availability and Travel Time.
- Access for Emergency Services and Evacuation of Students and Faculty (primary and, if required, additional access).
- Firefighting Water Supply.
- Fire Sprinkler System.
- Ignition Resistant Construction.
- Defensible Space, Ornamental Landscaping, and Vegetation Management.

The District shall review the FPP as part of the approval for any future project under this Program and determine the adequacy of the FPP to mitigate future project-specific impacts. To the extent the FPP does sufficiently mitigate a future project's impacts, the District shall prepare subsequent/supplemental environmental review to determine whether there are any additional, feasible, mitigation measures that would mitigate impacts to a less-than-significant level.

### Level of Significance After Mitigation

#### *Construction*

**MM-WF-1** requires the District to prepare a CFPP to minimize potential construction-related impacts associated with wildfire risk for new acquisitions and new school or administrative facilities projects. However, the locations of future site acquisitions and new school or administrative facilities are unknown, and the potential wildfire-related risks are also unknown. Without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of a CFPP would effectively reduce the potential impacts to less than significant. Therefore, **Impact WF-1** would be significant and unavoidable.

#### *Operation*

**MM-WF-2** requires the District to prepare an FPP to mitigate the risk of wildfire impacts related to flammable vegetation. However, the locations of future site acquisitions and new school or administrative facilities are unknown, and the potential wildfire-related risks are also unknown. Without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of an FPP would effectively reduce the potential impacts to less than significant. Therefore, **Impact-WF-2** would be significant and unavoidable.

## All Other Project Categories

### Impact Discussion

#### *Construction*

As shown on Figures 4.16-1 through 4.16-18 and in Table 4.16-2, the Program area includes several areas designated as Very High FHSZs, with 44 existing school sites being located within Very High FHSZs. Reasonably foreseeable activities associated with the Proposed Program that would occur within or adjacent to areas designated as Very High FHSZs have the potential to exacerbate wildfire risk. Construction of whole site modernization projects, upgrades of existing school and administrative sites, and construction of joint-use facilities would temporarily bring additional workers to existing District facilities, as well as temporarily bring construction equipment, vehicles, and material to the site that could be sources of wildfire ignition or spread. If this construction work would occur on one of the existing school sites identified in Table 4.16-2 as being within a Very High FHSZ, these activities could exacerbate wildfire risk and expose temporary construction workers as well as District staff and students to wildfire hazards.

All new structures, as well as upgrades to existing structures, must comply with the CBC and CFC, including safety measures to be followed during construction and demolition activities, such as the proper storage procedures for combustible materials, the proper refueling protocol, and preparation of a "pre-fire plan." Construction activities for whole site modernization, upgrades of

existing school and administrative sites, and joint-use facilities at any existing District-owned site would comply with the CBC and CFC, which would ensure the proper fire prevention and management measures are implemented within a Very High FHSZ.

Proposed construction would also be required to comply with OSHA Safety and Health Regulations for Construction, as enforced by the DSA during both project planning/design and construction, including the development of a fire protection program. Moreover, future projects associated with the Proposed Program constructed within or immediately adjacent to lands designated as Very High FHSZs are subject to additional fire safety provisions, including fuel modification plans and review by the State Fire Marshall and SDFD. Therefore, compliance with existing regulations during construction activities for all other project categories at existing District sites within areas identified as Very High FHSZs would reduce the risk of wildfire caused by construction equipment, as well as potential pollutant concentrations resulting from wildfire, or the uncontrolled spread of wildfire. Thus, the impact would be less than significant.

***Operation***

Whole site modernizations, upgrades of existing school and administrative sites, or joint-use facilities development projects at any of school facilities included in Table 4.16-2 would occur at existing school sites within Very High FHSZs. However, these project categories would not increase enrollment capacity at any school facilities, nor would they increase the number of District staff at existing administrative facilities. Thus, the operation of these project categories would not alter existing conditions such that they would exacerbate existing wildfire hazards within Very High FHSZs. Therefore, during operation, these project categories would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and the impact would be less than significant.

### Level of Significance Prior to Mitigation

***Construction***

Construction of all other project categories would not result in significant impacts. Therefore, whole site modernizations, upgrades of existing school or administrative sites, and joint-use facilities development projects would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

***Operation***

Operation of all other project categories would not exacerbate existing wildfire hazards. Therefore, whole site modernizations, upgrades of existing school or administrative sites, and joint-use facilities development projects would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction of all other project categories would not result in significant impacts associated with construction. Therefore, whole site modernizations, upgrades of existing school or administrative sites, and joint-use facilities development projects would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

#### *Operation*

Operation of all other project categories would not exacerbate existing wildfire hazards. Therefore, whole site modernizations, upgrades of existing school or administrative sites, and joint-use facilities development projects would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

## Site-Specific Analysis

The District has identified near-term, site-specific whole site modernization projects associated with the Proposed Program that would be implemented at 21 school sites, as shown in Table 4.16-3. At this time, the specific details for each of these projects are unknown. However, the near-term projects would involve a combination of the improvements identified under the whole site modernization project category.

**Table 4.16-3. Near-Term, Site-Specific Whole Site Modernization Projects**

| School | Location |
|---|---|
| Baker Elementary School | 4041 T Street (92113) |
| Barnard Asian Pacific Language Academy | 2445 Fogg Street (92109) |
| Boone Elementary School | 7330 Brookhaven Road (92114) |
| Clairemont High School | 4150 Ute Drive (92117) |
| Correia Middle School | 4302 Valeta Street (92107) |
| Crown Point Junior Music Academy | 4033 Ingraham Street (92109) |
| Euclid Elementary School | 4141 Menlo Avenue (92105) |
| Fulton K–8 School | 7055 Skyline Drive (92114) |
| Kearny High School | 1954 Komet Way (92111) |
| Lewis Middle School | 5170 Greenbrier Avenue (92120) |
| Madison High School | 4833 Doliva Drive (92117) |
| Marshall Elementary School | 3550 Altadena Avenue (92105) |
| Oak Park Elementary School | 2606 54th Street (92105) |
| Pacific Beach Elementary School | 1234 Tourmaline Street (92109) |
| Pacific View Leadership Elementary School | 6196 Childs Avenue (92139) |
| Paradise Hills Elementary School | 5816 Alleghany Street (92139) |
| Perkins K–8 School | 1770 Main Street (92113) |
| Perry Elementary School | 6290 Oriskany Road (92139) |

| School | Location |
|---|---|
| Roosevelt Middle School | 3366 Park Boulevard (92103) |
| Rowan Elementary School | 1755 Rowan Street (92105) |
| Valencia Park Elementary School | 5880 Skyline Drive (92114) |

Source: District 2019.

## Impact Discussion

### Construction

As shown in Table 4.16-4, three existing schools proposed for near-term, site-specific whole site modernization projects are located partially or entirely within Very High FHSZs (also see Figures 4.16-1 through 4.16-18). Whole site modernization projects would temporarily bring workers to the area during construction activities. As discussed above, construction activities could exacerbate wildfire risk if located within a Very High FHSZ. As such, temporary construction workers at these three school sites could be exposed to wildfire hazards. However, construction activities would be temporary and would not result in additional permanent personnel at the school sites who could be exposed to high fire hazard risk. Construction at all other site-specific schools that are not located in Very High FHSZs would likewise not increase the risk of exposing personnel to wildfire-related hazards.

**Table 4.16-4. Near-Term, Site-Specific Whole Site Modernization Projects Located Within Very High FHSZs**

| School | Location |
|---|---|
| Kearny High School | 1954 Komet Way (92111) |
| Perry Elementary School | 6290 Oriskany Road (92139) |
| Roosevelt Middle School | 3366 Park Boulevard (92103) |

Source: District 2019, CAL FIRE 2019

Additionally, upgrades and new structures implemented as part of a near-term, site-specific whole site modernization project must comply with the CBC and CFC including safety measures to be followed during construction and demolition activities as described above. Proposed construction would also be required to comply with OSHA Safety and Health Regulations for Construction, as enforced by DSA during both project planning/design and construction, including the development of a fire protection program. Moreover, future near-term, site-specific whole-site modernization projects constructed within or immediately adjacent to lands designated as Very High FHSZs are subject to additional fire safety provisions, including fuel modification plans and review by the State Fire Marshall and SDFD. Compliance with these standards would ensure structures built in Very High FHSZs would include appropriate fire prevention and management measures. Therefore, whole site modernization projects at the site-specific schools would not exacerbate existing potential wildfire conditions and would not expose people or structure, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and the impact would be less than significant.

### Operation

Implementation of the near-term, site-specific whole site modernization projects would not change the operations at the existing schools, nor would it result in an increase in enrollment capacity at the schools. As such, operation of the near-term, site-specific whole site modernization projects in Very High FHSZs (see Table 4.16-4) would be similar to existing conditions. This includes fire prevention measures as required by the CBC and CFC, such as structural hardening, access, water supply, and fuel modification. These school sites would be required to maintain state-mandated, 100-foot defensible space standards, which the State Fire Marshal and SDFD Fire Marshal enforce with regular inspections of school sites. Thus, the operation of these projects would not alter existing conditions such that they would exacerbate existing wildfire hazards within Very High FHSZs. Therefore, near-term, site-specific whole site modernization projects would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and the impact would be less than significant.

## Level of Significance Prior to Mitigation

### Construction and Operation

Construction and operation of near-term, site-specific whole site modernization projects would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

### Construction and Operation

Construction and operation of near-term, site-specific whole site modernization projects would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

***Threshold 3: Would the Proposed Program be located in or near state responsibility areas or lands classified as Very High FHSZ and, due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***

## Program-Level Analysis

### New Acquisition and New School or Administrative Facilities

#### Impact Discussion

***Construction***

New acquisition and new school or administrative facilities projects could be sited within Very High FHSZ areas. Construction of new buildings would include the use of equipment and materials that could be a source of wildfire ignition, and could increase the risk of wildfire at the project site. Construction of new buildings could also bring workers to the site who would not have otherwise been exposed to the potential threat associated with wildfire, pollutant concentration after wildfire, or the threat of uncontrolled fire. New acquisition and construction of new school or administrative facilities would comply with existing regulations from, for example, the CBC, CFC, OSH Act, State Fire Marshall, and SDFD. However, because the locations of future acquisitions and new school or administrative facility construction are unknown, the potential fire risks associated with new sites are also unknown. Therefore, construction activities associated with new acquisitions and new school construction located within Very High FHSZs could result in a potentially significant impact related to exacerbating wildfire risks of, and thereby exposing people to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire (**Impact-WF-3)**.

Implementation of **MM-WF-1** would be required, which would ensure that the District would prepare a CFPP to minimize potential construction-related impacts associated with wildfire risk for new acquisitions and new school or administrative facilities projects. However, the locations of future site acquisitions and new school or administrative facilities are unknown, and the potential wildfire-related risks are also unknown. Without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of a CFPP would effectively reduce the potential impacts to less than significant. Therefore, **Impact-WF-3** would be significant and unavoidable.

***Operation***

The operation of a new school or administrative facility would introduce additional students and staff to a new area of the District. If a newly acquired or newly constructed school or administrative facility is located within a Very High FHSZ, it could expose additional students, staff, and structures to hazardous conditions associated with the high risk of wildfire at the site that were not previously exposed to this risk. Furthermore, the addition of more people and structures to an area that is designated as a Very High FHSZ could exacerbate existing wildfire risks by increasing the possibility of human-caused wildfires, as it is estimated that 80% of wildfires are ignited by humans (Balch et al. 2017). While most new acquisitions would be considered in-fill and would not introduce people

or structures to a previously undeveloped area, it is possible that some would result in more people working at and/or attending the school or administrative facility.

All new school or administrative facilities would be required to operate in compliance with the CFC, CBC, and state-mandated 100-foot defensible space standards (PRC Section 4291). However, because the exact locations of any new school or administrative sites are unknown at this time, which could be within or immediately adjacent to a Very High FHSZ, it cannot be guaranteed that the operation of any new facility would not exacerbate wildfire risk, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire (**Impact-WF-4**). Implementation of **MM-WF-2** would be required, which would ensure that the District would prepare an FPP to mitigate the risk of wildfire impacts related to operation of a new school and/or administrative facilities in Very High FHSZs. However, the locations of future site acquisitions and new school or administrative facilities are unknown, and the potential wildfire-related risks are also unknown. Without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of an FPP would effectively reduce the potential impacts to less than significant. Therefore, **Impact-WF-4** would be significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-WF-3: Potential to Exacerbate the Risk of Wildfire and Expose Project Occupants to Pollutants or Uncontrolled Spread of Wildfire During Construction.** Construction activities associated with the Proposed Program may be located within a Very High Fire Hazard Severity Zone and could result in a potentially significant impact related to exacerbating wildfire risks of, and thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be potentially significant.

#### *Operation*

**Impact-WF-4: Potential to Expose Project Occupants to Pollutants or Uncontrolled Spread of Wildfire During Operation.** New acquisition and new school or administrative facilities projects may be located within a Very High Fire Hazard Severity Zone and could exacerbate wildfire risk by introducing additional students and/or staff to the area, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be potentially significant.

### Mitigation Measures

For **Impact-WF-3:**

Implement **MM-WF-1**, as described above.

For **Impact-WF-4:**

Implement **MM-WF-2**, as described above.

### Level of Significance After Mitigation

#### *Construction*

**MM-WF-1** is required to ensure that the District will prepare a CFPP to minimize potential construction-related impacts associated with wildfire risk for new acquisitions and new school or administrative facilities projects. However, the locations of future site acquisitions and new school or administrative facilities are unknown, and the potential wildfire-related risks are also unknown. Without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of a CFPP would effectively reduce the potential impacts to less than significant. Therefore, **Impact-WF-3** would be significant and unavoidable.

#### *Operation*

**MM-WF-2** requires the District to prepare an FPP to mitigate the risk of wildfire impacts related to operation of new school and/or administrative facilities in Very High FHSZs. However, the locations of future site acquisitions and new school or administrative facilities are unknown, and the potential wildfire-related risks are also unknown. Without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of an FPP would effectively reduce the potential impacts to less than significant. Therefore, **Impact-WF-4** would be significant and unavoidable.

## All Other Project Categories

### Impact Discussion

#### *Construction*

As shown on Figures 4.16-1 through 4.16-18 and in Table 4.16-2, the Program area has several areas designated as Very High FHSZs, with a total of 44 existing school sites being located within Very High FHSZs. Several of these existing school sites are adjacent to canyons with steep slopes. Reasonably foreseeable activities associated with whole site modernization projects, upgrades of existing school and administrative sites, or joint-use facilities projects, within or adjacent to areas designated as Very High FHSZs have the potential to exacerbate wildfire risk, particularly those activities occur in areas with steep topography and/or prevailing winds as these conditions contribute to the spread of wildfires and also make it more difficult to contain wildfires.

As discussed under *Threshold 1,* construction activities would be governed by the CBC and CFC. These codes establish requirements that would be applicable during construction and demolition, including proper storage procedures for combustible materials and the proper refueling protocol. In addition, future projects at existing District facilities would comply with the regulations set forth in the CFC and OSHA Safety and Health Regulations for Construction, as enforced by the DSA during both project planning/design and construction. Future projects associated with the Proposed Program constructed within lands designated as Very High FHSZs would also be subject to additional fire safety provisions, including fuel modification plans and review by the State Fire Marshall and SDFD. Therefore, compliance with existing regulation during construction of whole site modernization, upgrades, and joint-use facilities projects at existing school facilities located within areas identified as Very High FHSZs would reduce the risk of wildfire caused by construction equipment, as well as potential pollutant concentrations resulting from wildfire, or the uncontrolled spread of wildfire. The impact would be less than significant.

***Operation***

Existing school and administrative facilities located in Very High FHSZs are currently required to be consistent with the CBC and the CFC, which includes requirements for structural hardening (e.g., Class A roof systems), access, water supply, and fuel modification. Structural hardening requirements address roofs, eaves, exterior walls, vents, appendages, windows, and doors, resulting in hardened structures that have been proven to perform at high levels (resist ignition) during the typically short duration of exposure to burning vegetation from wildfires. Additionally, school and administrative sites in Very High FHSZs would be required to be consistent with state-level 100-foot defensible space standards (PRC Section 4291). The State Fire Marshall and SDFD Fire Marshall enforce brush management requirements with regular inspections of school sites. Provisions for defensible space separating wildland fuels from structures and requirements for interior sprinklers (required in the CBC/CFC 2019 update) can reduce the number of structure losses in wildfire-prone areas. The projects implemented as part of the Proposed Program would be operated according to these fire protection standards to reduce the risk of fire ignition and/or spread. Additionally, these project categories would not increase enrollment capacity at any school facilities, nor would they increase the number of District staff at existing administrative facilities. As such, operation of these project categories would not alter existing conditions such that they would exacerbate existing wildfire hazards within Very High FHSZs.

Adherence to the CBC and CFC, and compliance with best design and management practices would ensure that impacts related to exacerbating wildfire risks of, and thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be less than significant.

**Level of Significance Prior to Mitigation**

***Construction***

Construction associated with whole site modernization, upgrades of existing school and administrative sites, and joint-use field development projects would not exacerbate wildfire risk, and therefore would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

***Operation***

Operations associated with whole site modernization, upgrades of existing school and administrative sites, and joint-use field development projects would not exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

**Mitigation Measures**

No mitigation is required.

**Level of Significance After Mitigation**

***Construction***

Construction associated with whole site modernization, upgrades of existing school and administrative sites, and joint-use field development projects would not exacerbate wildfire risk,

and therefore would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

***Operation***

Operations associated with whole site modernization, upgrades of existing school and administrative sites, and joint-use field development projects would not exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

# Site-Specific Analysis

## Impact Discussion

### Construction

Construction of near-term, site-specific whole site modernization projects at the three existing school sites that are partially or entirely within Very High FHSZs (see Table 4.16-4) could involve construction equipment and materials that may exacerbate wildfire risk in these areas. Heat or sparks from construction equipment and vehicles have the potential to ignite adjacent vegetation and start a fire. Construction materials such as wood, vegetation for landscaping, and flammable fuels or cleaners could be potential ignition sources or fuel for wildfires. The presence of construction equipment and materials could exacerbate the risk of wildfire ignition at these three school sites, which could exacerbate the potential to expose people to pollution from a wildfire or the uncontrolled spread of wildfire.

All proposed construction would be required to comply with applicable construction standards that ensure the implementation of fire prevention features. This includes complying with the regulations set forth in the CFC, CBC, and OSHA Safety and Health Regulations for Construction, as enforced by the DSA during both project planning/design and construction. Additionally, these near-term, site-specific whole site modernization projects would be subject to additional fire safety provisions, including fuel modification plans and review by the State Fire Marshall and SDFD. Therefore, compliance with existing regulations during construction of near-term, site-specific whole site modernization projects within Very High FHSZ areas would reduce the risk of wildfire caused by, or spread by, construction equipment, as well as the potential risk of pollutant concentrations resulting from wildfire, or the uncontrolled spread of wildfire. Thus, the impacts would be less than significant.

### Operation

Operation of the near-term, site-specific whole site modernization projects in Very High FHSZs (see Table 4.16-4) would be similar to existing conditions. This includes fire prevention measures as required by the CBC and CFC, such as structural hardening, access, water supply, and fuel modification. These school sites would be required to maintain state-mandated, 100-foot defensible space standards, which the State Fire Marshal and SDFD Fire Marshal enforce with regular inspections of school sites. Continued adherence with these regulatory requirements during operations would ensure the impacts related to exacerbating wildfire risks of, and thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be less than significant.

## Level of Significance Prior to Mitigation

### Construction and Operation

Construction and operation of the near-term, site-specific whole site modernization projects would not exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

### Construction and Operation

Construction and operation of the near-term, site-specific whole site modernization projects would not exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

***Threshold 4: Would the Proposed Program be located in or near state responsibility areas or lands classified as Very High FHSZ, and 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 on the environment?***

# Program-Level Analysis

## New Acquisition and New School or Administrative Facilities

### Impact Discussion

#### *Construction*

New school and administrative facilities could be constructed on undeveloped land without utilities or other infrastructure, or on developed sites that would require relocation or modifications to existing utilities and infrastructure. The installation or extension of new utilities, such as water, electricity, and telecommunications, for new school or administrative facilities that are sited within or adjacent to Very High FHSZ areas could exacerbate wildfire risk, particularly the installation of electrical utilities, due to the high fire-ignition potential of electricity and the highly flammable nature of materials used during construction. New school or administrative facilities are not anticipated to require new or extended roadways or other similar infrastructure.

The Proposed Program would be required to comply with all applicable CBC and CFC requirements for development in a Very High FHSZ, including, but not limited to, specific requirements for structural hardening, water supply and flow, hydrant and standpipe spacing, signage, and fire department access. The construction process of installing overhead or underground electric utilities may temporarily increase the risk of fire ignition due to the type of materials and equipment used during the process, as well as the high fire risk of electricity in general. Electric utility construction

would be conducted by qualified technicians (SDG&E personnel) who would implement proper safety procedures required by the California Public Utilities Commission (CPUC), and the structures to which these utilities would supply electricity would be required to be built in accordance with CBC requirements. However, due to the unknown future locations of new acquisitions and new school or administrative facilities, it is possible the construction or extension of utilities would exacerbate the existing wildfire risk at the site if the new facilities are located in Very High FHSZs. Therefore, implementation of the Proposed Program may include construction of infrastructure that would exacerbate wildfire risk or result in additional temporary or permanent impacts on the environment (**Impact-WF-5**).

**MM-WF-1** would be required, which would ensure preparation of a CFPP to mitigate the risk of wildfire impacts related to utility construction. However, because the locations of new acquisition and new school or administrative facilities projects are unknown, and the types of infrastructure needed at these future locations are unknown, it cannot be assured that **MM-WF-1** would reduce potential impacts (**Impact-WF-5**) related to exacerbating wildfire risk or resulting in temporary or permanent environmental impacts to a less-than-significant level. The impact would be significant and unavoidable.

***Operation***

Operation of new school or administrative facilities would not require the installation of new infrastructure once the buildings have been constructed or the projects have been completed. New school or administrative facilities on developed sites would be served by existing public utilities, or, if public utilities do not exist on the site, they would be extended from the nearest location to the site (see Section 4.15, *Utilities and Service Systems)*. Depending on the locations of new school or administrative facilities, the on-going operation of utilities such as overhead power lines could potentially exacerbate wildfire risk if located within or adjacent to Very High FHSZs. Additionally, operation of new school or administrative facilities within or adjacent to Very High FHSZs may require the implementation of certain measures to protect defensible space surrounding the property, such as routine vegetation clearing or additional sprinkler systems. These measures would be intended to reduce the potential risk of fire ignition and spread on the District property. While protective measures such as brush management are intended to reduce wildfire risk, the ongoing removal of vegetation could result in other impacts on the environment. Therefore, because the locations of new acquisition and new school or administrative facilities projects are unknown, and the types of fire breaks or utilities that may be required at these locations are unknown, there is the potential that fire breaks, utilities, or other infrastructure could pose temporary or permanent environmental impacts during operations (**Impact-WF-6**).

Implementation of **MM-WF-2** would be required, which would ensure that the District will prepare an FPP to mitigate the risk of wildfire impacts related to operation of a new school and/or administrative facilities in Very High FHSZs. However, because the locations of new acquisition and new school or administrative facilities projects are unknown, and the types of infrastructure needed at these future locations are unknown, it cannot be assured that **MM-WF-2** would reduce potential impacts (**Impact-WF-6**) related to exacerbating wildfire risk or resulting in temporary or permanent environmental impacts to less-than-significant levels. The impact would be significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-WF-5: Exacerbate Wildfire Risk from the Installation of New Infrastructure During Construction of New Acquisition and New School or Administrative Facilities Projects.** Construction activities associated with new school or administrative facilities may require the installation of new or extended utilities in Very High Fire Hazard Severity Zones, which could exacerbate the wildfire risk to the students and staff at these project sites during construction. Impacts would be potentially significant.

#### *Operation*

**Impact-WF-6: Exacerbate Wildfire Risk from the Maintenance of Infrastructure or Fire Breaks.** Operations associated with new school or administrative facilities may require the operational maintenance of infrastructure (e.g., utilities), fire breaks, or other fire-protection measures in Very High Fire Hazard Severity Zones, which could result in temporary or ongoing environmental impacts. Impacts would be potentially significant.

### Mitigation Measures

For **Impact-WF-5:**

Implement **MM-WF-1**, as described above.

For **Impact-WF-6:**

Implement **MM-WF-2,** as described above.

### Level of Significance After Mitigation

#### *Construction*

**MM-WF-1** would ensure preparation of a CFPP to mitigate the risk of wildfire impacts related to utility construction. However, because the locations of new acquisition and new school or administrative facilities projects are unknown, and the types of infrastructure needed at these future locations are unknown, it cannot be assured that **MM-WF-1** would reduce potential impacts (**Impact-WF-5**) related to exacerbating wildfire risk or resulting in temporary or permanent environmental impacts to a less-than-significant level. The impact would be significant and unavoidable.

#### *Operation*

**MM-WF-2** would ensure that the District will prepare an FPP to mitigate the risk of wildfire impacts related to operation of new school and/or administrative facilities in Very High FHSZs. However, because the locations of new acquisition and new school or administrative facilities projects are unknown, and the types of infrastructure needed at these future locations are unknown, it cannot be assured that **MM-WF-2** would reduce potential impacts (**Impact-WF-6**) related to exacerbating wildfire risk or resulting in temporary or permanent environmental impacts to less-than-significant levels. The impact would be significant and unavoidable.

## Whole Site Modernization

### Impact Discussion

#### *Construction*

Whole site modernization of existing schools (including charter schools) could require the relocation of existing utilities to the locations of any new structures constructed under this project category. The installation or relocation of new utilities, such as water, electricity, and telecommunications, on existing school sites that are within or adjacent to Very High FHSZ areas could exacerbate wildfire risk, particularly the installation of electrical utilities, due to the high fire-ignition potential of electricity and the highly flammable nature of materials used during construction. Whole site modernization projects are not anticipated to require new or extended roadways or other similar infrastructure.

The Proposed Program would be required to comply with all applicable CBC and CFC requirements for development in a Very High FHSZ, including, but not limited to, specific requirements for structural hardening, water supply and flow, hydrant and standpipe spacing, signage, and fire department access. The construction process of installing overhead or underground electric utilities may temporarily increase the risk of fire ignition due to the type of materials and equipment used during the process, as well as the high fire risk of electricity in general. Electric utility construction would be conducted by qualified technicians (SDG&E personnel) who would implement proper safety procedures required by the CPUC, and the structures to which these utilities would supply electricity would be required to be built in accordance with CBC requirements. However, due to the unknown utility needs of future whole site modernization projects, it is possible the construction or extension of utilities associated with these project categories would exacerbate the existing wildfire risk at the site if located in Very High FHSZs. Therefore, implementation of the Proposed Program may include construction of infrastructure that would exacerbate wildfire risk or result in additional temporary or permanent impacts on the environment (**Impact-WF-7**).

Implementation of **MM-WF-1** would be required, which would ensure preparation of a CFPP to mitigate the risk of wildfire impacts related to utility construction. However, because the types of infrastructure needed at whole site modernization projects are unknown, it cannot be assured that **MM-WF-1** would reduce potential impacts (**Impact-WF-7**) related to exacerbating wildfire risk or resulting in temporary or permanent environmental impacts to a less-than-significant level. The impact would be significant and unavoidable.

#### *Operation*

Operation of whole site modernization projects would continue consistent with current conditions because the Proposed Program would not result in an increase in student capacity or staff at these sites. Operation of existing District properties would not require the ongoing installation of infrastructure for fire protection, or ongoing maintenance of said infrastructure. The existing District school sites would continue to comply with existing regulations, including the CFC and OSH Act, and would comply with the oversight of the State Fire Marshall and the SDFD. Therefore, future projects located at existing school sites either within, adjacent to, or outside of Very High FHSZs would not result in environmental impacts due to installation or maintenance of infrastructure for fire protection. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-WF-7: Exacerbate Wildfire Risk from the Installation of New Infrastructure During Construction of Whole Site Modernization Projects.** Construction activities associated with whole site modernization projects may require the installation of new or extended utilities in Very High Fire Hazard Severity Zones, which could exacerbate the wildfire risk to the students and staff at these project sites during construction. Impacts would be potentially significant.

#### *Operation*

Operations of whole site modernization projects would not exacerbate fire risk or result in temporary or ongoing impacts on the environment due to installation or maintenance of infrastructure. Impacts would be less than significant.

### Mitigation Measures

For **Impact-WF-7:**

Implement **MM-WF-1**, as described above.

### Level of Significance After Mitigation

#### *Construction*

**MM-WF-1** would ensure preparation of a CFPP to mitigate the risk of wildfire impacts related to utility construction. However, because the types of infrastructure needed at whole site modernization projects are unknown, it cannot be assured that **MM-WF-1** would reduce potential impacts (**Impact-WF-7**) related to exacerbating wildfire risk or resulting in temporary or permanent environmental impacts to a less-than-significant level. The impact would be significant and unavoidable.

#### *Operation*

Operation of whole site modernization projects would continue consistent with current conditions because the Proposed Program would not result in an increase in capacity at these sites. Operation of existing District properties would not require the ongoing installation of infrastructure for fire protection, or ongoing maintenance of said infrastructure. The existing District school would continue to comply with existing regulations, including the CFC and OSH Act, and comply with the oversight of the State Fire Marshall and the SDFD. Therefore, future projects located at existing schools either within, adjacent to, or outside of Very High FHSZs would not result in environmental impacts due to installation or maintenance of infrastructure for fire protection. Impacts would be less than significant.

## Upgrades of Existing School and Administrative Sites, and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program

### Impact Discussion

#### *Construction*

Upgrades of existing school and administrative sites, and joint-use facilities development projects would consist of minimal ground-disturbing activities. Construction activities would not 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. Upgrades would generally entail improvements to existing structures and equipment onsite for modernization purposes, and any utility improvements would likely be in kind and in place replacements of existing utilities. Joint-use facilities development projects would involve minor trenching for the installation of water lines for irrigation; however, no other infrastructure improvements are anticipated for this project category. For these reasons, impacts on the environment resulting from installation and maintenance of infrastructure would be less than significant.

#### *Operation*

Operations following upgrades of existing school and administrative sites, and joint-use facilities development would continue consistent with current conditions because the Proposed Program would not result in an increase in capacity at these sites. Operation of existing District properties would not require the ongoing installation of infrastructure for fire protection, or ongoing maintenance of said infrastructure. The existing District school and administrative sites would continue to comply with existing regulations, including the CFC and OSH Act, and comply with the oversight of the State Fire Marshall and the SDFD. Therefore, future projects located at existing school and administrative sites either within, adjacent to, or outside of Very High FHSZs would not result in environmental impacts due to installation or maintenance of infrastructure for fire protection. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites or joint-use facilities development would not exacerbate wildfire risk or result in temporary or ongoing impacts on the environment due to the installation or maintenance of infrastructure. Impacts would be less than significant.

#### *Operation*

Operations following upgrades of existing school and administrative sites or joint-use facilities development would not exacerbate fire risk or result in temporary or ongoing impacts on the environment due to installation or maintenance of infrastructure. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

#### *Construction*

Construction activities associated with upgrades of existing school and administrative sites or joint-use facilities development would not exacerbate wildfire risk or result in temporary or ongoing impacts on the environment due to the installation or maintenance of infrastructure. Impacts would be less than significant.

#### *Operation*

Operations following upgrades of existing school and administrative sites or joint-use facilities development would not exacerbate fire risk or result in temporary or ongoing impacts on the environment due to installation or maintenance of infrastructure. Impacts would be less than significant.

## Site-Specific Analysis

### Impact Discussion

#### Construction

Near-term, site-specific whole site modernization projects at the three schools located in Very High FHSZs—Kearny High School, Perry Elementary School, and Roosevelt Middle School (Table 4.16-4)—may require the relocation or modification of existing utilities and other infrastructure onsite, including electricity, water, sewer, and telecommunications. The construction of such utility upgrades in Very High FHSZs could exacerbate wildfire risk, especially electrical utilities, due to the high fire ignition potential electrical lines and other highly flammable materials used during construction. The near-term, site-specific whole site modernization projects would be required to comply with all applicable CBC and CFC requirements, including, but not limited to, specific requirements for structural hardening, water supply and flow, hydrant and standpipe spacing, signage, and fire department access. Additionally, installation of electric facilities would be conducted by the utility provider (SDG&E), which would conduct work with proper safety procedures and fire prevention best management practices required by the CPUC. However, due to the unknown utility needs of these projects, it is possible the construction or extension of utilities associated with the three schools located in Very High FHSZs would exacerbate the existing wildfire risk at the site. Therefore, implementation of the near-term, site-specific whole site modernization projects may include construction of infrastructure that would exacerbate wildfire risk or result in additional temporary or permanent impacts on the environment (**Impact-WF-8**).

Implementation of **MM-WF-1** would be required, which would ensure preparation of a CFPP to mitigate the risk of wildfire impacts related to utility construction. Therefore, **MM-WF-1** would reduce **Impact-WF-8** to a less-than-significant level.

#### Operation

Operation of near-term, site-specific whole site modernization projects would not require the installation of new infrastructure once the projects have been completed. These schools would be served by existing public utilities (see Section 4.15) and would not require fire protection infrastructure such as fire breaks or emergency water sources. Operation of these schools would continue as they currently do because the implementation of the near-term, site-specific whole site

modernization projects would not result in an increase in student capacity. Therefore, impacts would be less than significant.

## Level of Significance Prior to Mitigation

### Construction

**Impact-WF-8: Exacerbate Wildfire Risk from the Installation of New Infrastructure.** Near-term, site-specific whole site modernization projects at Kearny High School, Perry Elementary School, and Roosevelt Middle School may require the installation of relocated or upgraded utilities or other infrastructure, which could exacerbate the wildfire risk to the students and staff at these project sites during construction due to their location within a Very High Fire Hazard Severity Zone. Impacts would be potentially significant.

### Operation

Operation of the near-term, site-specific whole site modernization projects would not exacerbate wildfire risk or result in temporary or ongoing impacts on the environment due to installation or maintenance of infrastructure. Impacts would be less than significant.

## Mitigation Measures

For **Impact-WF-8:**

Implement **MM-WF-1**, as described above.

## Level of Significance After Mitigation

### Construction

**MM-WF-1** would ensure preparation of a CFPP to mitigate the risk of wildfire impacts related to utility construction. Therefore, **MM-WF-1** would reduce **Impact-WF-8** to a less-than-significant level.

### Operation

Operation of the near-term, site-specific whole site modernization projects would not exacerbate wildfire risk or result in temporary or ongoing impacts on the environment due to installation or maintenance of infrastructure. Impacts would be less than significant.

***Threshold 5: Would the Proposed Program be located in or near state responsibility areas or lands classified as Very High FHSZ, and 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?***

# Program-Level Analysis

## New Acquisition and New School or Administrative Facilities

### Impact Discussion

#### *Construction*

Wildfires can greatly reduce the amount of vegetation from hillsides. Plant roots stabilize the soil and aboveground plant parts slow water, allowing it to percolate into the soil. Removal of surface vegetation resulting from a wildfire reduces the ability of the soil surface to absorb rainwater and can allow for increased runoff that may include large amounts of debris. If hydrophobic conditions exist post-fire, the rate of surface water runoff is increased as water percolation into the soil is reduced (Moench and Fusaro 2012). The potential for surface runoff and debris flows therefore increases significantly for areas recently burned by large wildfires. According to the U.S. Geological Survey, fast moving and highly destructive debris flows triggered by intense rainfall are considered one of the most dangerous post-wildfire hazards (USGS 2018). Slope failures, mudflows, and landslides are common in areas where steep hillsides and embankments are present, and such conditions would be exacerbated in a post-fire environment where vegetative cover has been removed. These hazards pose a risk to life and property due to their sudden occurrence, extreme force, and ability to strip vegetation, block drainages, and damage infrastructure. The U.S. Geological Survey further notes that post-wildfire flooding and runoff may continue for several years in burn areas; however, the greatest risk of debris flow happens during the first post-fire storm season (USGS 2018).

As discussed in Section 4.9, *Hydrology and Water Quality,* there are areas within the District that are located adjacent to a flood zone (as identified by the Federal Emergency Management Agency's Flood Insurance Rate Maps; see Figure 4.9-1) that could experience flood conditions during large storm events made more severe by runoff caused by post-fire conditions. New site acquisitions and new school or administrative facilities may be located within both Very High FHSZ areas and mapped flood zone areas. In addition, future new sites at the base of slopes or canyons could experience increased runoff and drainage changes that could result in downhill flood conditions due to post-fire hill instability. Therefore, new acquisitions and the construction of new school or administrative facilities located in both Very High FHSZs and flood zones or other flood-prone areas could expose workers and property to additional flood risk from post-fire flooding due to increased runoff or altered drainage.

There are areas within the District that are mapped as having a high potential for landslides or being landslide-prone (see Figures 4.6-18 through 4.6-33 in Section 4.6). California Code of Regulations Title 5, Section 14010 stipulates school sites may not be located on areas subject to moderate to high landslides. Before new sites are acquired or construction begins on new school or administrative facilities, the District is required under Title 5 to have a geotechnical evaluation completed on the site to ensure the site is not subject to a moderate to high probability of landslides.

However, because the locations of new school or administrative facilities are currently unknown, even if they are not located on areas known to be subject to landslides, they may still be located at the base of slopes or hills with high susceptibility to landslides, or other areas prone to post-landslide conditions, and construction activities may put workers, property, and structures at risk of damage from post-fire landslides or slope instability. The Proposed Program would be required to comply with the District's *Architects Professional Services Manual*, the District's Standard Construction Specifications, the CBC, DSA requirements, and the standards outlined in the Education Code Sections 17251 and 32280 through 32289, which would ensure the structures are built to the required standard to protect from damage or collapse due to geologic hazards. However, wildfires could exacerbate conditions of slope instability or flood because wildfires destroy vegetation and change soil conditions, which could expose people or structures to pose-fire hazards regardless of whether geologic hazards are addressed during project design. Because the locations of specific sites are unknown at the time of this PEIR, acquiring new sites or the construction of new school or administrative facilities that are located in both Very High FHSZs and areas prone to landslides or slope instability could expose workers, structures, and property to significant risks related to post-fire conditions.

Therefore, new acquisitions and the construction of new school or administrative facilities in Very High FHSZs that are also areas prone to flood, landslide, or slope instability would have the potential to 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 (**Impact-WF-9**).

Implementation of **MM-WF-1** would require the preparation of a CFPP during construction activities to reduce the potential to exacerbate wildfire risks. The CFPP would include safety measures that would reduce potential wildfire risks to construction workers onsite; however, because the locations of future new acquisitions and new school or administrative facilities projects are not known, the potential post-fire hazards at the site are also unknown. Thus, it cannot be assured that **MM-WF-1** would reduce the impact to less-than-significant levels, and **Impact-WF-9** would remain significant and unavoidable.

***Operation***

The locations of new acquisitions and new school or administrative facilities could be within a Very High FHSZ and an area prone to flood, landslide, or slope instability. The operation of these new facilities could introduce new staff, students, faculty, and structures into an area highly susceptible to landslides or slope instability after a wildfire event. Therefore, operating a new facility in these areas would be exacerbating the existing risk of post-fire hazard by exposing additional people to this existing hazard. Because the locations are unknown, there is a potential for new acquisitions and new school or administrative facilities to result in a significant impact related to post-fire hazards (**Impact-WF-10**).

Implementation of **MM-WF-2** would be required, which would ensure that the District would prepare an FPP to mitigate the risk of wildfire impacts related to operation of new school or administrative facilities in Very High FHSZs. However, because the locations are unknown, the potential post-fire hazards at new acquisitions and new school or administrative facilities cannot be known. Thus, it cannot be assured that **MM-WF-2** would reduce the impact to less-than-significant levels, and **Impact-WF-10** would remain significant and unavoidable.

### Level of Significance Prior to Mitigation

#### *Construction*

**Impact-WF-9: Expose People or Structures to Significant Risks from Post-Fire Hazards During Construction.** New acquisition and new school or administrative facilities projects could exacerbate risks to life and property by placing workers and structures in areas prone to wildfire and susceptible to post-fire hazards. Impacts would be potentially significant.

#### *Operation*

**Impact-WF-10: Expose People or Structures to Significant Risks from Post-Fire Hazards During Operation.** The operation of new acquisition and new school or administrative facilities projects could exacerbate risks to life and property by placing students, staff, and structures in areas prone to wildfire and susceptible to post-fire hazards. Impacts would be potentially significant.

### Mitigation Measures

For **Impact-WF-9:**

Implement **MM-WF-1**, as described above.

For **Impact-WF-10:**

Implement **MM-WF-2**, as described above.

### Level of Significance After Mitigation

#### *Construction*

**MM-WF-1** would require the preparation of a CFPP during construction activities to reduce the potential to exacerbate wildfire risks. The CFPP would include safety measures that would reduce potential wildfire risks to construction workers onsite; however, because the locations of future new acquisitions and new school or administrative facilities projects are not known, the potential post-fire hazards at the site are also unknown. Thus, it cannot be assured that **MM-WF-1** would reduce the impact to less-than-significant levels, and **Impact-WF-9** would remain significant and unavoidable.

#### *Operation*

**MM-WF-2** would ensure that the District will prepare an FPP to mitigate the risk of wildfire impacts related to operation of a new school and/or administrative facilities in Very High FHSZs. However, because the locations of new acquisitions and new school or administrative facilities projects are not known, the potential post-fire hazards at the sites cannot be known. Thus, it cannot be assured that **MM-WF-2** would reduce the impact to less-than-significant levels, and **Impact-WF-10** would remain significant and unavoidable.

## All Other Project Categories

### Impact Discussion

#### *Construction*

Whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities projects could occur in areas identified both as Very High FHSZs and areas that are flood-prone or landslide-prone. However, these project categories would not increase capacity or alter the onsite conditions such that they would exacerbate the risk to students, staff, or property from due to post-fire conditions. Construction of these project categories would be conducted in compliance with District's *Architects Professional Services Manual*, the District's Standard Construction Specifications, the CBC, DSA requirements, and California Department of Education standards to ensure all structures or improvements are up to the required standard to prevent the loss or damage of structure or occupants. Construction activities may introduce construction workers to an area with existing flood or landslide risks due to post-fire conditions; however this would be temporary. As mentioned above, these project categories would not increase capacity of these sites and, thus, would not permanently increase students or staff on these sites. Therefore, these project categories would not exacerbate existing conditions that would expose additional people to risks associated with post-fire flooding or landslides, and impacts would be less than significant.

#### *Operation*

Whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities projects could occur in areas identified as Very High FHSZs as well as areas that are flood-prone or landslide-prone. However, these project categories would not increase capacity or alter the onsite conditions during operations. Therefore, these project categories would not exacerbate existing conditions that would expose additional people to risks associated with post-fire flooding or landslides. Impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### *Construction*

Construction associated with whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities development would not have the potential to expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes during construction. Impacts would be less than significant.

#### *Operation*

Operation associated with whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities development would not have the potential to 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 during operation. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

#### Level of Significance After Mitigation

##### *Construction*

Construction associated with whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities development would not have the potential to expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes during construction. Impacts would be less than significant.

##### *Operation*

Operation associated with whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities development would not have the potential to 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 during operation. Impacts would be less than significant.

## Site-Specific Analysis

### Impact Discussion

#### Construction and Operation

Near-term, site-specific whole site modernization projects that would occur at the three schools located partially or entirely within a Very High FHSZ (see Table 4.16-4) may also be located in areas identified as flood-prone or landslide-prone. These areas are at a higher risk of increased erosion and runoff, or slope instability, due to post-fire conditions. However, these near-term, site-specific whole site modernization projects would not increase capacity or alter the onsite conditions such that they would exacerbate the existing risk of post-fire hazards by introducing additional students or staff to the site. Therefore, near-term, site-specific whole site modernization projects would not exacerbate existing conditions that would expose additional people to risks associated with post-fire hazards such as flooding or landslides; and impacts would be less than significant.

### Level of Significance Prior to Mitigation

#### Construction and Operation

Near-term, site-specific whole site modernization projects would not have the potential to expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes during construction or operation. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

### Construction and Operation

Near-term, site-specific whole site modernization projects would not have the potential to expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes during construction or operation. Impacts would be less than significant.

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# Chapter 5
# Cumulative Impacts

This chapter considers the cumulative effects of past, present, and reasonably foreseeable future projects, and examines the Proposed Program's contribution to these effects. *Past projects* are defined as those that were recently completed and are now operational. *Present projects* are those under construction but not yet operational. *Reasonably foreseeable future projects* are those for which a development application has been submitted or credible information is available to suggest that project development is a probable outcome at the time the Notice of Preparation was issued (October 5, 2018).

Cumulative impacts, as opposed to project-level impacts, are impacts on the physical environment that result from the incremental effects of the Proposed Program when added to other past, present, and reasonably foreseeable future projects. The intent of this cumulative impacts discussion, as required by Section 15130 of the State CEQA Guidelines, is to account for any impact that may not be significant when considering the project on its own, but that may be part of a larger regional trend or that may combine with similar impacts of other projects, that would be significant when considered together.

## 5.1 Cumulative Methodology

### 5.1.1 Scope of Analysis

According to Section 15130(b) of the State CEQA Guidelines, a cumulative impact analysis may be conducted using one of two methods: the *List Method*, which includes "a list of past, present, and probable activities producing related or cumulative impacts," or the *Plan Method*, which uses "a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact." Because the Proposed Program involves the establishment and implementation of the District's Capital Improvement Program to repair, renovate, and revitalize District school and administrative facilities, the cumulative analysis for all issue areas addressed in this PEIR utilizes the Plan Method, supplemented by plans or programs recently adopted or currently in the planning phase. Due to the location of District facilities, which serve regional populations, utilization of the Plan Method is appropriate.

Near-term, site-specific whole site modernization projects associated with the Proposed Program would be implemented at 21 school sites, as identified in Chapter 3, *Project Description*. The cumulative analysis for the Proposed Program assumes buildout of the Program, which includes the site-specific projects analyzed through this PEIR.

### 5.1.2 Application of the Plan Method

The Plan Method uses "a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified,

which described or evaluated regional or area wide conditions contributing to the cumulative impact." In the San Diego region, the San Diego Association of Governments (SANDAG) serves as the regional transportation planning agency responsible for forecasting the region's population growth. These growth projections serve as the foundation for regional planning documents such as water supply management plans and general plans, and provide the basis for determining housing, infrastructure, and transportation needs across the San Diego region. On October 13, 2013, the Series 13: 2050 Regional Growth Forecast was accepted by the SANDAG Board of Directors for planning purposes. The Series 13 Regional Growth Forecast represents a combination of economic and demographic projections, existing land use plans and policies, and potential land use plan changes that may occur in the region between 2030 and 2050. According to the Series 13 forecast, SANDAG projects the region's population will grow by approximately 710,000 people by 2035 and nearly 1,000,000 people by 2050 (SANDAG 2013). The growth in population will drive job growth and housing demand within the region, adding nearly 500,000 jobs and more than 330,000 housing units by 2050.

Since the Series 13 Regional Growth Forecast was adopted in 2013, multiple additional regionally significant plans and programs have been adopted or are currently in the planning phase, and therefore were not included in the data used to prepare the growth forecast. Table 5-1 lists these plans and programs.

**Table 5-1. Cumulative Plans and Programs**

| # | Plan/Program Name | Agency | Description | Status |
|---|---|---|---|---|
| 1 | Midway-Pacific Highway Community Plan Update | City of San Diego | The project involved a comprehensive update to the Midway-Pacific Highway Community Corridor Plan to guide development through 2035. The update included changes to public and private land uses, local streets and the transit network, provision of parks and public facilities, urban design guidelines, and recommendations to preserve and enhance historic and cultural resources within the community. | Approved in September 2018 |
| 2 | Old Town San Diego Community Plan Update | City of San Diego | The project involved a comprehensive update to the 1987 Old Town San Diego Community Plan to guide development through 2035. The update included changes to public and private land uses, local streets and the transit network, provision of public facilities, architectural and urban design guidelines, and recommendations to preserve and enhance natural open space and historic and cultural resources within the community. | Approved in October 2018 |

| # | Plan/Program Name | Agency | Description | Status |
|---|---|---|---|---|
| 3 | Mission Valley Community Plan Update | City of San Diego | The project involved a comprehensive update to the 1985 Mission Valley Community Plan. The update provided a vision for the community and identifies how the City and development community will implement that vision, through implementing actions, design guidelines, and policies for development. | Adopted 2020 |
| 4 | Barrio Logan Community Plan Update | City of San Diego | The project involves a comprehensive update to the 1978 Barrio Logan Community Plan. As part of the Barrio Logan Community Plan (2013 Draft) update process, the Barrio Logan Public Facilities Financing Plan and Final Programmatic Environmental Impact Report (PEIR) and Technical Studies were adopted by City Council on September 17, 2013. In 2014, the Community Plan and associated ordinances were rescinded by a referendary petition and a Citywide vote. The current Community Plan for the Barrio Logan community is the 1978 Barrio Logan Community Plan. | Currently being updated |
| 5 | Clairemont Mesa Community Plan Update | City of San Diego | The project involves a comprehensive update to the 1989 Clairemont Community Plan. The update provides a vision to include policies and actions to foster a mixed-use, transit-oriented, and pedestrian-friendly Clairemont community; promote additional housing to accommodate a diverse range of household sizes and incomes; and preserve and provide additional open spaces. | Currently being updated |
| 6 | Encanto Community Plan | City of San Diego | The project involved a revision of the previous Southeastern San Diego Community Plan, which included Encanto Neighborhoods. The Southeastern San Diego Community Plan was originally adopted in 1969, was comprehensively updated in 1987, and has undergone several amendments. The update provided a guide to growth and development within the Encanto Neighborhoods. | Adopted 2015 |
| 7 | Greater Golden Hill | City of San Diego | The project involved a comprehensive update to the 1988 Golden Hill Community Plan. The update provided a statement of development policies intended to inform land use, development form, and public resource decisions within this planning area. | Adopted 2015 |

| # | Plan/Program Name | Agency | Description | Status |
|---|---|---|---|---|
| 8 | Kearny Mesa Community Plan | City of San Diego | The project involves a comprehensive update to the 1992 Kearny Mesa Community Plan. The update provides a roadmap to guide the future growth of the community for the next 20 years. | Currently being updated |
| 9 | Mira Mesa Community Plan Update | City of San Diego | The project involves a comprehensive update to the 1992 Mira Mesa Community Plan. The update will take into account current conditions, Citywide goals in the Climate Action Plan and the General Plan, and community-specific goals to provide direction for the long-term development of the community. | Currently being updated |
| 10 | Mission Valley Community Plan Update | City of San Diego | The project involved a comprehensive update to the 1985 Mission Valley Community Plan. The update provided a vision for the future of the community upfront; provided implementing actions that the City can take to help achieve the vision; and offers design guidelines and policies to direct new development on how to improve quality of life for residents, employees, property owners, business owners, and visitors of Mission Valley in the future. | Adopted 2019 |
| 11 | North Park Community Plan | City of San Diego | The project involved a comprehensive update to the 1986 Greater North Park Community Plan. The update provided specific goals and recommendations regarding the use and development of land over 20 to 30 years and addressed mobility, economic prosperity, public facilities, conservation, open space, and recreation. | Adopted 2016 |
| 12 | Ocean Beach Community Plan | City of San Diego | The project involved a comprehensive update to the 1975 Ocean Beach Precise Plan and Local Coastal Program Addendum. The update provided a plan to further express General Plan policies in Ocean Beach through the provision of site-specific recommendations that implement the City of Villages strategy. | Adopted 2015 |
| 13 | Southeastern San Diego Community Plan | City of San Diego | The project involved a comprehensive update to the 1987 Southeastern San Diego Community Plan. The update provided a vision to guide growth and development within southern San Diego. | Adopted 2015, Last Amended 2016 |

| # | Plan/Program Name | Agency | Description | Status |
|---|---|---|---|---|
| 14 | University Community Plan | City of San Diego | The project involves a comprehensive update to the 1987 University Community Plan. The updated Community Plan will consider current conditions, Citywide goals in the Climate Action Plan and the General Plan, and community-specific goals to provide direction for the long-term development of the community. | Currently being updated |
| 15 | 2021 Regional Plan | San Diego Association of Governments | The project involves an update to the current Regional Plan, which is required to be updated every 4 years pursuant to state and federal law. When adopted, the 2021 Regional Plan will include a new Regional Transportation Plan, Regional Comprehensive Plan, and Sustainable Communities Strategy for the San Diego region. | Currently being updated |

# 5.2 Cumulative Impact Analysis

The following discussion evaluates the potential for the Proposed Program to contribute to a cumulative adverse impact on the environment. For each resource area, an introductory statement is made regarding what would signify significant cumulative impact in a particular resource area.

The analysis considers two separate impacts: the significance of the cumulative effect from past, present, and reasonably foreseeable projects; and, in the event a cumulative effect is identified, the Proposed Program's incremental contribution to the identified cumulative effect. If it is determined that the Proposed Program's contribution to the cumulative effect is considerable, *a cumulatively significant impact* is identified, and mitigation is imposed.

Based on the existing conditions present at the District facilities and a review of the Proposed Program, it was determined and discussed in Chapter 6, *Additional Considerations,* that implementation of the Proposed Program would not result in significant impacts on agriculture and forestry resources, mineral resources, land use and planning, population and housing, or public services, as well as for specific thresholds under geology and soils, and hazards and hazardous materials. Consequently, the Proposed Program would not have a potential to contribute to cumulative impacts related to these resources areas, and they are not discussed in the analysis below.

The cumulative analysis addresses the incremental contribution of the Proposed Program to cumulative impacts associated with aesthetics, air quality and health risk, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise and vibration, paleontological resources, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire.

## 5.2.1 Aesthetics

A cumulatively considerable impact on aesthetics and visual resources would occur if the Proposed Program would, in combination with buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1, contribute to a cumulatively considerable adverse effect on a scenic vista, degradation of the existing visual character or quality of the site and its surroundings, or the amount of light and/or glare.

### 5.2.1.1 Geographic Scope

The geographic scope for cumulative aesthetics and visual resources impacts includes the areas within the vicinity of view corridors, viewsheds, or scenic resources identified in the community plans within the City of San Diego.

### 5.2.1.2 Cumulative Effects

Past development projects have changed the land in the City of the San Diego and surrounding area from a natural and undeveloped setting to the urban setting. In addition, past projects, along with present and future projects, have included, and will continue to include development that has cumulatively contributed to adverse effects on scenic views and vistas. However, these cumulative projects have been, and will continue to be, generally consistent with the visual character, size, scale, and bulk of the past development projects due to existing design and viewshed regulations provided in the City of San Diego's Land Development Code. Compliance with these applicable plans and regulations would also limit future glare and light impacts.

Therefore, although cumulative projects have continued to change the San Diego area to more urbanized settings, and reasonably foreseeable future projects would continue this path of development, changes from past, present, and reasonably foreseeable future projects have been, and will continue to be, designed in accordance with the existing viewshed regulations and design guidelines. Consequently, a cumulatively significant impact from past, present, and reasonably foreseeable future projects is not present.

### 5.2.1.3 Program Contribution

Existing District facilities are potentially located within the viewsheds of designated scenic vantage points, and future development occurring under the Proposed Program would have the potential to be located within the viewsheds of existing or future designated scenic vistas. Additionally, new structures within the viewshed of a scenic vista would have the potential to intrude into or substantially detract from a scenic vista, or if building height or massing increases with new additions or other new features associated with the Proposed Program. Implementation of **MM-AES-1** would help reduce the visibility of construction activities within the viewshed of a scenic vista because it would shield grading activities and most construction equipment from view. However, because the prominence of any newly acquired site and the extent of construction activities within a scenic viewshed are not known at this time, it cannot be concluded that **MM-AES-1** would be able to completely mitigate this impact to less-than-significant levels.

Implementation of **MM-AES-2** would reduce impacts on scenic vistas from development of a new school or administrative facility because it would ensure that new school or administrative facilities would be designed to avoid placing visibly prominent features within the viewshed of a scenic vista

or would minimize—through building design, finishing materials, or landscaping—the presence of visually prominent features. In addition, implementation of **MM-AES-3** would minimize the prominence of new development within a scenic vista and reduce impacts on scenic vistas related to whole site modernization projects. However, specific sites and site plans are not known at this time, and because site constraints or project specifications may reduce flexibility related to site plans or building design, even with mitigation, the potential still exists for new school or administrative facilities to adversely affect a scenic vista. Therefore, impacts would remain significant and unavoidable at the program-level, as described in Section 4.1, *Aesthetics*.

Implementation of the Proposed Program would not have a substantial adverse effect on an existing officially designated scenic vista; however, because new highway segments are added to the state scenic highway program on a periodic basis and because the Proposed Program has a horizon year of approximately 2030, it is possible that future projects occurring under implementation of the Proposed Program could be constructed within the viewshed of an officially designated state scenic highway and the Proposed Program could result in significant impacts on scenic resources within a state scenic highway. Implementation of **MM-AES-4** would help reduce impacts on scenic resources resulting from the construction of a new school or administrative facility. However, because specific sites are not known at this time and site or project constraints may require removal of a scenic resource, it cannot be concluded that **MM-AES-4** would be able to completely mitigate this impact to less-than-significant levels. Therefore, impacts would remain significant and unavoidable at the program-level. In addition, during construction, implementation of the Proposed Program has the potential to result in the temporary degradation of visual character. However, these potential significant direct project impacts would be reduced to less-than-significant levels with the implementation of **MM-AES-1.**

Operation of the Proposed Program, particularly new or renovated high schools with athletic fields, would have the potential to result in a substantial increase of nighttime lighting caused by the addition of athletic field lighting for nighttime outdoor athletic activities. Therefore, the Proposed Project would result in a potentially significant impacts related to light and glare. Implementation of **MM-AES-5** would help reduce impacts related to new athletic field lighting, but, because specific locations for site acquisitions and site plans for new school facilities are not known at this time, the degree of lighting impacts on nearby residences cannot be quantified at this time. Therefore, impacts would remain significant and unavoidable, as described in Section 4.1.

However, as noted above, a cumulatively significant impact from past, present, and reasonably foreseeable projects is not present. Therefore, the Proposed Program's contribution to an impact on scenic vistas would be less than cumulatively considerable.

### 5.2.1.4 Level of Significance Prior to Mitigation

The Proposed Program's contribution to a cumulative aesthetics and visual resources impact would be less than cumulatively considerable.

### 5.2.1.5 Mitigation Measures

No mitigation is required.

### 5.2.1.6 Level of Significance After Mitigation

The Proposed Program's incremental contribution to cumulative aesthetics and visual resources impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

## 5.2.2 Air Quality and Health Risk

Potential cumulative air quality impacts would result when the cumulative plans' emissions would combine to degrade air quality conditions below attainment levels for the San Diego Air Basin (SDAB), delay attainment of air quality standards, affect sensitive receptors, or subject surrounding areas to objectionable odors. Neither the District nor the City of San Diego has established quantitative thresholds to determine whether a project's incremental contribution to emissions would be cumulatively considerable. Therefore, the Air Quality Impact Analysis (AQIA) Trigger Levels outlined in San Diego Air Pollution Control District's (SDAPCD's) Regulation II, Rules 20.2 and 20.3, for new or modified sources, and the County of San Diego's screening level thresholds (SLTs), are used for the analysis of impacts related to emissions for Proposed Program construction and operations evaluated within the context of buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1. The substantial evidence for using the County's and SDAPCD's threshold levels for this project is contained within Section 4.2, *Air Quality and Health Risk*, under Section 4.2.4.2, *Thresholds of Significance*, of this Draft PEIR.

### 5.2.2.1 Geographic Scope

The SDAB, which covers 4,260 square miles of Southern California and is contiguous with San Diego County, represents the cumulative geographic scope for air quality impacts related to consistency with air quality plans and air quality threshold levels because plans and thresholds are established at the air basin-wide level to attain air quality standards that are assigned for the entire air basin, which in this case is the entire county. Cumulative impacts on sensitive receptors and odors are considered at a more localized level due to the more limited area of dispersion, and include the surrounding neighborhoods and areas close to the source of the emission and odor sources, respectively. Localized air quality conditions are influenced by a variety of sources, and several lead agencies, including the Bay Area Air Quality Management District (2017) and the California Air Resources Board (CARB) (2005), recommend analyzing the effects of emissions from sources within 1,000 feet of proposed new emission sources or proposed new receptor locations.

### 5.2.2.2 Cumulative Effects

Past projects within the SDAB have involved the emissions of ozone precursors (reactive organic gases [ROG] or volatile organic compounds [VOC] and nitrogen oxides [$NO_X$]), particulate matter 10 microns or less in diameter (PM10), and particulate matter 2.5 microns or less in diameter (PM2.5), resulting in nonattainment status for 8-hour ozone under National Ambient Air Quality Standards (NAAQS) and nonattainment status for ozone, PM10, and PM2.5 under California Ambient Air Quality Standards (CAAQS). Therefore, the emissions of concern within the SDAB are ozone precursors (ROG and $NO_X$), PM10, and PM2.5.

The nonattainment status for the entire county is a consequence of past and present projects; the cumulative contribution of development associated with reasonably foreseeable future plans, such as those listed in Table 5-1, could result in continued nonattainment.

Because past and present projects have resulted in the current nonattainment status for ozone (ROG and $NO_X$), PM10, and PM2.5, and reasonably foreseeable future projects would continue to contribute to the nonattainment status and potentially affect sensitive receptors, impacts related to the cumulative contribution of nonattainment pollutants (ozone precursors, PM10, and PM2.5) and the exposure of sensitive receptors to substantial pollutant concentrations would be considered cumulatively significant.

### 5.2.2.3 Program Contribution

As discussed under Threshold 1 of Section 4.2, the Proposed Program includes projects that could construct entirely new school or administrative facilities, resulting in new student capacity or employment at a new site. Though these projects would increase student and employee populations at new school or administrative facilities, they would generally be implemented to accommodate surrounding community growth and would not independently induce growth. As such, they are not anticipated to result in population or employment growth beyond what was projected in the applicable air quality plans. In addition, the Proposed Program would implement control measures consistent with the Regional Air Quality Standards (RAQS) and ozone State Implementation Plan (SIP) such as the use of low VOC architectural coatings. The Proposed Program would also install new and/or replace mechanical equipment (e.g., heating) with improved $NO_X$ controls. Consequently, the Propose Program would not conflict with or obstruct implementation of the RAQS or ozone SIP.

As discussed under Threshold 2 of Section 4.2, and presented in Tables 4.2-8 and 4.2-9, construction activities associated with the Proposed Program that exceed the screening criteria could result in emissions exceeding thresholds presented in Table 4.2-6. These emissions could contribute to ozone formation and other air pollution in the SDAB, which at certain concentrations can contribute to short- and long-term human health effects, resulting in a potentially significant impact on air quality. Implementation of **MM-AQ-1, MM-AQ-2** and **MM-AQ-3** would reduce construction emissions of the Proposed Program.

**MM-AQ-1** through **MM-AQ-3** require the use of at least Tier 4 engines and renewable diesel in off-road equipment and low-VOC paints. All projects, regardless of their emissions impact, would also be required to comply with SDAPCD Rule 55, which requires implementation of fugitive dust controls. Reductions achieved by these measures cannot currently be quantified because implementation of these mitigation measures is dependent on project type, although they can be required when applicable. Therefore, even with implementation of mitigation, emissions of VOC, $NO_X$, $SO_X$, CO, PM10 and PM2.5 exhaust may not be reduced to levels below the Proposed Program thresholds when multiple construction projects are concurrently ongoing. Accordingly, the effects from past, present, and reasonably foreseeable future plans are considered cumulatively significant, and the Proposed Program's incremental contribution from construction emissions would be cumulatively considerable (**Impact C-AQ-1**).

Additionally, as discussed under Threshold 2 of Section 4.2, individual projects (e.g., new schools) may still generate emissions in excess of the Proposed Program thresholds. Accordingly, operational activities associated with joint-use facilities that exceed the screening criteria presented in Table 4.2-12 could result in emissions exceeding thresholds presented in Table 4.2-6. These emissions could contribute to ozone formation and other air pollution in the SDAB, which at certain concentrations, can contribute to short- and long-term human health effects, resulting in a potentially significant impact on air quality. For projects occurring under the Proposed Program

that exceed the screening criteria presented in Table 4.2-11, or projects that are not consistent with the operational assumptions used in the development of the screening metrics presented in Tables 4.2-10 and Tables 4.2-11, implementation of **MM-AQ-4**, which promotes and requires the use of electrical landscaping equipment for joint-use fields would reduce area source $NO_X$ emissions and net increase $NO_X$ emissions to less-than-significant levels.

**MM-AQ-5**, which promotes and requires the use of green consumer products, including low-VOC paints, would reduce area source emissions to 520 pounds per day, resulting in a net increase of 164 pounds of ROG per day, indicating that full operation of existing academic uses would not result in significant ROG impacts. However, implementation of **MM-AQ-4** and **MM-AQ-5** may not reduce area source emissions for the Proposed Program. Reductions achieved by this measure cannot currently be quantified as implementation of these mitigation measures is dependent on project type, although they can be required when applicable. There is no additional feasible mitigation to reduce operational emissions beyond **MM-AQ-4** and **MM-AQ-5.** Therefore, even with mitigation, impacts would be significant and unavoidable**.** Accordingly, the effects from past, present, and reasonably foreseeable future plans are considered cumulatively significant, and the Proposed Program's incremental contribution from operation emissions would be cumulatively considerable (**Impact C-AQ-2**).

As discussed under Threshold 3 of Section 4.2, activities associated with the Proposed Program could result in emissions exceeding thresholds presented in Table 4.2-6, which could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the SDAB, which at certain concentrations, can contribute to short- and long-term human health effects. Construction activities associated with the Proposed Program (i.e., new school or administrative facilities, whole site modernizations, upgrades of existing school and administrative sites, joint-use facilities development) that do not meet the screening criteria presented in Tables 4.2-13 and 4.2-14 could result in toxic air contaminant emissions that exceed health risk thresholds. These emissions could contribute to ozone formation and other air pollution in the SDAB, which at certain concentrations can contribute to short- and long-term human health effects. Implementation of **MM-AQ-1** through **MM-AQ-5** would reduce health risks associated with criteria air pollutants, but the extent of the reductions is unknown. However, even with mitigation, ROG, $NO_X$, and PM emissions during construction and operation could exceed the District's thresholds. Accordingly, implementation of the Proposed Program could contribute a significant level of regional criteria pollutant emissions within the SDAB, which could increase receptor exposure to air pollution and resultant health effects. Therefore, the Proposed Program's incremental contribution to emissions would be cumulatively considerable (**Impact C-AQ-3**).

Implementation of **MM-AQ-1** and **MM-AQ-2** would reduce construction diesel particulate matter emissions for major construction projects that do not meet the health risk screening criteria for projects presented in Tables 4.2-13 and 4.2-14. However, the extent of the reductions is unknown. Therefore, after mitigation, this impact would be significant and unavoidable, and a project-specific emissions inventory and/or health risk assessment would be required for the project-level environmental analysis to determine project-specific health risks. Therefore, the Proposed Program's incremental contribution to emissions would be cumulatively considerable (**Impact C-AQ-4**).

As discussed under Threshold 4 of Section 4.2, operational activities associated with the Proposed Program could result in other emissions (such as those leading to odors) adversely affecting

a substantial number of people. With implementation of **MM-AQ-8**, new schools would not be constructed within 1,000 feet of existing odor generating facilities. and the Proposed Program's contribution to other emissions would be reduced to less than cumulatively considerable. Accordingly, while the effects from past, present, and reasonably foreseeable future plans are considered cumulatively significant, the Proposed Program's incremental contribution to cumulative emissions (such as odor) would be less than cumulatively considerable.

### 5.2.2.4 Level of Significance Prior to Mitigation

**Impact C-AQ-1: Potential to Result in a Cumulatively Considerable Net Increase of any Criteria Pollutant for Which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction.** Construction activities associated with the Proposed Program that do not meet the screening criteria presented in Table 4.2-7 could result in emissions exceeding thresholds presented in Table 4.2-6. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects, resulting in a potentially significant impact on air quality.

**Impact C-AQ-2: Potential to Result in a Cumulatively Considerable Net Increase of any Criteria Pollutant for Which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Operation.** Operational activities associated with joint-use facilities that exceed the screening criteria presented in Table 4.2-12 could result in emissions exceeding thresholds presented in Table 4.2-6. These emissions could contribute to ozone formation and other air pollution in the SDAB, which at certain concentrations, can contribute to short- and long-term human health effects, resulting in a potentially significant impact on air quality.

**Impact C-AQ-3: Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations.** Activities associated with the Proposed Program (i.e., new school or administrative facilities, whole site modernizations, upgrades of existing school and administrative sites, joint-use facilities development) could result in emissions exceeding thresholds presented in Table 4.2-6 that could expose sensitive receptors to substantial criteria pollutant concentrations. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

**Impact C-AQ-4: Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction.** Construction activities associated with the Proposed Program (i.e., new school or administrative facilities, whole site modernizations, upgrades of existing school and administrative sites, joint-use facilities development) that do not meet the screening criteria presented in Tables 4.2-13 and 4.2-14 could result in toxic air contaminant emissions that exceed health risk thresholds. These emissions could contribute to ozone formation and other air pollution in the San Diego Air Basin, which at certain concentrations can contribute to short- and long-term human health effects.

### 5.2.2.5 Mitigation Measures

For **Impact C-AQ-1:**

> Implement **MM AQ-1, MM-AQ-2**, and **MM-AQ-3** as described in Section 4.2, *Air Quality and Health Risk*)**.**

For **Impact C-AQ-2**:

Implement **MM AQ-4** and **MM-AQ-5,** as described in Section 4.2**.**

For **Impact C-AQ-3**:

Implement **MM-AQ-1** through **MM-AQ-5,** as described in Section 4.2**.**

For **Impact C-AQ-4**:

Implement **MM-AQ-1** through **MM-AQ-2,** as described in Section 4.2**.**

#### 5.2.2.6 Level of Significance After Mitigation

Implementation of mitigation measures would reduce construction emissions of the Proposed Program; however, because reductions achieved by these mitigation measures cannot be quantified since implementation of mitigation measures is dependent on project type. Therefore, emissions may not be reduced to less than significant levels and cumulative air quality impacts would remain cumulatively considerable and unavoidable.

### 5.2.3 Biological Resources

A significant cumulative impact on biological resources would result if the Proposed Program, in combination with buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1, would contribute to cumulative impacts related to sensitive habitat or species, sensitive habitat/natural communities, federally protected wetlands, or wildlife movement corridors.

#### 5.2.3.1 Geographic Scope

The geographic area for terrestrial biological resources that the Proposed Program may affect includes the surrounding District clusters and the City of San Diego. Development associated with present and reasonably foreseeable future plans that could contribute to cumulative impacts on biological resources include projects with grading, paving, landscaping, roads, and building construction on undeveloped land or with habitat otherwise present.

#### 5.2.3.2 Cumulative Effects

As shown in Table 5-1, the Program area and surrounding areas continue to see an increase in urban density and intensity from recent past and present projects, and future projects appear to continue the area's urbanization within the communities of San Diego and surrounding areas. The vast majority of sensitive terrestrial habitat in the Program area is no longer present. Present and future projects would be required to be consistent with the City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan, the City's Municipal Code Environmentally Sensitive Lands (ESL) Ordinance, and other local plans and policies. Moreover, present and reasonably foreseeable future projects also would comply with requirements of the Migratory Bird Treaty Act (MBTA), which contains regulations for the take of any migratory birds, including feathers, nests, or eggs, and would require that present and future projects avoid and/or mitigate potential impacts on any nesting birds.

Present and future projects do have the potential to further degrade water quality within the area and thus existing riparian or wetland habitats. However, specific regulations are in place that would

minimize continued degradation of the existing riparian and wetland habitat. For example, projects over 1 acre in size are required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) while projects less than 1 acre are still required to comply with the City of San Diego's and San Diego Unified Port District's stormwater ordinances, depending on the jurisdiction within which the project would be located. The SWPPP would identify short-term, project-specific best management practices (BMPs), which are described in Section 4.8, *Hydrology and Water Quality*, to minimize pollutants and/or sediments traveling via runoff; and long-term BMPs would be implemented based on the required Water Quality Control Plans using a combination of Site Design BMPs, Source Control BMPs, and Treatment Control BMPs. Implementation of both construction and operational BMPs would minimize harm to riparian and wetland habitat from water runoff.

Therefore, cumulative biological resource impacts from past, present, and future projects are considered less than cumulatively significant.

### 5.2.3.3 Program Contribution

As discussed under Threshold 1 of Section 4.3, *Biological Resources*, construction activities associated with the Proposed Program could involve significant clearing and grubbing, grading and excavation, filling and compaction, and other ground disturbance activities, which could adversely affect candidate, sensitive, or special-status plant and wildlife species in local or regional plans, policies, or regulations; or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Activities could directly affect sensitive species present through habitat modifications, including through permanent removal of suitable habitat. In addition, construction activities occurring under the Proposed Program were determined to have potential adverse impacts on protected wetlands, interference with migratory wildlife species, conflict with local policies and ordinance protecting biological resources, and conflict with the provisions of an adopted habitat conservation plan. These impacts could be potentially significant.

Implementation of **MM-BIO-1** would identify site-specific sensitive species and provide project-specific measures to reduce unanticipated impacts on sensitive species not already identified in this PEIR. **MM-BIO-2** requires further analysis, when necessary; limits light and noise pollution; and requires fencing to protect sensitive biological resources, surveys and monitoring for special status species, consultation with resource agencies, and compliance with the MBTA and California Fish and Game Code 3503 to prevent unauthorized take of active nests. **MM-BIO-3** requires compliance with the City's Multi-Habitat Planning Area Adjacency Guidelines, and **MM-BIO-4** requires a tree removal permit for construction of a non-educational facility. As discussed in Section 4.3, implementation of **MM-BIO-1** through **MM-BIO-4** would reduce impacts of the Proposed Program in regard to substantial adverse effects, either directly or through habitat modifications, on any sensitive species. Therefore, the Proposed Program, in combination with other cumulative plans, would not contribute to a potentially significant cumulative impact.

### 5.2.3.4 Level of Significance Prior to Mitigation

The Proposed Program's contribution to a cumulative biological resources impact would be less than cumulatively considerable.

### 5.2.3.5 Mitigation Measures

No mitigation is required.

### 5.2.3.6 Level of Significance After Mitigation

The Proposed Program's incremental contribution to cumulative biological resource impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

## 5.2.4 Cultural Resources

A significant cumulative impact on cultural resources would result if the Proposed Program, in combination with buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1, would contribute to cumulative impacts on significant historical resources, archaeological resources, and/or inadvertently discovered human remains.

### 5.2.4.1 Geographic Scope

The geographic scope of analysis for cumulative cultural resource impacts depends on the type of resource, but generally includes the Program area. For instance, historical and archaeological resources could be present within the surrounding artificial soils and fill. Impacts on buried archaeological resources generally occur from ground-disturbing activities, such as grading and dredging, while impacts on the historic built environment typically result from modification, relocation, and demolition of existing structures; visual impacts on the setting of a built environment resources; and/or noise impacts on the built environment resource.

### 5.2.4.2 Cumulative Effects

Past projects within the geographic scope have resulted in the urban development seen today. Like the Program area, plans identified in Table 5-1 in the surrounding area contain archaeological resources and known built environment historical resources. Past development in the City of San Diego and adjacent communities has resulted in impacts on cultural resources primarily due to ground-disturbing activities during construction. As redevelopment continues to occur within the Program area and surrounding communities, providing increased density and additional commercial opportunities for residents, existing structures that may be eligible for inclusion in the California Register of Historical Resources (CRHR) or for local designation could be demolished to create developable land, and excavation activities associated with new development could disturb archaeological resources. However, discretionary projects are required to undergo CEQA review, and, where there is a potential to affect cultural resources, CEQA (Sections 15064.5 and 15126.4(b)), the Health and Safety Code (Section 7050.5), National City's Land Use Code (Section 18.12.160, Historic Properties), and the City of San Diego's Land Development Code, Comprehensive Historic Preservation Plan, and Progress Guide and General Plan contain policies and regulations that pertain to cultural resources, and their protection, preservation, and/or avoidance. While present and reasonably foreseeable future plans would likely continue to discover buried cultural resources or seek to modify existing historic structures, existing regulations and plans would reduce the potential loss of cultural resources.

While individual projects mitigate the loss of historical resources through archival documentation, salvage, interpretive programs, or alteration in accordance with Secretary of the Interior standards, the cumulative effect is a continued decrease in the number and variety of historical resources in the region. Therefore, the effect of cumulative projects on historical resources is significant.

For archaeological resources, previous historical urban development without proper professional assessment and systematic collection of data has resulted in the loss of potentially significant scientific and cultural data. More recent development has been carried out under federal, state, and local regulations, with mitigation of significant impacts to such resources. However, because archaeological and paleontological resources are non-renewable resources, the direct and indirect impacts of past, present, and future projects are cumulatively significant.

### 5.2.4.3 Program Contribution

Buildout of the Proposed Program would potentially include reconstruction that could require demolition or physical alteration of existing buildings and other built environment resources over 45 years old, which could be eligible for listing in the CRHR. As discussed in Section 4.4, *Cultural Resources*, demolition or alteration of a CRHR-eligible building or complex would result in a substantial adverse change in the significance of a historical resource.

Implementation of **MM-CUL-1** would provide for identification of historical resources that may be affected within the Program area. By documenting the historical significance and character-defining features of historical resources meeting CRHR Criterion 3 to Historic American Buildings Survey (HABS), Historic American Landscape Survey (HALS), and Historic American Engineering Record (HAER) archival photograph and written-data standards, **MM-CUL-2** would reduce impacts on such resources present at any new sites acquired by the District for new school development, and at existing school properties. Preparation of interpretive and/or educational media through implementation of **MM-CUL-3** in cases of historical resources meeting CRHR Criteria 1 and/or 2 would also reduce impacts on such resources. Implemented in combination, **MM-CUL-2** and **MM-CUL-3** would reduce impacts on historical resources with significance under CRHR Criteria 1 or 2 and CRHR Criterion 3. In addition, **MM-CUL-4** could be implemented for buildings meeting any of the CRHR criteria to reduce impacts by retaining character-defining features and thereby maintaining the historic integrity of the structure.

However, **MM-CUL-1**, **MM-CUL-2**, **MM-CUL-3** and/or **MM-CUL-4** would not reduce impacts to a less-than-significant level in all potential scenarios. As such, the potential exists for future development to result in cumulatively considerable impacts on historical resources, when added to significant cumulative impacts from other past, present, and reasonably foreseeable site-specific projects (**Impact-C-CUL-1**).

As discussed in Section 4.4, ground-disturbing activities associated with the Proposed Program could result in the discovery of previously unidentified archaeological resources and the destruction of known archaeological resources. With the implementation of **MM-CUL-5** and **MM-CUL-6**, these impacts would be reduced to a less-than-significant level because the archaeological sensitivity analysis would identify the potential for encountering archaeological resources during ground-disturbing activities, and the recommendations would minimize potential damage or loss of subsurface archaeological resources. In addition, ground-disturbing activities associated with the Proposed Program have the potential to disturb human remains, including those interred outside of formal cemeteries. However, if human remains are discovered, work must halt in that area and the procedures as set forth in Public Resources Code (PRC) Section 5097.98 and State Health and Safety Code Section 7050.5 must be undertaken. Therefore, impacts on archaeological resources and human remains would not be cumulatively considerable.

### 5.2.4.4 Level of Significance Prior to Mitigation

**Impact-C-CUL-1**: **Potential to Result in a Cumulatively Considerable Contribution to a Cumulative Impact on Historic Resources.** Construction activities associated with the Proposed Program could result in the demolition or alteration of historic resources within the Program area, which would result in a cumulative considerable contribution to a cumulative impact on historic resources. This is a potentially significant impact.

### 5.2.4.5 Mitigation Measures

Implement **MM-CUL-1, MM-CUL-2, MM-CUL-3,** and/or **MM-CUL-4**, as described in Section 4.4, *Cultural Resources*.

### 5.2.4.6 Level of Significance After Mitigation

Implementation of **MM-CUL-1** through **MM-CUL-4** would not ensure that all impacts on historical resources would be reduced under all potential scenarios; therefore, **Impact-C-CUL-1** would remain significant and unavoidable.

The Proposed Program's incremental contribution to cumulative archaeological resources and human remains impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

## 5.2.5 Energy

A significant cumulative impact on energy would result if the Proposed Program, in combination with buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1, would contribute to cumulative impacts related to a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation, or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

### 5.2.5.1 Geographic Scope

The geographic scope for cumulative impacts for energy usage includes the San Diego Gas and Electric Company (SDG&E) service area, which is the entire County, and surrounding vicinity.

### 5.2.5.2 Cumulative Effects

A cumulative energy consumption impact would occur if development associated with plans identified in Table 5-1 or within the geographic scope of the cumulative impact analysis for energy use combined with the Proposed Program would increase energy consumption throughout the region. The cumulative plans listed in Table 5-1 would result in the associated redevelopment of urbanized sites that are currently served by SDG&E, and the development of the cumulative plans would not result in an expansion of SDG&E's service area. However, the cumulative plans would result in increases in energy demand compared to existing conditions, especially for those plans that would result in development on an undeveloped site that would represent a new energy demand. As required by the California Public Utilities Commission (CPUC), state utilities, including SDG&E, are required to file long-term energy resources plans with the CPUC. SDG&E's most recent long-term procurement plan was filed in October 2014, and includes plans and strategies to meet the future

energy demands of its customers, including a plan addressing the closure of the San Onofre Nuclear Generating Station. SDG&E would continue to import electricity and natural gas to meet regional demand; however, an increase in imported energy to meet demand could result in high energy prices and unreliable supply. SANDAG adopted a Regional Energy Strategy (RES) in 2009 to specifically address regional energy supply.

The RES includes proposed Early Actions to promote long-term energy efficiency and availability in the region. If the cumulative plans would not support the implementation of applicable Early Actions from the RES, a cumulative impact could occur. The cumulative plans would be required to comply with the Title 24 energy efficiency standards, which promote energy efficiency and reduce inefficient, wasteful, and unnecessary consumption of energy, as well as any other City–specific requirements. However, Title 24 does not require additional measures to support the other RES Early Actions, including supporting alternative transportation to reduce transportation energy use, reducing greenhouse gas (GHG) emission from energy use, and limiting water use to reduce indirect energy use for water transport. As such, it is possible that present and reasonably foreseeable future plans would not comply with all programs and policies designed to reduce energy demand. Therefore, impacts from development associated with past, present, and reasonably foreseeable future plans would be cumulatively significant.

### 5.2.5.3 Program Contribution

The Proposed Program has the potential to result in wasteful, inefficient, or unnecessary consumption of energy resources during construction activities. However, mitigation that would promote energy efficiency and sustainability measures to reduce energy consumption (**MM-GHG-1**) would reduce the Program's energy demand and fossil fuel use to ensure the Program does not result in potential wasteful, inefficient, or unnecessary consumption of energy resources. The Proposed Program also has the potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, as the Proposed Program would not be consistent with the District's sustainability actions identified in its *Dream Big* initiative. Implementation of **MM-GHG-2** would ensure consistency with the goals set forth in the Dream Big initiative with energy-reducing design features. Therefore, the Proposed Program would not conflict with state and local renewable energy and energy efficiency plans, and impacts would be less than significant. When combined with the cumulative plans listed in Table 5-1, which would be required to be designed in compliance with the building energy efficiency standards of the Title 24 building codes and to comply with any applicable state plans for renewable energy or energy efficiency to the extent required by law, cumulative impacts would be less than significant, and the Proposed Program's contribution to cumulative energy impacts would not be cumulatively considerable.

### 5.2.5.4 Level of Significance Prior to Mitigation

The Proposed Program's contribution to a cumulative energy impacts would be less than cumulatively considerable.

### 5.2.5.5 Mitigation Measures

No mitigation is required.

### 5.2.5.6 Level of Significance After Mitigation

The Proposed Program's incremental contribution to cumulative energy impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

## 5.2.6 Geology and Soils

A cumulatively considerable impact on geology and soils would occur if the Proposed Program, in combination with buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1, would contribute to a cumulatively considerable adverse effect, including the risk of loss, injury, or death involving the rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction or landslides; result in substantial soil erosion or the loss of topsoil; 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; and be located on expansive soil, creating substantial direct or indirect risks to life or property.

### 5.2.6.1 Geographic Scope

The geographic scope for cumulative geology and soils impacts is limited to the immediate area of the geologic constraint, with the exception of some geologic impacts that are regional, such as earthquake risk.

### 5.2.6.2 Cumulative Effects

Development associated with past, present, and reasonably foreseeable future plans identified in Table 5-1 would be required to test and remove onsite soils unsuitable for development and replace them with soils that are suitable consistent with engineering regulations (i.e., City grading requirements) and best practices (i.e., recommendations from geotechnical investigations).

Past and present development has increased, and will continue to increase, the infrastructure, structural improvements, and number of people working and living in San Diego's communities, which has placed, and will continue to place, commercial, industrial, and residential structures, their occupants, and associated infrastructure in areas that are susceptible to seismic phenomena. Present and reasonably foreseeable future plans listed in Table 5-1 would also potentially result in increased infrastructure, structures, and number of people working on site in the cumulative geographic scope. However, none of these plans would be capable of exacerbating the potential for a geologic hazard given their limited impact on the area's geologic setting and the requirement to grade and compact soils in accordance with local and state standards designed to prevent soil hazards from occurring. Moreover, specific regulations that address worker safety would be in place if a seismic event were to occur, helping to avoid any harm to people or extensive damage to structures. Consequently, the impacts of past, present, and reasonably foreseeable future plans as they relate to exacerbating fault rupture, seismic ground shaking, and liquefaction would be less than cumulatively significant.

### 5.2.6.3 Program Contribution

As discussed in Section 4.6, *Geology and Soils*, the Program area exists within an area of high seismic activity, and there is a potential that disturbance of soil during construction activities associated

with the Proposed Program could cause substantial soil erosion or the loss of topsoil or be located on unstable soils or geologic units, or expansive soils. However, all projects occurring under the Proposed Program would be required to comply with the District's *Architect's Professional Services Manual,* which requires geotechnical evaluations; the California Building Code (CBC); Division of the State Architect (DSA) requirements; and California Department of Education (CDE) standards, which would reduce any impacts related to seismic hazards, unstable soils, or expansive soils to less-than-significant levels. In addition, potential soil erosion impacts would be reduced to less than significant through implementation of **MM-HWQ-1**, as described in Section 4.6. Therefore, the Proposed Program, in combination with other cumulative plans, would not be cumulatively considerable, and cumulative impacts are less than significant.

#### 5.2.6.4 Level of Significance Prior to Mitigation

The Proposed Program's incremental contribution to cumulative geology and soils impacts would be less than cumulatively considerable.

#### 5.2.6.5 Mitigation Measures

No mitigation is required.

#### 5.2.6.6 Level of Significance After Mitigation

The Proposed Program's incremental contribution to cumulative geology and soils impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

### 5.2.7 Greenhouse Gas Emissions

There would be the potential for a cumulatively considerable GHG-related impact if the Proposed Program, in combination with buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1, would be inconsistent with the City's Climate Action Plan (CAP) reduction targets; non-compliant with regulatory programs outlined in the Scoping Plan and adopted by CARB or other California agencies to reduce GHG emissions in 2020; inconsistent with the post-2020 reduction targets set forth through California Executive Order (EO) S-03-05 and Senate Bill (SB) 32; or non-compliant with plans, policies, and regulations promulgated to reduce GHG emissions post-2020. There would be the potential for a cumulatively considerable climate change impact if the project would expose property and persons to the physical effects of climate change including, but not limited to, flooding, public health risk, wildfire risk, or other impacts resulting from climate change. Finally, there would be the potential for a cumulatively considerable energy use–related impact if the project would contribute to a cumulatively significant impact related to the wasteful, inefficient, and unnecessary usage of direct or indirect energy.

#### 5.2.7.1 Geographic Scope

Climate change is a cumulative issue, and the geographic scope for cumulative GHG emission impacts is global. Because climate change is the result of cumulative global emissions, no single project, when taken in isolation, can cause climate change—a single project's emissions are insufficient to change the radiative balance of the atmosphere. Because climate change is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, cumulative GHG emissions that contribute to global climate change will have a significant cumulative impact on the

natural environment as well as on human development and activity. The global increase in GHG emissions that has occurred and will occur in the future is the result of the actions and choices of individuals, businesses, local governments, states, and nations. Furthermore, although climate change impacts will likely vary by geography and intensity, the impacts that will result from cumulative global emissions will be felt worldwide. The GHG and climate change analysis within Section 4.7, *Greenhouse Gas Emissions*, is inherently a cumulative analysis. However, a summary of the discussion is provided below.

### 5.2.7.2 Cumulative Effects

Past, present, and reasonably foreseeable future plans throughout the region, state, nation, and world, including, but not limited to, those plans listed in Table 5-1, have contributed to, and will continue to contribute to, the cumulative impacts of global climate change. As with the Proposed Program, all the development associated with plans in Table 5-1, along with all other projects within the county, state, and region, would be required to comply with all applicable federal, state, and local policies and regulations regarding GHG emission reductions (e.g., SB 32, Pavley 1, Advanced Clean Cars, Renewables Portfolio Standard, SB 350) and adapting to climate change (e.g., sea level rise). However, changes from past, present, and reasonably foreseeable future projects have contributed to, and will continue to contribute to, a cumulatively significant impact in the Program area.

### 5.2.7.3 Program Contribution

As discussed in Section 4.7, the Proposed Program would contribute GHG emissions to the cumulative condition during construction and operations. With implementation of **MM-AQ-2** and **MM-GHG-1**, construction impacts would be reduced to less-than-significant levels, and construction-related emissions generated by the Proposed Program would not make a cumulatively considerable contribution to GHG emissions.

However, as shown in Tables 4.7-7 and 4.7-8 in Section 4.7, operation of the Proposed Program would result in emissions that exceed the numerical efficiency target for 2030. Similarly, the Proposed Program would not be consistent with CARB's 2017 Climate Change Scoping Plan because it would not implement all of the applicable reduction measures. Implementation of **MM-GHG-2** would reduce operational GHG emissions by reducing emissions in various sectors but may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. Therefore, even after mitigation, the Proposed Program could result in a cumulatively considerable impact related to GHG emissions because it may impede achievement of near-term state reduction targets (**Impact-C-GHG-1**).

In addition, as discussed under Threshold 2 of Section 4.7, while the District would aim to implement all applicable actions and design criteria per its *Dream Big* initiative, there is no guarantee that all actions and design criteria will be incorporated into the project design of all future projects. Therefore, it is conservatively assumed that the Proposed Program's emission levels would be inconsistent with the goals in EO B-55-18/S-3-05. Accordingly, the project's contribution to cumulative climate change impacts would be cumulatively considerable (**Impact-C-GHG-2**).

### 5.2.7.4 Level of Significance Prior to Mitigation

**Impact-C-GHG-1: Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Operation.** The

Proposed Program could result in long-term greenhouse gas emissions, exceeding District-specific thresholds, where applicable. Future projects would be encouraged to implement District-wide sustainability actions per its *Dream Big* initiative and Collaborative for High Performance Schools criteria related to area, energy, water, and wastewater. However, while the District would aim to implement all applicable actions and design criteria, there is no guarantee that all actions and design criteria will be incorporated into the project design of all future projects. Therefore, the Proposed Program is conservatively assumed to conflict with the state's 2030 emissions reduction target or the 2017 Scoping Plan. This is a potentially significant impact.

**Impact-C-GHG-2: Potential to Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases.** The Proposed Program could result in construction and long-term operational GHG emissions. Future projects would aim to implement District-wide sustainability actions per its *Dream Big* initiative and design guide, and Collaborative for High Performance Schools criteria related to area, energy, water, and wastewater. However, while the District would aim to implement all applicable actions and design criteria, there is no guarantee that all actions and design criteria will be incorporated into the project design of all future projects. Therefore, it is conservatively assumed that the Proposed Program's emission levels would be inconsistent with the goals in EO B-55-18/S-3-05. This is a potentially significant impact.

### 5.2.7.5 Mitigation Measures

For **Impact-C-GHG-1**:

Implement **MM-GHG-2**, as described in Section 4.7, *Greenhouse Gas Emissions*.

For **Impact-C-GHG-2**:

Implement **MM-GHG-1** and **MM-GHG-2,** as described in Section 4.7.

### 5.2.7.6 Level of Significance After Mitigation

Implementation of **MM-GHG-2** would reduce operational GHG emissions, but depending on the design features implemented, may not fully assist the District in meeting the state's 2030 emissions reduction target and ensure consistency with the 2017 Scoping Plan. **Impact-C-GHG-1** would remain significant and unavoidable.

In addition, implementation of **MM-GHG-1** and **MM-GHG-2** would be consistent with anticipated long-term statewide strategies to reduce GHG emissions during construction and operation. However, these measures may not be adequate on their own to reduce program-level emissions during operation to levels that would comply with the 2017 Scoping Plan and meet the state's long-time climate change goals in EO S-3-05/B-55-18. Therefore, **Impact-C-GHG-2** would remain significant and unavoidable.

## 5.2.8 Hazards and Hazardous Materials

A significant cumulative impact on hazards and hazardous materials would result if the Proposed Program, in combination with buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1, were to contribute to impacts related to 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; result in impacts related to the project being located on

a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment; or be located within an airport land use plan or be within 2 miles of a public airport or public use airport, and result in a safety hazard or excessive noise for people residing or working within the vicinity of the Program area.

Because the Proposed Program would have no impacts related to the following issues, it would also have no cumulative impacts related to these issues: routine transport, use, or disposal of hazardous materials; emit hazardous emissions or use hazardous materials within one-quarter mile of an existing or proposed school; or impair the implementation of an emergency response plan.

### 5.2.8.1 Geographic Scope

The hazards and hazardous materials geographic scope of analysis consists of the areas that could be affected by activities associated with the Proposed Program, as well as areas affected by other projects whose activities could directly or indirectly affect the Proposed Program. For example, this cumulative analysis would evaluate a groundwater plume that is located below District facilities and the site of a past, present, or reasonably foreseeable future project. In general, projects occurring within 0.25 mile of District facilities were considered in this analysis due to the localized nature of potential impacts associated with the release of hazardous materials into the environment

### 5.2.8.2 Cumulative Effects

As discussed in Section 4.8, *Hazards and Hazardous Materials*, record searches using Environmental Data Resources were conducted, and Ninyo & Moore Geotechnical & Environmental Sciences Consultants prepared an *Environmental Conditions/Hazards Programmatic Environmental Impact Report* for the District. The results indicate that there are 198 sites listed on one or more environmental databases. Based on a review of the available information for each site, Ninyo & Moore evaluated the sites with database listings for potential impacts on soil, groundwater, or soil vapor at the site. Ninyo & Moore determined 52 of the 198 sites were of potential environmental concern.

There were several sites in which releases were recorded within the Program area. Simply the presence of sites (with a history of releases) within the cumulative study area is not sufficient to determine if a significant cumulative impact is present. Evidence must suggest that the contamination has resulted in a cumulative condition to which other projects are contributing. This was not evident during the database research because existing contamination was caused by individual sites and not exacerbated by multiple sites. Therefore, impacts from past cumulative projects are not cumulatively significant.

Development associated with present and reasonably foreseeable future plans within the cumulative study area could disrupt or result in the exposure of hazardous materials that are typically used during construction activities; however, the risk for exposure to hazardous materials would be analyzed during project development. For projects having the potential to disrupt or result in the exposure of hazardous materials, mitigation measures would be required during construction to reduce potential impacts to a level below significance. These projects, like the Proposed Program, are required to comply with all federal, state, and local policies regarding hazards and hazardous materials, such as the ones described in Section 4.8.3, *Applicable Laws and Regulations*, which would reduce potential releases of hazardous materials into the environment. Because all cumulative

projects listed in Table 5-1 with potential to expose hazardous materials during construction in the Program area would be subject to federal, state, and local hazardous materials laws, including those described in Section 4.8.3, cumulative effects related to hazardous materials from past, present, and reasonably foreseeable future projects would be less than cumulatively significant.

### 5.2.8.3 Program Contribution

As discussed in Section 4.8, while the Proposed Program could result in potential hazard and hazardous materials impacts on related to construction and operational activities, all potential impacts would all be reduced to less-than-significant levels through the implementation of **MM-HAZ-1** through **MM-HAZ-12**. Therefore, the contribution to cumulative hazard and hazardous materials impacts associated with the Proposed Program would not be cumulatively considerable.

### 5.2.8.4 Level of Significance Prior to Mitigation

The Proposed Program's incremental contribution to cumulative hazard and hazardous materials impacts would not be cumulatively considerable.

### 5.2.8.5 Mitigation Measures

No mitigation is required.

### 5.2.8.6 Level of Significance After Mitigation

The Proposed Program's incremental contribution to cumulative hazard and hazardous materials impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

## 5.2.9 Hydrology and Water Quality

A significant cumulative impact on hydrology and water quality would result if the Proposed Program, in combination with buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1, were to contribute to impacts related to water quality standard violations, decrease groundwater supplies or interfere with recharge, or alter drainage patterns leading to erosion or flooding; 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; impede or redirect flood flows; in flood hazards, tsunami, or seiche zones, risk release of pollutants due to inundation; or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

### 5.2.9.1 Geographic Scope

The geographic scope of analysis for cumulative impacts on hydrology and water quality includes the receiving waters within the following watersheds—Los Peñasquitos, Mission Bay and La Jolla, San Diego Bay, and San Diego River—which includes the jurisdictions of a number of the plans listed in Table 5-1.

### 5.2.9.2 Cumulative Effects

Past projects within the Los Peñasquitos, Mission Bay and La Jolla, San Diego Bay, and San Diego River watersheds have contributed pollutants to a number of receiving waterways, as evidenced by

the Clean Water Act (CWA) Section 303(d) List of Water Quality Limited Segments Requiring Total Maximum Daily Loads. Current and future plans would be subject to state and local regulatory standards that must be achieved during construction and operation of development projects occurring as a result of plans to reduce or avoid polluted runoff to the maximum extent practicable. Development associated with current and reasonably foreseeable future plans could also contribute pollutants such as oil and grease, suspended solids, metals, gasoline, pesticides, and pathogens into the stormwater conveyance systems and receiving waters.

Development associated with many of the cumulative plans listed in Table 5-1 would involve at least 1 acre of grading. During construction of development associated with these plans, projects would be required to comply with the National Pollution Discharge Elimination System (NPDES) Construction General Permit, which requires preparation of a SWPPP by a Qualified SWPPP Developer and implementation of BMPs by a Qualified SWPPP Practitioner to ensure runoff from individual projects meet current water quality standards. For projects under 1 acre, the Municipal Permit requires minimum BMPs at all construction and grading projects. The minimum BMPs are required to ensure a reduction of potential pollutants from the project site to the maximum extent practicable and to effectively prohibit non-stormwater discharges from construction sites to the Municipal Separate Storm Sewer System.

Present and reasonably foreseeable future plans would be subject to regulations that require compliance with water quality standards, including state and local water quality regulations and the City of San Diego's Storm Water Management and Discharge Control Ordinance, which identifies water quality BMP requirements (for projects within the City's jurisdiction). For development projects in the City, the Storm Water Management and Discharge Control Ordinance requires implementation of measures to reduce the risk of non-stormwater discharges and pollutant discharges through the use of BMPs. However, because the San Diego Bay is currently an impaired water body and has been for some time, the cumulative effect of past, present, and reasonably foreseeable future projects may result in a cumulatively significant water quality impact.

### 5.2.9.3 Program Contribution

As discussed in Section 4.9, *Hydrology and Water Quality*, the Proposed Program would potentially include the construction activities that would involve substantial ground disturbance over a period of several years and require the use of heavy equipment. Construction activities associated with the Proposed Program could result in activities such as demolition, grading and excavation, filling and compaction, and construction of aboveground facilities and buildings, which could degrade water quality by increasing polluted stormwater runoff. As such, construction activities associated with the Proposed Program could violate water quality standards or waste discharge requirements, and impacts would be potentially significant. However, these potential significant direct project impacts would be reduced to less-than-significant levels with the implementation of **MM-HWQ-1** and **MM-HWQ-2**, as described in Section 4.9.

Development projects associated with implementation of cumulative plans that would involve at least 1 acre of grading during construction would be required to comply with the NPDES Construction General Permit, which requires preparation of a SWPPP by a Qualified SWPPP Developer and implementation of BMPs by a Qualified SWPPP Practitioner to ensure runoff from individual projects meet current water quality standards. For projects under 1 acre, the Municipal Permit requires minimum BMPs at all construction and grading projects. The implementation of BMPs for all construction sites is required to ensure a reduction of potential pollutants from the

project sites to the maximum extent practicable and to effectively prohibit non-stormwater discharges from construction sites to the Municipal Separate Storm Sewer System or directly to receiving waters.

Present and reasonably foreseeable future plans would be subject to CWA regulations that require compliance with water quality standards, including state and local water quality regulations and the City of San Diego's Storm Water Management and Discharge Control Ordinance, which identifies water quality BMP requirements (for projects within the City's jurisdiction). For development projects in the City, the Storm Water Management and Discharge Control Ordinance requires implementation of measures to reduce the risk of non-stormwater discharges and pollutant discharges through the use of BMPs. In addition, development projects would also need to potentially comply with CWA Section 404 and 401 regulations, requiring implementation of additional BMPs to protect water quality during construction. Therefore, the Proposed Program's incremental contribution to significant cumulative water quality impacts from past, present, and reasonably foreseeable future projects would be less than cumulatively considerable. Consequently, the Proposed Program would not be in conflict with or obstruct implementation of the applicable water quality control plan in the program area. Impacts would be less than significant. Furthermore, implementation of **MM-HWQ-1** would ensure compliance with the Construction General Permit or City of San Diego's Jurisdictional Runoff Management Plan (JRMP) for construction activities, as applicable, and **MM-HWQ-2** would ensure compliance with the most current MS4 Permit and JRMP requirements; thus, the Proposed Program would not conflict with or obstruct implementation of the applicable water quality control plan. The Proposed Program would not utilize groundwater resources and would not conflict with or obstruct implementation of a sustainable groundwater management plan. Therefore, the Proposed Program's impacts related to implementation of an applicable water quality control plan or sustainable groundwater management plan would not be cumulatively considerable.

Ground-disturbing activities associated with construction activities under the Proposed Program could expose soils to the erosional forces of wind and water during storm events, potentially resulting in erosion and sedimentation on- and off site and result in the discharge of siltation into storm drains and receiving waters, which would be potentially significant. During operation, the impervious surface area could be changed compared to the existing condition and could result in an increase of impervious surface area. Consequently, the amount of stormwater runoff would also increase, and result in increased erosion or siltation. As discussed in Section 4.9, with implementation of **MM-HWQ-3** and **MM-HWQ-4,** these potential significant direct project impacts would be reduced to less-than-significant levels. The Proposed Program's impacts related to erosion and siltation would not be cumulatively considerable.

Surface runoff associated with the Proposed Program would be handled in the storm drain systems as there are not large rivers or streams flows that create flood conditions. However, there are some school sites that are located adjacent to a flood zone that could experience flood conditions during large storm events. During construction activities, drainage systems would be temporarily modified, which could result in localized flooding, which would be a potentially significant impact. During operation, the impervious surface area could be changed compared to the existing condition and could result in an increase of impervious surface area. Consequently, the amount of stormwater runoff would also increase, which could increase the amount of runoff from the school sites. This increase could result in substantial flooding on or off site, which would be a potentially significant impact. However, these potential significant direct project impacts would be reduced to less-than-significant levels with the implementation of **MM-HWQ-1** and **MM-HWQ-2**. Development associated

with cumulative plans would be required to comply with the Construction General Permit, which would require development and implementation of a SWPPP. For development projects associated with the cumulative plans identified in Table 5-1 under 1 acre of land, construction activities would implement construction BMPs, consistent with the City of San Diego's JRMP.

Drainage systems could be temporarily modified during construction activities associated with the Proposed Program and could alter the drainage pattern resulting in exceeding the capacities of existing storm drains, which would be potentially significant. Anticipated pollutants of concern expected from operation of the projects under the Proposed Program would include trash and debris, oil and grease, oxygen-demanding substances, bacteria and viruses, and heavy metals. Other potential pollutants of concern include pesticides and nutrients from landscape. All of these pollutants could discharge from future project sites, which would be potentially significant. However, these potentially significant direct project impacts would be reduced to less-than-significant levels with the implementation of **MM-HWQ-1** and **MM-HWQ-2**. Therefore, the Proposed Program's impact related to runoff water that would exceed the capacity of existing or planned stormwater drainage systems or substantial additional sources of polluted runoff would not be cumulatively considerable.

The Proposed Program is not anticipated to result in impacts related to depletion of groundwater supplies or interference with recharge; and/or the release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. As such, the Proposed Program's incremental contribution to flooding would not be cumulatively considerable.

### 5.2.9.4 Level of Significance Prior to Mitigation

The Proposed Program's incremental contribution to cumulative hydrology and water quality impacts would not be cumulatively considerable.

### 5.2.9.5 Mitigation Measures

No mitigation is required.

### 5.2.9.6 Level of Significance After Mitigation

The Proposed Program's incremental contribution to cumulative hydrology and water quality impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

## 5.2.10 Noise and Vibration

A significant cumulative impact on noise and vibration would result if the Proposed Program, in combination with buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1, were to contribute to impacts related to exceedances of noise standards, groundborne vibration, or ambient noise levels when evaluated within the context of past, present, and reasonably foreseeable future plans. At the Program level, there were determined to be no impacts related to air traffic noise; as such, cumulative impacts related to air traffic noise are not evaluated.

### 5.2.10.1 Geographic Scope

The geographic scope of analysis for cumulative noise impacts related to onsite activities (construction and operations) is the area within 1,500 feet of the Program area. The geographic

scope of analysis for cumulative noise impacts related to traffic was assessed similar to that for the direct noise impacts, which was based on the nature of the buildout of the cumulative plans listed in Table 5-1 and the known effect of typical variables (traffic speed, number of trips per day, etc.) on overall traffic noise levels.

## 5.2.10.2 Cumulative Effects

Table 5-1 includes past, present, and future projects within and in the vicinity of the Program area. Each of these projects would potentially add noise sources that would increase local noise levels. Because the region is already developed with numerous noise sources such as freeways, roads, railroads, airports, and onsite operations, the additional noise from any one project would typically be incremental relative to existing conditions. Because noise and vibration attenuate quite rapidly with distance from the source, the effects from an individual project are quite localized to the project site or the facility affected (roadway, railroad, etc.). In general, all cumulative projects will be subject to some combination of federal, state, and local guidelines that will help to control individual noise levels. Nonetheless, past and present development has increased, and will increase, the number of people working and/or living in the Program area and adjacent cities, which will tend to increase overall noise levels over time. At some sensitive land uses in the Program area, the overall noise or vibration levels currently do, or will in the future, exceed standards or guidelines established by the City of San Diego Municipal Code Construction Noise Limits, other applicable local noise ordinances, general plan noise elements, or other applicable standards. As a result, cumulative effects related to noise and vibration would be cumulatively significant at some locations in the vicinity of the Program area.

## 5.2.10.3 Program Contribution

### Construction

Construction of the Proposed Program would result in high noise levels at nearby noise-sensitive receptors, especially as a result of the construction of new school or administrative facilities under the Proposed Program. If construction for nearby related projects were to occur simultaneously with construction associated with the Proposed Program, cumulative construction noise levels would likely be exacerbated and the Proposed Program's contribution would be cumulatively considerable (**Impact-C-NOI-1**). Implementation of **MM-NOI-1** through **MM-NOI-6** would be required, which would require site-specific noise reviews and apply restrictions to construction activities and implementation of best management practices. However, it may not be possible to fully implement all of these measures and reduce all construction noise levels to comply with the noise limits specified in the City's Municipal Code (i.e., 75 dBA 12-hour $L_{eq}$). Limitations may include the inability to avoid working in proximity to neighboring noise-sensitive land uses or the inability to construct efficient temporary noise barriers due to local terrain conditions, or engineering, constructability, or safety considerations.

Similarly, because the exact distances from future construction work to any nearby sensitive receptors are currently not known it is possible that construction related to the Proposed Program would exceed the 0.4 inch/second threshold for human annoyance. In addition, if cumulative projects employ any of the construction equipment types included in Table 4.10-16, there is a potential to generate groundborne vibration impacts on sensitive buildings if the activity occurs within the specified distances. If construction for nearby related projects identified in Table 5-1 were to occur simultaneously with construction associated with the Proposed Program or other

development associated with the plans listed in Table 5-1, cumulative construction vibration levels would likely be exacerbated and the Proposed Program's contribution would be cumulatively considerable (**Impact-C-NOI-2**and **Impact-C-NOI-3**). Implementation of **MM-NOI-16** and **MM-NOI-17** would be required, which would ensure that construction activities would avoid building damage due to vibration by requiring that appropriate distances are maintained between buildings and vibration-generating construction equipment and/or implementation of recommendations from a qualified engineer and construction monitoring to protect nearby buildings, and avoid or reduce annoying vibration at occupied sensitive offsite buildings during construction. However, vibration could cause vibration at sensitive buildings or exceed the established threshold for potential annoyance, and impacts associated with construction activities under the Proposed Program would remain significant and unavoidable.

### Operation

Whether operation of the Proposed Program would result in significant noise impacts depends on the operational project details, the proximity of noise-sensitive receptors, the receiving land use (because this will determine the applicable noise limit per the City's Municipal Code), and the existing ambient noise levels in the project vicinity. Details of anticipated noise sources, such as mechanical equipment and possible athletic stadiums, remain unknown. Consequently, it is not possible to make reliable predictions about the overall noise levels from onsite operations that would result from the Proposed Program and it is possible that they could cause a noticeable increase (3 decibels or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code, particularly for the New Acquisition and New School or Administrative Facilities project category because it would add new noise sources to a project site. Accordingly, when combined with the cumulatively significant effects from past, present, and reasonably foreseeable future plans, the Proposed Program's incremental contribution from operational noise impacts would be cumulatively considerable (**Impact-C-NOI-4** and **Impact C-NOI-5**). Implementation of **MM-NOI-13** and **MM-NOI-14** would reduce traffic noise impacts. However, with limited routes to and from existing District sites, it may not be possible to fully implement these measures and avoid traffic noise impacts at all nearby sensitive receptors. As a result, traffic noise impacts during operations of the Proposed Program would remain significant and unavoidable. In addition, implementation of **MM-NOI-10**, **MM-NOI-11**, **MM-NOI-12** would reduce other operational impacts (from mechanical equipment, athletic facilities, playgrounds, etc.) at offsite uses. It is anticipated that **MM-NOI-11** will be fully implemented and will reduce noise from mechanical equipment to less-than-significant levels. However, it may not be possible to fully implement **MM-NOI-12** for major athletic facilities and other onsite noise sources such as parking lots and playgrounds. Limitations may include the inability to locate these sources at sufficient distances from neighboring noise-sensitive land uses or the inability to construct effective noise barriers due to factors such as aesthetics, safety/security, or cost. In the case of major athletic facilities, the source noise level may simply be too high during large events to fully mitigate at nearby receptors. As a result, offsite noise impacts due to onsite operations associated with the Proposed Program would remain significant and unavoidable.

## 5.2.10.4 Level of Significance Prior to Mitigation

**Impact-C-NOI-1: Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of the Proposed Program.** Noise levels due to various construction activities (phases) associated with the Proposed

Program in combination with construction activities at other nearby development could exceed 75 A-weighted decibel, 12-hour equivalent sound level at residences or other offsite noise-sensitive receptors. These impacts could occur if one or more project construction phase(s) occur within the screening distances identified in Table 4.10-11 or Table 4.10-13. (Actual impact distances could be shorter depending on site-specific details such as ground conditions and the presence of any acoustical screening.)

**Impact-C-NOI-2: Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Offsite Sensitive Receptors during Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential human annoyance. The actual impacts, if any, would depend on the equipment used and the distance to the affected sensitive buildings. Specifically, a significant impact would occur if project construction occurs within the "distinctly perceptible" threshold distance of an occupied sensitive building, as identified in Table 4.10-17 based on the actual construction equipment to be used.

**Impact-C-NOI-3: Exceed Caltrans Guideline Criteria for Potential Building Damage During Project Construction.** Vibration levels due to various construction activities could exceed recommended criteria for potential building damage. The actual impacts, if any, would depend on the equipment used and the distance to the affected structure(s). Specifically, a significant impact would occur if project construction occurs within one or more of the threshold distances identified in Table 4.10-16 based on the actual construction equipment to be used. This is a potentially significant impact.

**Impact-C-NOI-4: Increase Traffic Noise by 3 Decibels Averaged Over 24 Hours or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips.** Vehicle trips generated by the Proposed Program in combination with other new developments have the potential to cause a traffic noise increase of 3 decibels (dB) Community Noise Equivalent Level (CNEL) or more that would result in a noise level greater than 65 dB CNEL at an offsite residence, hospital, nursing facility, intermediate care facility, school, daycare, library, hotel, motel, or park, or 70 dB CNEL at an offsite church or museum.

**Impact-C-NOI-5: Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code.** Operation of the Proposed Program in combination with any new noise-generating development have the potential to cause a noticeable increase (3 decibels or more) in noise levels that would result in a noise level greater than the limits specified in the City's Municipal Code.

### 5.2.10.5 Mitigation Measures

For **Impact-C-NOI-1**:

Implement **MM-NOI-1** through **MM-NOI-6,** as described in Section 4.10, *Noise and Vibration*.

For **Impact-C-NOI-2**and **Impact C-NOI-3**:

Implement **MM-NOI-16** and **MM-NOI-17,** as described in Section 4.10.

For **Impact-C-NOI-4** and **Impact C-NOI-5**:

Implement **MM-NOI-10** through **MM-NOI-14,** as described in Section 4.10.

### 5.2.10.6 Level of Significance After Mitigation

Implementation of **MM-NOI-1** through **MM-NOI-18** would reduce the project's contribution to cumulative construction noise impacts, but not to a level less than significant if construction activities for related projects within 1,500 feet of project sites within the Proposed Program area were to overlap with Proposed Program construction or operation. Cumulative impacts would be significant and unavoidable.

## 5.2.11 Paleontological Resources

A significant cumulative impact on paleontological resources would result if the Proposed Program, in combination with buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1, would contribute to cumulative impacts through the direct or indirect destruction of unique paleontological resources or sites.

### 5.2.11.1 Geographic Scope

The geographic scope of analysis for cumulative paleontological resource impacts includes the overall Program area. Impacts on paleontological resources generally occur from ground-disturbing activities, such as excavation. Ground-disturbing activities associated with present and reasonably foreseeable future plans that could contribute to cumulative impacts on paleontological resources would take place in projects that would extend to depths of 10 feet or greater below existing surface grade and require more than 1,000 cubic yards or 2,000 cubic yards of excavation if the project site is underlain by a geologic units with high or moderate paleontological sensitivity.

### 5.2.11.2 Cumulative Effects

Past projects within the geographic scope have resulted in the urban development seen today. Like the Program area, plans identified in Table 5-1 in the surrounding area contain paleontological resources. Past development in the City of San Diego and adjacent communities have resulted in impacts on paleontological resources primarily due to ground-disturbing activities during construction. As redevelopment continues to occur within the Program area and surrounding communities, providing increased density and additional commercial opportunities for residents, excavation activities associated with new development could disturb paleontological resources. However, discretionary projects are required to undergo CEQA review. The CEQA lead agency having jurisdiction over a project is responsible for ensuring that paleontological resources are protected in compliance with CEQA and other applicable statutes. CEQA Section 21081.6 requires that the lead agency demonstrate project compliance with mitigation measures developed during the environmental impact review process. While present and reasonably foreseeable future plans would likely continue to discover buried paleontological resources, future environmental review—with mitigation—would reduce the potential destruction of paleontological resources.

Without proper professional assessment and systematic collection of data, previous urban development has resulted in the loss of potentially significant scientific data. More recent development has been carried out under federal, state, and local regulations, with mitigation of significant impacts. However, because paleontological resources are non-renewable resources, the direct and indirect impacts of past, present, and future projects are cumulatively significant.

### 5.2.11.3 Program Contribution

As discussed in Section 4.11, *Paleontological Resources*, ground-disturbing activities associated with the Proposed Program could result in the direct or indirect destruction of paleontological resources. With the implementation of **MM-PAL-1** and **MM-PAL-2**, this impact would be reduced to a less-than-significant level because future projects would be required to screen for grading quantities and paleontological sensitivity, and the recommended monitoring of any ground-disturbing activities that extend 10 feet or more below ground surface would minimize the potential to affect a unique paleontological resource or site. Therefore, impacts on paleontological resources would not be cumulatively considerable.

### 5.2.11.4 Level of Significance Prior to Mitigation

The Proposed Program's contribution to a cumulative paleontological resources impact would be less than cumulatively considerable.

### 5.2.11.5 Mitigation Measures

No mitigation is required.

### 5.2.11.6 Level of Significance After Mitigation

The Proposed Program's incremental contribution to cumulative paleontological resource impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

## 5.2.12 Recreation

Cumulative impacts on recreation could result when the Proposed Program and buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1 combine to 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, or include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

The Proposed Program would not result in impacts related to the substantial deterioration of existing neighborhood and regional parks or other recreational facilities; as such, cumulative impacts related to physical deterioration of recreational facilities are not evaluated.

### 5.2.12.1 Geographic Scope

Cumulative impacts for recreation are based on a list of plans that are currently being updated, adopted, or proposed and likely to be implemented in the communities within the City of San Diego, and more generally within the Program area discussed in Section 4.12, *Recreation*. Therefore, the cumulative setting for recreation includes all of the plans listed in Table 5-1.

### 5.2.12.2 Cumulative Effects

Potential cumulative recreational impacts would result when plans would combine to require the construction or expansion of recreational facilities such that an adverse effect on the environment would occur. The identified cumulative plans in Table 5-1 may include the expansion or

construction of new recreational facilities. Such additions will have occurred and will continue to occur in compliance with requirements of existing plans and policies; however, reasonably foreseeable future projects within the City of San Diego are expected to provide parkland or to pay in lieu fees in accordance with the Quimby Act that will be used to improve existing recreational facilities or construct new recreational facilities. Therefore, impacts related to the expansion or construction of recreational facilities from past, present, and reasonably foreseeable future plans would not be cumulatively significant.

### 5.2.12.3 Program Contribution

As discussed in Section 4.12, the Proposed Program would not require new or expanded recreational facilities, the construction of which could result in adverse physical effects on the environment. Therefore, the Proposed Program's incremental contribution to cumulative recreational impacts would be less than cumulatively considerable.

### 5.2.12.4 Level of Significance Prior to Mitigation

The Proposed Program's incremental contribution to cumulative recreation impacts would not be cumulatively considerable.

### 5.2.12.5 Mitigation Measures

No mitigation is required.

### 5.2.12.6 Level of Significance After Mitigation

The Proposed Program's incremental contribution to cumulative recreation impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

## 5.2.13 Transportation

Based on the changes to the State CEQA Guidelines initiated by the passage of SB 743, a project's impact on transportation is measured by the amount of vehicle miles traveled (VMT) that would be generated. By its nature, VMT is inherently a cumulative issue, as it is not likely that any single project would be large enough to prevent the region or state from meeting its VMT reduction targets, which correlate to the state's GHG reduction targets. Rather, a project's individual VMT contributes to cumulative VMT impacts. Therefore, the methodology for determining a project's cumulative VMT impact is the same as that for direct VMT impacts (see Section 4.13, *Transportation*).

Cumulative impacts on transportation could also occur if the Proposed Program, when combined with buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1, would conflict with applicable programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Cumulative impacts could also occur if the Proposed Program, when combined with past, present, and probable future projects identified in Table 5-1, would conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). Additionally, cumulative impacts could occur if the Proposed Program, when combined with past, present, and reasonably future projects, would result in substantial increases in hazards due to geometric design features or incompatible uses, or result in inadequate emergency access.

### 5.2.13.1 Geographic Scope

The geographic scope for cumulative VMT impacts includes the entire San Diego region. As such, the VMT analysis within Section 4.13 is inherently a cumulative analysis. A summary of the analysis in Section 4.13 is provided below. The geographic scope for the cumulative analysis includes the areas where all past, present, and probable future community plans have affected, or would have the potential to affect transit, roadway, bicycle, pedestrian, and parking facilities.

### 5.2.13.2 Cumulative Effects

#### Consistency with Applicable Programs, Plans, Ordinances, or Policies Addressing the Circulation System

Past, present, and probable future projects within the geographic scope have contributed, and will continue to contribute, to degraded traffic operations from the generation of vehicle trips. The degradation of traffic operations could be inconsistent with applicable programs, plans, ordinances, or policies addressing roadway facilities. However, with the adoption of SB 743, a project's effect on automobile delay no longer constitutes a significant environmental impact under CEQA (State CEQA Guidelines Section 15064.3). Therefore, any inconsistency with applicable programs, plans, ordinances, or policies, as it relates to delay-based traffic operation metrics, is provided for informational purposes only and does not constitute a significant impact on the environment.

In addition to roadway facilities, cumulative effects on pedestrian, bicycle, and transit facilities could occur if past, present, and probable future projects would conflict with an applicable program, plan, ordinance, or policy addressing these facilities. Present and probable future projects would be required to demonstrate consistency with applicable programs, plans, ordinances, and policies related to pedestrian, bicycle, and transit facilities. Therefore, cumulative effects from past, present, and probable future projects would not be significant.

#### Vehicle Miles Traveled

The generation of VMT, which is a function of the number and distance of vehicle trips, is largely a cumulative impact by nature. VMT from past, present, and probable future projects have contributed to, and will continue to contribute to, cumulative VMT impacts as well as similarly cumulative secondary physical environmental effects such as increased GHG emissions. Based on the legislative intent of SB 743, which focuses on long-term VMT reductions through smart growth and planning, the temporary generation of VMT from construction traffic is not expected to substantially increase VMT in the region such that it could contribute to long-term adverse environmental effects from increases in greenhouse gas and criteria pollutant emissions or hinder the promotion of multimodal transportation systems or implementation of clean, efficient access to destinations; and project's with temporary effects on VMT and the transportation system are not deemed to be significant.

Cumulative present and probable future projects would be required to comply with SB 743 during project-specific environmental review. Mitigation may reduce VMT for a project, but still may not reduce potential impacts to a less-than-significant level. Therefore, present and probable future projects in the region could result in a cumulatively significant VMT impact.

### Hazards Due to Geometric Design Features and Incompatible Uses

There are several past, present, and probable future projects from Table 5-1 that involve modifications and improvements to transportation facilities within the geographic scope, some of which could include geometric design hazards or introduce incompatible uses.

Past projects have already been approved and constructed, and therefore would have been required to be designed to ensure that they would not substantially increase hazards due to geometric design features. Additionally, reasonably foreseeable future projects would require review by the City to ensure compliance with the City's roadway standards. Any temporary roadway and sidewalk closures would occur in accordance with existing City of San Diego requirements to ensure that safe alternative means of pedestrian, bicycle, and vehicle access are provided during the temporary closures. Therefore, cumulative effects from past, present, and probable future projects would not be significant.

### Emergency Access

None of the past, present, and probable future plans from Table 5-1 have included or would include components that could affect emergency access. Reasonably foreseeable future projects that would occur under implementation of these plans would generally involve repair, replacement, reconstruction, and/or new construction within the Program area, which could require temporary roadway closures. However, any temporary roadway closures would occur in accordance with existing City of San Diego requirements to ensure that adequate emergency access is provided during the temporary closures. Therefore, cumulative effects from past, present, and probable future projects would not be significant.

## 5.2.13.3 Program Contribution

As noted above, past, present, and probable future plans identified in Table 5-1 have not resulted in cumulative effects related to inconsistencies with applicable programs, plans, ordinances, and policies addressing the circulation system, including transit, roadway, pedestrian, and bicycle facilities; hazards due to geometric design features or incompatible uses; or inadequate emergency access. Therefore, the Proposed Program would not have the potential to contribute to cumulative impacts related to these issues.

As discussed in Section 4.13, the construction of a new school or administrative facility would increase student capacity and/or staff employment at a project site, which would generate new vehicle trips. In most cases, development of a new school would occur to accommodate a student population within a cluster where student population may have increased beyond the capacity of the existing schools, or where there may be a lack of schools to accommodate the existing population. For example, increased student population could occur in an area that has experienced a growth in residential development. Therefore, a new school would result in the redistribution of existing VMT, which could reduce overall VMT within the cluster, depending on the school's location. However, because the locations of any new school or administrative facilities are not currently known, the variables contributing to trip length, including the facility location and roadway network configuration, attendance boundary size, and presence and density of residential land uses, are also currently unknown. As such, the potential exists for the operation of a new school or administrative facility to increase VMT within the cluster in which it would be located. Therefore, any increase in capacity has the potential to increase VMT, which could result in a conflict with State CEQA

Guidelines Section 15064.3, subdivision (b). Consequently, new school or administrative facilities have the potential to result in a significant VMT impact under this criterion. Because of the cumulative nature of VMT, this direct project VMT impact would also be considered a cumulative impact of the Proposed Program. Therefore, the Proposed Program's contribution to VMT impacts would be cumulatively considerable (**Impact-C-TRA-1**).

### 5.2.13.4 Level of Significance Prior to Mitigation

**Impact-C-TRA-1: Potential to Generate Increased Vehicle Miles Traveled Within the Program Area Due to Increased Student Capacity or New Staff.** New school or administrative facilities under the Proposed Program have the potential to increase student capacity within a cluster, which could generate an increase in vehicle miles traveled within the Program area. This would be considered a conflict with State CEQA Guidelines Section 15064.3, subdivision (b), which constitutes a potentially significant impact.

### 5.2.13.5 Mitigation Measures

For **Impact-C-TRA-1:**

Implement **MM-TRA-3** and **MM-TRA-4,** as described in Section 4.13, *Transportation.*

### 5.2.13.6 Level of Significance After Mitigation

Even with mitigation, the Proposed Program's incremental contribution to cumulative impacts related to VMTs would be cumulatively considerable because the actual VMT reductions that would be achieved with implementation of these measures cannot be quantified at this programmatic level and it cannot be definitively concluded that these measures would reduce new VMT generation to less-than-significant levels.

## 5.2.14 Tribal Cultural Resources

A cumulatively considerable impact on tribal cultural resources would result if, in combination with buildout of the past, present, and reasonably foreseeable future plans listed in Table 5-1, the Proposed Program's incremental contribution to significant cumulative tribal cultural resource impacts would be considerable.

### 5.2.14.1 Geographic Scope

Impacts on tribal cultural resources are generally site-specific and not additive across a landscape; however, the cultural setting containing tribal cultural resources includes the entire San Diego region.

### 5.2.14.2 Cumulative Effects

The Program area and surrounding communities consist of urban land that has been almost entirely developed with buildings, paving, or park landscape. Therefore, due to the nature of the Program area, it is unlikely that significant tribal cultural resources would be encountered during implementation of the plans in Table 5-1. Any potential tribal cultural resources inadvertently discovered during construction activities would be evaluated and protected in compliance with Assembly Bill (AB) 52. However, past projects within the geographic scope have resulted in the

urban development seen today, which most likely also affected tribal cultural resources that were previously located within those projects' footprints. Because the past and present projects have drastically changed the cultural setting of the immediate region, cumulative impacts from past, present, and probable future projects are cumulatively significant.

### 5.2.14.3 Program Contribution

As discussed in Section 4.14, *Tribal Cultural Resources*, significant tribal cultural resources are potentially present within portions of the Program area, though the specific location is confidential. These resources are not currently listed on the CRHR or a local register of historical resources; however, they could be eligible. Other existing school sites and new acquisition sites within the Program area could also include tribal cultural resources, the location of which is currently unknown. Demolition and construction of new structures associated with the Proposed Program could include varying depths of excavation and ground disturbance. If ground-disturbing activities were to occur in areas identified as sensitive by Jamul Indian Village, these activities could damage or destroy tribal cultural resources, which would be a significant impact. In addition, ground-disturbing activities associated with each of these categories could damage or destroy currently undiscovered tribal cultural resources, which would also be a significant impact. However, with implementation of **MM-TRI-1** and **MM-TRI-2**, these impacts would be reduced to a less-than-significant level because the recommended file search and monitoring of any ground-disturbing activities would minimize potential damage or loss of tribal cultural resources. Therefore, the Proposed Program's impacts related to tribal cultural resources would not be cumulatively considerable.

### 5.2.14.4 Level of Significance Prior to Mitigation

The Proposed Program's incremental contribution to cumulative tribal cultural resources impacts would be less than cumulatively considerable.

### 5.2.14.5 Mitigation Measures

No mitigation is required.

### 5.2.14.6 Level of Significance After Mitigation

The Proposed Program's incremental contribution to cumulative tribal cultural resources impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

## 5.2.15 Utilities and Service Systems

Cumulative impacts on utilities and service systems may occur when the Proposed Program, in combination with buildout of the past, present, and reasonably foreseeable plans identified in Table 5-1 combine to increase demand such that additional services must be provided or additional facilities constructed. This usually would result from the incremental addition of people permanently occupying an area or the incremental construction of new or larger buildings requiring the provision of new or expanded utilities and service systems to meet the new permanent demand. A significant cumulative impact would also result if the Proposed Program were to contribute to impacts that exceeded the planned use and capacity of the wastewater, water, solid waste, and/or

energy service providers for the Proposed Program, which project future supply and demand based on current land use and development projections within their respective service areas.

### 5.2.15.1 Geographic Scope

The geographic scope of cumulative impacts for utilities and service systems includes all areas under the jurisdiction of the plans listed in Table 5-1 that would potentially involve development that would increase demand for utilities and service systems. All of the growth assumptions provided in regional planning documents, such as an urban water management plan (UWMP), would be valid for this discussion.

### 5.2.15.2 Cumulative Effects

As detailed in Section 4.15, *Utilities and Service Systems*, water service in the Program area is provided by the City of San Diego Public Utilities Department's (PUD) Water Branch, which is a member agency of the San Diego County Water Authority, the wholesale water provider for the San Diego Region. Wastewater services are provided by the Metropolitan Sewerage System with three treatment plants treating wastewater generated in the Program area: the North City Water Reclamation Plant (NCWRP), the South Bay Water Reclamation Plant (SBWRP), and the Point Loma Wastewater Treatment Plant (PLWTP).

Given the potential for the density and intensity of development within the community plan areas to increase under the updated regional and community plans, it is possible that demand on utilities would increase such that new or expanded utilities and service systems may be required. Therefore, impacts of past, present, and future projects on utilities and service systems would be cumulatively significant.

### 5.2.15.3 Program Contribution

As discussed in Section 4.15, the construction and operation activities associated with the Proposed Program would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Furthermore, the Proposed Program would not result in insufficient water supplies available to serve the individual projects and reasonably foreseeable future development during normal, dry, and multiple dry years; would not generate a substantial amount of wastewater that would exceed the capacity of existing wastewater facilities; and would not 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; or fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, the Proposed Program's less-than-significant impacts associated with utilities and service systems would not be cumulatively considerable.

### 5.2.15.4 Level of Significance Prior to Mitigation

The Proposed Program's contribution to cumulative impacts related to utilities would not be cumulatively considerable.

### 5.2.15.5 Mitigation Measures

No mitigation is required.

### 5.2.15.6 Level of Significance After Mitigation

The Proposed Program's incremental contribution to cumulative utilities and service systems impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

## 5.2.16 Wildfire

Cumulative impacts on wildfire may occur when the Proposed Program, in combination with buildout of the past, present, and reasonably foreseeable plans identified in Table 5-1 combine to expose people or structures to a significant risk of loss, injury, or death involving wildland fires; substantially impair an adopted emergency response plan or emergency evacuation plan; exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; exacerbate wildfire risks in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones (FHSZ) through the installation or maintenance of associated infrastructure; or 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.

The Proposed Program would not result in significant impacts related to substantially impairing an adopted emergency response plan or emergency evacuation plan; as such, cumulative impacts related to impairing an adopted emergency response plan or emergency evacuation plan are not evaluated.

### 5.2.16.1 Geographic Scope

The geographic scope of the cumulative impact analysis for wildfire includes all areas in a Very High FHSZ within and adjacent to the District's jurisdiction, including adjacent communities. Because of the transitory nature of wildfires, which can burn across multiple landscapes if suitable fuel is present, the geographic scope for cumulative wildfire impacts includes the adjacent City of La Mesa, the City of Lemon Grove, and unincorporated San Diego County.

### 5.2.16.2 Cumulative Effects

Potential cumulative wildfire impacts would result when plans would combine with the Proposed Program to exacerbate wildfire risks located within a Very High FHSZ. The identified cumulative plans in Table 5-1 may be located within or adjacent to a Very High FHSZ. Cumulative growth and development within the Program area would have the potential to expose additional people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Cumulative growth and development could also impair existing emergency response and evacuation plans as a result of an increase in population that is induced from future development projects that are unaccounted for in existing emergency plans; an increase in population that emergency response teams are unable to service adequately in the event of a disaster; or evacuation route impairment if multiple development projects concurrently block multiple evacuation or access roads. Cumulative growth and development in areas adjacent to and surrounding the Program area within areas designated as Very High FHSZ would have the potential to exacerbate wildfire risk by increasing the number of future residents in areas prone to wildfire. In addition, cumulative growth and development could expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. The Proposed Program would not introduce future residents in

areas prone to wildfires, or increase enrollment capacity at any school facilities, nor would it increase the number of District staff at existing administrative facilities. Therefore, impacts related to wildfire from past, present, and reasonably foreseeable future plans would not be cumulatively significant.

### 5.2.16.3 Program Contribution

As discussed under Threshold 1 in Section 4.16, *Wildfire*, the Proposed Program would potentially include the operation of new school or administrative sites that could introduce additional students and staff to District-owned property. If a newly acquired or newly constructed school or administrative facility is located within a Very High FHSZ, it could expose additional students, staff, and structures to hazardous conditions associated with the high risk of wildfire. Furthermore, the addition of more people and structures to an area that is already designated as a Very High FHSZ could exacerbate existing wildfire risks, by increasing the possibility of human-caused wildland fires. Although all new school or administrative sites would operate in compliance with the California Fire Code, this would not reduce the potential impact of increasing the number of people and structures onsite, which would increase the potential for wildfires created from human-related sources. Therefore, operation of the Proposed Program would result in a potentially significant impact related to exposure of people or structures, either directly or indirectly, to a significant loss, injury, or death involving wildland fires. Although implementation of **MM-WF-1** and **MM-WF-2**—which would require the preparation of a construction Fire Protection Plan (CFPP) and an operations FPP—would reduce both construction- and operation-related impacts associated with wildfire risk, locations of future site acquisitions and new school or administrative facilities under the Proposed Program are unknown, and the potential wildfire-related risks are also unknown. Without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of an FPP would effectively reduce the potential impacts to less than significant. Impacts would be significant and unavoidable. However, because the Proposed Program would not introduce future residents in areas prone to wildfires, or increase enrollment capacity at any school facilities, nor would it increase the number of District staff at existing administrative facilities, the Proposed Program's impacts related to exposing additional students, staff, and structures to hazardous conditions associated with the high risk of wildfire would not be cumulatively considerable.

As discussed under Threshold 3 in Section 4.16, construction activities associated with the Proposed Program located within Very High FHSZs could result in a potentially significant impact related to exacerbating wildfire risks of, and thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire Because the exact location and details of any new school or administrative sites proposed under the Proposed Program are unknown at this time, it cannot be guaranteed that the potential siting of any new facility within a Very High FHSZ would not exacerbate wildfire risk, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Although implementation of **MM-WF-1** and **MM-WF-2** would require the District to prepare a CFPP and FPP to minimize potential construction- and operation-related impacts associated with wildfire risk, without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of an CFPP and FPP would effectively reduce the potential impacts to less than significant. Therefore, impacts would

be significant and unavoidable. However, because the Proposed Program would not introduce future residents in areas prone to wildfires, or increase enrollment capacity at any school facilities, nor would it increase the number of District staff at existing administrative facilities, the Proposed Program's impacts related to exposing additional students, staff, and structures to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would not be cumulatively considerable.

As discussed under Threshold 4 in Section 4.16, the Proposed Program may include construction of infrastructure that would exacerbate wildfire risk or result in additional temporary or permanent impacts. Although implementation of **MM-WF-1** and **MM-WF-2** would require the District to prepare a CFPP and FPP to mitigate the risk of wildfire impacts related to utility construction, without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of an CFPP and FPP would effectively reduce the potential impacts to less than significant. Therefore, impacts would be significant and unavoidable. However, because the Proposed Program would not introduce future residents in areas prone to wildfires, or increase enrollment capacity at any school facilities, nor would it increase the number of District staff at existing administrative facilities, the Proposed Program's impacts related to the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment would not be cumulatively considerable.

As discussed under Threshold 5 in Section 4.16, the Proposed Program would include the construction and operation of new acquisitions and new school or administrative facilities within a Very High FHSZ and an area prone to flood, landslide, or slope instability. As a result, the Proposed Program could introduce new staff, students, faculty, and structures into an area highly susceptible to landslides or slope instability after a wildfire event. Although, implementation of **MM-WF-1** and **MM-WF-2** would require the preparation of a CFPP and a FPP to reduce the potential to exacerbate wildfire risks, without knowing the type and severity of potential wildfire-related risks, it cannot be guaranteed that the preparation and implementation of an CFPP and FPP would effectively reduce the potential impacts to less than significant. Therefore, impacts would be significant and unavoidable. However, because the Proposed Program would not introduce future residents in areas prone to wildfires, or increase enrollment capacity at any school facilities, nor would it increase the number of District staff at existing administrative facilities, the Proposed Program's impacts related to exacerbating the risk of post-fire hazards, either during construction or operation, would not be cumulatively considerable.

### 5.2.16.4 Level of Significance Prior to Mitigation

The Proposed Program's incremental contribution to cumulative wildfire impacts would be less than cumulatively considerable.

### 5.2.16.5 Mitigation Measures

No mitigation is required.

### 5.2.16.6 Level of Significance After Mitigation

The Proposed Program's incremental contribution to cumulative wildfire impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

Chapter 6
# Additional Considerations

## 6.1 Introduction

This chapter addresses the potential for additional consequences related to the implementation of the Proposed Program, pursuant to State CEQA Guidelines 15126.2(c), (d), (e)[1] and 15128. Specifically, this chapter (1) addresses significant irreversible changes to the environment that would result from implementation of the Proposed Program; (2) discusses growth-inducing impacts of the Proposed Program, which pertain to ways in which the Proposed Program could promote either direct or indirect growth; and (3) discusses the environmental effects of the Proposed Program that were determined not to be significant during the initial environmental review process.

## 6.2 Significant Irreversible Environmental Changes

The Proposed Program does not involve the adoption of an amendment, or enactment of a plan, policy, or ordinance, and, therefore, pursuant to State CEQA Guidelines Section 15127, the PEIR is not required to comply with State CEQA Guidelines Section 15126.2(c). However, the Proposed Program would involve adoption of the *SDUSD CEQA Guidelines and Comprehensive Mitigation Plan for District Facilities* and establishment and implementation of the District's Capital Improvement Program to repair, renovate, and revitalized District schools and administrative facilities across the 208 square-mile Program area. Given the large area and the wide range of project categories, the Proposed Program is similar in scope to a plan, and, therefore, this PEIR complies with Section 15126.2(c) of the State CEQA Guidelines.

Section 15126.2(c) requires that an EIR identify any significant irreversible environmental changes resulting from implementation of a proposed project. Irreversible commitments of resources are also evaluated to ensure that their use is justified. Irreversible environmental changes typically fall into three categories: primary impacts, such as the use of nonrenewable resources; secondary impacts, such as highway improvements that provide access to previously inaccessible areas; and environmental accidents associated with a project.

As noted above, the Proposed Program involves implementation of the District's Capital Improvement Program, which involves six overarching categories of improvements ranging from new site acquisitions and new school construction to upgrades of existing campuses. All project categories except for new site acquisitions would be contained within the boundaries of an existing District property. However, given the urbanized and built-out nature of the Program area, new site acquisitions would also occur within an urbanized area.

Most of the project categories would involve improvements that would all be reversible once the improvements are no longer needed or are outdated. However, the proposed demolition activities

[1] The requirements of State CEQA Guidelines Section 15126.2(a) are met in Chapter 4, *Environmental Analysis*, and Chapter 5, *Cumulative Impacts*, under each resource discussion. Additionally, the requirements of State CEQA Guidelines Section 15126.2(b) are met in Section 4.5, *Energy*.

are irreversible changes, and, as such, demolition of existing buildings, parking lots, utilities, landscaping, etc. would be considered irreversible changes.

Implementation of the Proposed Program would require a permanent commitment of non-renewable natural resources primarily from the direct consumption of fossil fuels. These fossil fuels would be consumed during construction in the form of diesel and gasoline used in construction equipment and commute vehicles.

Electricity would also be consumed during construction and operation from power tools, electric equipment, and heating, ventilation, and air conditioning (HVAC) units, although not all of it would be from non-renewable sources. The portion of electricity generated from fossil fuels such as natural gas, however, would be irretrievable and irreversible.

Although the Proposed Program would use non-recoverable materials and energy during construction and operation activities, the amounts needed would be accommodated by existing supplies and infrastructure. Therefore, the Proposed Program's potential to result in irreversible environmental changes is primarily related to the use of fossil fuels for construction and operation. However, as discussed in Section 4.5, *Energy*, impacts on energy would not be significant with implementation of the Proposed Program.

In addition, as discussed within Chapter 4, *Environmental Analysis*, and Chapter 5, *Cumulative Impacts*, implementation of the Proposed Program would result in significant and unavoidable environmental changes related to aesthetic resources, air quality, cultural resources, greenhouse gas emissions, noise and vibration, transportation, and wildfire. No other significant impacts were identified.

## 6.3 Growth-Inducing Impacts

State CEQA Guidelines Section 15126.2(e) requires that an EIR discuss the ways in which a proposed project could directly or indirectly foster economic growth, population growth, or additional housing, and how that growth would affect the surrounding environment. Direct growth inducement would result if a project, for example, involved construction of new housing. Indirect growth might occur if a project were to establish substantial new permanent employment opportunities that would stimulate the need for additional housing, utilities, and public services.

Similarly, a project would indirectly induce growth if it would remove an obstacle to additional development, such as removing a constraint on a required public service or utility. A project proposing to expand water supply capabilities in an area where limited water supply has historically restrained growth would be considered growth-inducing.

This section discusses the characteristics and consequences of the Proposed Program that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. However, the following analysis does not assume that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment (State CEQA Guidelines 15126.2(e)). Rather, Chapters 4 and 5 discuss the adverse impacts on resources, including any caused by cumulative conditions.

### 6.3.1 Economic Growth

One criterion by which growth inducement can be measured involves economic growth. Economic growth considerations include a demand for temporary and permanent employees, which the Proposed Program would foster through the creation of new jobs.

In the short term, construction associated with the Proposed Program would directly induce economic growth by introducing temporary employment opportunities. These short-term workers would likely patronize businesses in the Program area and in the larger San Diego region, resulting in indirect economic benefits.

In the long term, operation of the Proposed Program is not anticipated to foster substantial economic growth. The acquisition of new school sites would accommodate existing and/or projected student populations within a cluster and may require hiring additional teachers or administrative staff. Staffing needs are determined on an annual basis, and new teachers or staff are anticipated to be drawn from the existing teacher/administrative staff professionals in the San Diego region. While this would create a minimal number of new permanent jobs, which would increase the spending abilities of those individuals, this would not generate a large source of new economic growth. Additionally, none of the other project categories would foster substantial economic growth, as the improvements would serve the existing student population at the school and would not require new teachers or administrative staff. Therefore, operation of the Proposed Program would not induce substantial economic growth.

### 6.3.2 Population Growth

The Proposed Program would not include development of new housing or other population-generating uses that would directly induce population growth or attract a substantial number of workers. In addition, it would not affect the capacity of existing community service facilities, thereby requiring the construction of new facilities, which could cause significant environmental effects. The Proposed Program would include acquisitions of new schools, including charter schools; and whole-site modernization of existing schools, including athletic fields, gymnasiums, and administrative facilities. The Proposed Program would not directly induce new residential development or result in population growth in the Program area.

### 6.3.3 Construction of Additional Housing

The Proposed Program does not call for the construction of housing, nor would it increase the population in a manner that would necessitate the construction of additional housing. Similarly, the Proposed Program would not remove existing housing.

### 6.3.4 Removal of Obstacles to Population Growth

As stated above, a project would indirectly induce growth if it would remove a constraint on a required public service or utility. A project would also indirectly induce growth if it would establish a precedent-setting action (e.g., an innovation, a change in zoning, a general plan amendment approval).

For acquisition of new school sites, some extension of utilities and transportation infrastructure could be required. However, new school sites would not be located in expanses of open space and

would be within developed areas with existing infrastructure. Therefore, the Proposed Program would not involve "leapfrog" development that could induce population growth.

### 6.3.5 Summary of Growth-Inducing Impacts

For most project categories under the Proposed Program, student enrollment would not increase. While the Proposed Program would increase student enrollment at the sites of new school construction, these facilities would be accommodating the existing student population in that community. In the short term, construction activities occurring under implementation of the Proposed Program would directly induce economic growth by introducing temporary employment opportunities. The Proposed Program could also provide new permanent jobs in the San Diego area, which would be drawn largely from the existing population. These new jobs may generate a modest demand for move-up housing due to the new jobs that would be created. However, the Proposed Program would not directly induce population growth or directly cause the construction of new housing in the region. Overall, the Proposed Program would have a minimal but measurable effect on regional growth.

## 6.4 Effects Found Not to Be Significant

During preparation of the Initial Study/Notice of Preparation (IS/NOP), the District determined that the Proposed Program would result in no impacts or less-than-significant impacts for the following resource areas and, therefore, eliminated them from further analysis in this PEIR (see Appendix B):

- Agriculture and Forestry Resources
- Mineral Resources
- Population and Housing
- Public Services

In accordance with State CEQA Guidelines Section 15128, a brief explanation indicating the reasons that the effects on these resources would not be significant is provided under each subheading below. In addition, while the IS/NOP identified a potentially significant impact for Land Use and Planning, it was determined during preparation of this PEIR that the Proposed Program would result in no impacts or less-than-significant impacts for Land Use and Planning, and thus no further analysis was required in the PEIR. The rationale for this determination is provided below.

### 6.4.1 Agriculture and Forestry Resource

#### 6.4.1.1 Agriculture Resources

Implementation of the Proposed Program would have no impact on agriculture or forestry resources. The Program area is in an urbanized area that contains limited amounts of farmlands or agricultural resources. According to the California Department of Conservation's San Diego County Important Farmland 2016 map, most of the Program area is classified as "Urban and Built-Up Land," and "Other Land," which do not contain areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation 2016). While there is Farmland of Local Importance in the northern portion of the city and a small area of Unique Farmland near Marine Corps Air Station Miramar Airport, both are outside of the Program area

boundaries (City of San Diego 2007). Any new schools acquired and developed would be sited in urbanized areas, as they would be intended to serve as neighborhood schools.

Regarding Williamson Act contracts, 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 Program area is not zoned for agricultural use, nor are there Williamson Act contracts within the Program area (California Department of Conservation 2013). Additionally, there are no Williamson Act contract eligible lands in the Program area. As noted above, new site acquisitions would occur in urbanized areas with the intention to develop schools for existing neighborhoods and would not involve properties that are the subject of a Williamson Act contract.

Based on the above, the Proposed Program would result in no impacts on agricultural resources.

#### 6.4.1.2 Forestry Resources

The District boundaries are entirely within the City of San Diego, which does not contain any forest land, timberland, or timberland zoned Timberland Production. All of the District schools are in urbanized areas where there are no forestry resources. Construction and operation activities that would be reasonably foreseeable with implementation of the Proposed Program would occur primarily at existing school and administrative facilities, which are classified as "Urban and Built-Up Land" or "Other Land," and are not zoned as forest land, timberlands, or timberland zoned Timberland Production (California Department of Conservation 2016). In addition, any new schools acquired and developed would be sited in urbanized areas, as they would be intended to serve as neighborhood schools. The Proposed Program would not conflict with existing zoning for, or cause rezoning of, forest land or timberland resources. No impacts on these resources would occur from implementation of the Proposed Program.

### 6.4.2 Land Use and Planning

#### 6.4.2.1 Established Community

As discussed in the IS/NOP, development occurring under the Proposed Program would occur within the boundaries of existing school sites, or if new school sites are acquired, development would occur within the boundaries of the acquired parcels. Improvements to or construction of new schools would not involve features, such as new roadways or major utility installations, that would divide established communities. The Proposed Program would result in no impacts related to the division of established communities.

#### 6.4.2.2 Applicable Land Use Plan, Policy, or Regulation

Development within existing school sites that would be reasonably foreseeable with implementation of the Proposed Program would not result in any changes to the current land uses, as the schools would still function as educational facilities. If new school sites are acquired and developed, these new schools would be consistent with applicable land use plans, policies, and regulations. In addition, Government Code Section 53094 authorizes the governing board of a school district, by two-thirds vote, to determine a city and/or county land use and zoning ordinance inapplicable to the

proposed use of a certain property for educational purposes. Therefore, the District is not bound by local land use and zoning requirements for educational facilities.

However, improvements to existing or construction of new administrative or other non-educational facilities owned by the District would not be exempt from the City's land use and zoning ordinances. For example, modernization and other facility improvements could occur at the Eugene Brucker Educational Center, which houses administrative, personnel, school security, and other departments needed to operate the 121,000-student district. Although non-educational facilities would be required to comply with City land use and zoning regulations, the potential exists for improvements to or construction of administrative facilities or other non-educational facilities to conflict with plans, policies, or regulations adopted for the purposes of avoiding or mitigating an environmental effect.

The Program area is contained entirely within the City of San Diego and administrative and non-educational facilities would be subject to the City of San Diego General Plan, which designates schools and ancillary uses under the "Institutional, Public and Semi-Public Facilities" land use designation. In addition, San Diego has more than 50 planning areas, each with a community or subarea plan that refines citywide goals and policies to address issues unique to the individual communities (City of San Diego 2019). While state law exempts charter cities (including San Diego) from the requirement that zoning be consistent with the General Plan land use map, it is the City of San Diego's practice to apply zoning that is consistent with community plan land use designations to ensure their implementation. The City's adopted land use plans provide guidance and set the framework for the implementing regulations found in the Land Development Code. Furthermore, portions of the Program area also fall within the Coastal Zone and would be subject to the Local Coastal Program (LCP) for those communities as well. Community planning areas wholly or partially located within the Coastal Zone include: Barrio Logan/Harbor 101, Ocean Beach, Carmel Valley, Otay Mesa/Nestor, Del Mar Mesa, Pacific Beach, La Jolla, Pacific Highlands Ranch, Midway/Pacific Highway Corridor, Peninsula, Mira Mesa, Torrey Hills, Mission Bay Park, Tijuana River Valley, Mission Beach, Torrey Pines, North City Future Urbanizing Area, San Dieguito River Valley, North City Local Coastal Program, and University.

The General Plan Land Use Element contains the following goals and policies related to schools that would be applicable to the Proposed Program.

> LU-F.2. Review public and private projects to ensure that they do not adversely affect the General Plan and community plans. Evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, and other General Plan and community plan policies including open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities.
>
> LU-H.1. Ensure development of balanced communities that take into account community-wide involvement and participation.
>
> c. Recognize the important role that schools play in neighborhood life and look for opportunities to form closer partnerships among local schools, residents, neighborhood groups, and the City with the goal of improving public education.
>
> LU-I.6. Provide equal access to public facilities and infrastructure for all community residents.
>
> PF.A.3.d. Include in financing plans a variety of facilities to effectively and efficiently meet the needs of diverse communities.

3. Promote the joint use of facilities, services, and programs, including schools, parks, recreational centers and facilities, libraries, child care facilities, and others.

Because administrative facilities or other non-educational facilities would require review by the City, these Program categories would be consistent with Policy LU-F.2, which would ensure that these facilities are consistent with the land uses, development standards, and design guidelines of the General Plan, the Land Development Code, and the community plan (and/or LCP) in which the facility is located. Therefore, the Proposed Program would not conflict with that policy. In addition, the Proposed Program would support policies related to forming closer partnerships with the City and neighborhood groups and increasing access to public facilities. Therefore, impacts related to applicable plans, policies, or regulations related to implementation of the Proposed Program would be less than significant.

## 6.4.3 Mineral Resources

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

## 6.4.4 Population and Housing

### 6.4.4.1 Population Growth

The Proposed Program would not facilitate the construction of any homes or businesses or extension of roads or other infrastructure. Repair, renovation, or revitalization of existing school and administration facilities, or the construction of a new school, would be conducted to accommodate existing growth in the region and would not induce unplanned population growth. Development activities that would be reasonably foreseeable with implementation of the Proposed Program would result in the generation of temporary construction jobs; however, the additional jobs are expected to be filled by individuals currently residing in the San Diego region. The jobs would not result in the relocation of any population. In addition, the Proposed Program would increase permanent employment at new school sites (faculty, administrative staff, etc.); however, similar to temporary construction jobs, these employees are expected to be drawn from the existing residents of San Diego and the surrounding area and would have little to no effect on the inducement of population growth. Therefore, the Proposed Program would not directly or indirectly

induce substantial unplanned population growth through the creation of new homes or businesses in the San Diego region. No impacts would occur.

#### 6.4.4.2 Housing

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

### 6.4.5 Public Services

Fire protection services within the Program area are currently provided by the San Diego Fire-Rescue Department, and the San Diego Police Department provides police protection services in the City. Numerous parks and other public facilities are located throughout the Program area, and the Proposed Program itself is associated with schools and related educational facilities.

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

Chapter 7
# Alternatives

## 7.1 Overview

This chapter describes and analyzes a range of reasonable alternatives that could feasibly attain most of the basic project objectives while avoiding or substantially lessening one or more of the significant effects of the Proposed Program. The primary purpose of this chapter is to ensure that the comparative analysis provides sufficient detail to foster informed decision-making and public participation in the environmental process.

Section 15126.6(a) of the State CEQA Guidelines requires an EIR to analyze a range of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project but which would avoid or substantially lessen any of the significant effects of the project." Alternatives analysis must also include a brief comparative evaluation of the "No Project Alternative," which assumes that the proposed discretionary action is not approved. The factors that may be taken into account when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, and whether access to the alternative site can be reasonably acquired or controlled (State CEQA Guidelines Section 15126.6(f)(1)). Alternative locations may be analyzed if the lead agency determines that implementation of a project on an offsite location is possible. The decision to select alternative locations needs to be based on whether offsite locations will avoid or substantially reduce any of the significant effects of the project. The lead agency may also make the determination that no feasible alternative locations exist; the reasoning behind this determination must be disclosed in the alternatives analysis.

Three alternatives to the Proposed Program are analyzed in this chapter and discussed in terms of their merits relative to the Proposed Program. A discussion of each alternative is provided below and includes the following.

- Alternative 1—No Project Alternative
- Alternative 2 – No New Site Acquisition and New School or Administrative Facilities Alternative
- Alternative 3—Only Whole Site Modernization and Upgrades of Existing School and Administrative Sites Alternative

In developing alternatives that meet the requirements of CEQA, the starting point is the Proposed Program's objectives. The Proposed Program includes the following objectives.

1. Meet the Board of Education Vision 2020 plan to develop a quality school in every neighborhood by facilitating approval of the following at specific school sites.
    - Improving school security, emergency communications, controlled-entry points, and door locks so that students and staff have the right to a safe and secure campus where they are free from physical and psychological harm.
    - Upgrading classrooms/labs for vocational/career, science, technology, and math education to provide for a unique opportunity for in-depth studies in a specific area of interest.

- Repairing foundations, bathrooms, and plumbing to provide healthful, safe, and adequate facilities that enhance the instructional program.
- Removing lead in drinking water and hazardous asbestos to provide a safe and healthy environment at school facilities for students, staff, and community members.
- Acquiring property for neighborhood and charter schools to best serve the District's educational needs in accordance with the District's Long-Range Facilities Master Plan and State law, to provide diverse learning opportunities for District students, and to accommodate and contribute to other community needs.

2. Allow for the continued implementation of repairs, renovations, and/or upgrades of specific school sites and facilities consistent with requirements specified in funding mechanisms and to ensure that the adequacy, design, and conditions of existing District facilities meet the needs of the instructional program and to maintain clean and inviting schools that are worthy of our students and families.
3. Facilitate agreements with any public agency, public institution, and/or community organization for use of community facilities for school programs or to make school facilities or grounds available for use by those entities and allow for community and school use of District athletic fields and lighted stadiums in a way that maximizes benefits to the school and its students while minimizing negative impacts on the surrounding community.
4. Develop District-specific CEQA guidelines and criteria, and standard construction and operating procedures to allow for a consistent streamlined process for future environmental reviews of specific school capital improvement and maintenance projects in order to maximize efficiency and provide updated facilities for students as quickly as possible.
5. Improve and modernize District facilities to retain and encourage students to return to their neighborhood schools.

CEQA also requires that alternatives be feasible. *Feasible* is defined in CEQA as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (Public Resources Code Section 21061.1). The State CEQA Guidelines elaborate that factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (State CEQA Guidelines Section 15126.6(f)(1)).

Finally, the alternatives should also avoid or substantially lessen one or more significant environmental impacts that would occur under the project. As such, this analysis focuses on issues discussed in Sections 4.1 through 4.16 of this PEIR because of their potential to result in significant impacts on the environment. Issues discussed in Chapter 6, *Additional Consequences of Program Implementation*, are not carried forward into this alternatives analysis because it was determined during the preparation of this PEIR that they would result in less-than-significant impacts or no impacts on the environment. Table 7-1 summarizes the significant environmental impacts that would occur from implementation of the Proposed Program.

**Table 7-1. Summary of Significant Effects of the Proposed Program**

| Resource Impact | Significant and Unavoidable | Less than Significant with Mitigation |
|---|---|---|
| **Section 4.1, Aesthetics** | | |
| **Impact-AES-1:** Potential to Result in Adverse Effects on Views Within a Vista Area During Construction of New School or Administrative Facilities. | X | |
| **Impact-AES-2**: Potential to Result in Adverse Effects on Views Within a Vista Area During Operation of New School or Administration Facilities. | X | |
| **Impact-AES-3:** Potential to Result in Adverse Effects on Views Within a Vista Area During Construction of Whole Site Modernizations. | X | |
| **Impact-AES-4:** Potential to Result in Adverse Effects on Views Within a Vista Area During Operation of Existing District Sites and Facilities. | X | |
| **Impact-AES-5:** Potential to Damage Scenic Resources Within an Eligible or Officially Designated State Scenic Highway During New Construction. | X | |
| **Impact-AES-6:** Potential to Damage Scenic Resources Within an Eligible or Officially Designated State Scenic Highway. | X | |
| **Impact-AES-7**: Degradation of Visual Character and Quality During Construction | | X |
| **Impact-AES-8:** Substantial Increase of Nighttime Lighting. | X | |
| **Section 4.2, Air Quality and Health Risk** | | |
| **Impact-AQ-1:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of New School or Administrative Facilities. | X | |
| **Impact-AQ-2:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of Whole Site Modernization Projects. | X | |
| **Impact-AQ-3:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of Upgrades of Existing School and Administrative Sites | X | |
| **Impact-AQ-4:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction of Joint-Use Facilities | X | |
| **Impact-AQ-5:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Operation of Joint-Use Facilities. | | X |

| Resource Impact | Significant and Unavoidable | Less than Significant with Mitigation |
|---|---|---|
| **Impact-AQ-6:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Construction. | X | |
| **Impact-AQ-7:** Potential to Result in a Cumulatively Net Increase of Any Criteria Pollutant for which the Project Region is a Nonattainment Area for an Applicable Federal or State Ambient Air Quality Standard During Operation. | X | |
| **Impact-AQ-8:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites. | X | |
| **Impact-AQ-9:** Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites. | X | |
| **Impact-AQ-10:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of New School and Administrative Facilities, Whole Site Modernizations, and Upgrades of Existing School and Administrative Sites. | X | |
| **Impact-AQ-11:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of Joint-Use Facilities. | X | |
| **Impact-AQ-12:** Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of Joint-Use Facilities. | X | |
| **Impact-AQ-13:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of Joint-Use Facilities. | X | |
| **Impact-AQ-14:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of Buildout of the Proposed Program. | X | |
| **Impact-AQ-15:** Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of Buildout of the Proposed Program. | X | |
| **Impact-AQ-16:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of Buildout of the Proposed Program. | X | |
| **Impact-AQ-17:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Construction of Near-Term, Site-Specific Whole Site Modernization Projects. | X | |
| **Impact-AQ-18:** Potential to Expose Sensitive Receptors to Substantial Toxic Air Contaminant Emissions During Construction of Near-Term, Site-Specific Whole Site Modernization Projects. | X | |

| Resource Impact | Significant and Unavoidable | Less than Significant with Mitigation |
|---|---|---|
| **Impact-AQ-19:** Potential to Expose Sensitive Receptors to Substantial Criteria Pollutant Concentrations During Operation of Near-Term, Site-Specific Whole Site Modernization Projects. | X | |
| **Impact-AQ-20:** Potential to Result in Other Emissions (Such as Those Leading to Odors) Adversely Affecting a Substantial Number of People During Operation. | | X |
| **Section 4.3, Biological Resources** | | |
| **Impact-BIO-1:** Potential to Have a Direct Substantial Adverse Effect on Any Sensitive Species During Construction of New School or Administrative Facilities. | | X |
| **Impact-BIO-2:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of New School or Administrative Facilities. | | X |
| **Impact-BIO-3:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of New School or Administrative Facilities. | | X |
| **Impact-BIO-4:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Operation of New School or Administrative Facilities. | | X |
| **Impact-BIO-5:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Operation of New School or Administrative Facilities. | | X |
| **Impact-BIO-6:** Potential to Have a Direct Substantial Adverse Effect on Any Sensitive Species During Construction of Whole Site Modernization Projects**.** | | X |
| **Impact-BIO-7:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Whole Site Modernization Projects. | | X |
| **Impact-BIO-8:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of Whole Site Modernization Projects. | | X |
| **Impact-BIO-9:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Operation of Whole Site Modernization Projects. | | X |
| **Impact-BIO-10:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Operation of Whole Site Modernization Projects. | | X |
| **Impact-BIO-11:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities. | | X |
| **Impact-BIO-12:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Construction of Upgrades of Existing School and Administrative Sites or Joint-Use Facilities. | | X |
| **Impact-BIO-13:** Potential to Have a Direct Substantial Adverse Effect on Any Sensitive Species During Construction of Joint-Use Facilities. | | X |

| Resource Impact | Significant and Unavoidable | Less than Significant with Mitigation |
|---|---|---|
| **Impact-BIO-14:** Potential to Have an Indirect Substantial Adverse Effect on Multi-Habitat Planning Area Lands During Operation of Joint-Use Facility Projects. | | X |
| **Impact-BIO-15:** Potential to Have an Indirect Substantial Adverse Effect on Native Vegetation During Operation of Joint-Use Facility Projects. | | X |
| **Impact-BIO-16:** Potential to Have an Adverse Effect on Any Riparian or Other Sensitive Vegetation Community Identified in Local or Regional Plans, Policies, or Regulations, or by the California Department of Wildlife or U.S. Fish and Wildlife Service. | | X |
| **Impact-BIO-17:** Potential to Have an Adverse Effect on State or Federally Protected Wetlands (Including, But Not Limited to, Marshes, Vernal Pools, and Coastal Wetlands) Through Direct Removal, Filling, Hydrological Interruption, or Other Indirect Means. | | X |
| **Impact-BIO-18**: Potential to Have an Adverse Effect on State or Federally Protected Wetlands (Including, But Not Limited to, Marshes, Vernal Pools, and Coastal Wetlands) Through Direct Removal, Filling, Hydrological Interruption, or Other Indirect Means. | | X |
| **Impact-BIO-19**: Potential to 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 During Construction. | | X |
| **Impact-BIO-20:** Potential to 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 During Construction. | | X |
| **Impact-BIO-21:** Potential to Conflict With Any Local Policies or Ordinances Protecting Biological Resources, Such as a Tree Preservation Policy or Ordinance, During Construction. | | X |
| **Section 4.4, Cultural Resources** | | |
| **Impact-CUL-1**: Potential to Cause a Substantial Adverse Change in the Significance of a Historical Resource through Demolition and Construction of a New School or Administrative Facility. | X | |
| **Impact-CUL-2**: Potential to Cause Substantial Adverse Change in the Significance of a Historical Resource through Physical Alteration During Construction of a New School or Administrative Facility. | X | |
| **Impact-CUL-3:** Potential to Cause a Substantial Adverse Change in the Significance of a Historical Resource through Demolition and Construction of Existing District Facilities. | X | |
| **Impact-CUL-4:** Potential to Cause Substantial Adverse Change in the Significance of a Historical Resource through Physical Alteration of Existing District Facilities. | X | |

| Resource Impact | Significant and Unavoidable | Less than Significant with Mitigation |
|---|---|---|
| **Impact-CUL-5:** Disturbance and/or Destruction of Previously Recorded and/or Undiscovered Archaeological Resources During Construction Related to New Acquisition and New School or Administrative Facilities. | | X |
| **Impact-CUL-6:** Disturbance and/or Destruction of Previously Recorded and/or Undiscovered Archaeological Resources. | | X |
| **Impact-CUL-7:** Disturbance and/or Destruction of Significant Archaeological Resources. | | X |
| **Section 4.5, Energy** | | |
| **Impact-EN-1:** Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of New School or Administrative Facilities. | | X |
| **Impact-EN-2:** Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Whole Site Modernization Projects. | | X |
| **Impact-EN-3:** Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Upgrades of Existing School and Administrative Sites. | | X |
| **Impact-EN-4:** Potential Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources During Construction of Joint-Use Facilities. | | X |
| **Impact-EN-5:** Inconsistency with District Environmental Sustainability Goals. | | X |
| **Section 4.6, Geology and Soils** | | |
| **Impact GEO-1:** Potential to Result in Substantial Soil Erosion or the Loss of Topsoil During Construction of New School or Administrative Facilities. | | X |
| **Impact GEO-2:** Potential to Result in Substantial Soil Erosion or the Loss of Topsoil during Construction of Whole Site Modernizations or Joint-use Facilities. | | X |
| **Section 4.7, Greenhouse Gas Emissions** | | |
| **Impact-GHG-1:** Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environmental During Construction | X | |
| **Impact-GHG-2:** Potential to Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment During Operation | X | |
| **Impact-GHG-3:** Potential to Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases | X | |
| **Section 4.8, Hazards and Hazardous Materials** | | |
| **Impact-HAZ-1:** Encounter Hazardous Materials During Construction at New Acquisition Sites | | X |
| **Impact-HAZ-2**: Encounter Contamination or Munitions on Sites Listed as Formerly Used Defense Sites | | X |

| Resource Impact | Significant and Unavoidable | Less than Significant with Mitigation |
|---|---|---|
| **Impact-HAZ-3**: Encounter Hazardous Materials During Ground-Disturbing Activities. | | X |
| **Impact-HAZ-4:** Encounter Lead or Organochlorine Pesticides in Soil During Construction | | X |
| **Impact-HAZ-5:** Encounter Contamination or Munitions on Sites Listed as Formerly Used Defense Sites | | X |
| **Impact-HAZ-6**: Encounter Contamination or Munitions at Madison High School During Ground-Disturbing Activities. | | X |
| **Impact-HAZ-7:** Interfere with Federal Aviation Administration Communication. | | X |
| **Impact-HAZ-8:** Conflict with Regulations Applicable to Review Area 1. | | X |
| **Impact-HAZ-9:** Conflict with Regulations Applicable to Review Area 2. | | X |
| **Section 4.9, Hydrology and Water Quality** | | |
| **Impact-HWQ-1:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of New School or Administrative Facilities. | | X |
| **Impact-HWQ-2:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of New School or Administrative Facilities. | | X |
| **Impact-HWQ-3:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of Whole Site Modernization Projects. | | X |
| **Impact-HWQ-4:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of Whole Site Modernization Projects. | | X |
| **Impact-HWQ-5:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Construction of Joint-Use Facilities. | | X |
| **Impact-HWQ-6:** Potential to Violate Water Quality Standards or Waste Discharge Requirements During Operation of Joint-Use Facilities. | | X |
| **Impact-HWQ-7:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of New Acquisition and New School or Administrative Facilities. | | X |
| **Impact-HWQ-8:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of New Acquisition and New School or Administrative Facilities. | | X |
| **Impact-HWQ-9:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of Whole Site Modernization Projects. | | X |
| **Impact-HWQ-10:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of Whole Site Modernization Projects. | | X |

| Resource Impact | Significant and Unavoidable | Less than Significant with Mitigation |
|---|---|---|
| **Impact-HWQ-11:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Construction of Joint-Use Facilities. | | X |
| **Impact-HWQ-12:** Potential to Result in Substantial Erosion or Siltation On or Off Site During Operation of Joint-Use Facilities. | | X |
| **Impact-HWQ-13:** Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Construction of New School or Administrative Facilities. | | X |
| **Impact-HWQ-14:** Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of New School or Administrative Facilities. | | X |
| **Impact-HWQ-15:** Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Construction of Whole Site Modernization Projects. | | X |
| **Impact-HWQ-16:** Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of Whole Site Modernization Projects. | | X |
| **Impact-HWQ-17:** Potential to Result in Substantial Flooding On or Off Site or Impede or Redirect Flood Flows During Operation of Joint-Use Facilities. | | X |
| **Impact-HWQ-18:** Potential for New School and Administrative Facilities to 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 During Construction. | | X |
| **Impact-HWQ-19:** Potential for New School and Administrative Facilities to 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 During Operation. | | X |
| **Impact-HWQ-20:** Potential for Whole Site Modernization Projects to 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 During Construction. | | X |
| **Impact-HWQ-21:** Potential for Whole Site Modernization Projects to 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 During Operation. | | X |
| **Impact-HWQ-22:** Potential for Joint-Use Facilities to 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 During Construction. | | X |
| **Impact-HWQ-23:** Potential for Joint-Use Facilities to 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 During Operation. | | X |

| Resource Impact | Significant and Unavoidable | Less than Significant with Mitigation |
|---|---|---|
| **Section 4.10, Noise and Vibration** | | |
| **Impact-NOI-1:** Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of New School or Administrative Facilities. | X | |
| **Impact-NOI-2:** Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to New School or Administrative Facilities | X | |
| **Impact-NOI-3:** Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips at New School or Administrative Facilities. | X | |
| **Impact-NOI-4:** Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code During Operation of New School or Administrative Facilities. | X | |
| **Impact-NOI-5:** Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of Whole Site Modernization Projects. | X | |
| **Impact-NOI-6:** Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to Whole Site Modernization Projects. | X | |
| **Impact-NOI-7:** Increase Traffic Noise by 3 Decibels Community Noise Equivalent Level or More that Would Result in Excessive Noise Levels at Residences or Other Offsite Noise-Sensitive Receptors Due to Additional Vehicle Trips or Altered Traffic Patterns. | X | |
| **Impact-NOI-8:** Generate a Noticeable Increase (3 Decibels or More) in Noise Levels at a Noise-Sensitive Offsite Land Use that Would Result in a Noise Level Greater Than the Limits Specified in the City of San Diego Municipal Code During Operation of an Existing District Facility. | X | |
| **Impact-NOI-9:** Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction Activities Associated with Upgrades of Existing School and Administrative Sites. | X | |
| **Impact-NOI-10:** Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Related to Upgrades of Existing School and Administrative Sites. | X | |
| **Impact-NOI-11:** Exceed the City of San Diego Municipal Code Construction Noise Limits at Residences or Other Offsite Noise-Sensitive Receptors During Construction of Joint-Use Facilities. | X | |

| Resource Impact | Significant and Unavoidable | Less than Significant with Mitigation |
|---|---|---|
| **Impact-NOI-12:** Exceed 75 A-Weighted Decibels 12-Hour Equivalent Sound Level at Occupied Onsite Learning Spaces Due to Construction Activities Associated with Joint-Use Facilities. | X | |
| **Impact-NOI-13:** Exceed Caltrans Guideline Criteria for Potential Building Damage During Project Construction. | | X |
| **Impact-NOI-14:** Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Offsite Sensitive Receptors During Project Construction. | X | |
| **Impact-NOI-15:** Exceed Caltrans Guideline Criteria for Potential Human Annoyance at Occupied Onsite Learning Spaces During Project Construction. | X | |
| **Section 4.11, Paleontological Resources** | | |
| **Impact-PAL-1:** Potential to Disturb Buried Paleontological Resources from New Acquisition and New School or Administrative Facilities Projects. | | X |
| **Impact-PAL-2:** Potential to Disturb Buried Paleontological Resources During Construction of Whole Site Modernization and Joint-Use Facilities Development Projects. | | X |
| **Impact-PAL-3:** Potential to Disturb Fossil Collection Localities During Construction. | | X |
| **Impact-PAL-4:** Potential to Disturb Buried Paleontological Resources During Construction of Near-Term, Site-Specific Whole Site Modernization Projects. | | X |
| **Impact-PAL-5:** Potential to Disturb Fossil Collection Localities During Construction of Near-Term, Site Specific Whole Site Modernization Projects. | | X |
| **Section 4.12, Recreation** | | |
| N/A | N/A | N/A |
| **Section 4.13, Transportation** | | |
| **Impact-TRA-1:** Conflict with Policies Related to Safe and Effective Pedestrian and Bicycle Routes to School and Result in Potential Safety Hazards During Operation of a New School. | | X |
| **Impact-TRA-2:** Conflict with Policies Related to Safe and Effective Pedestrian and Bicycle Routes to School and Result in Potential Safety Hazards During Operation of a Whole Site Modernization Project. | | X |
| **Impact-TRA-3:** Potential to Generate Increased Vehicle Miles Traveled Within the Program Area Due to Increased Student Capacity or New Staff. | X | |
| **Section 4.14, Tribal Cultural Resources** | | |
| **Impact-TRI-1**: Disturbance and/or Destruction of Previously Identified Tribal Cultural Resources | | X |
| **Impact-TRI-2**: Disturbance and/or Destruction of Undiscovered Tribal Cultural Resources | | X |

| Resource Impact | Significant and Unavoidable | Less than Significant with Mitigation |
|---|---|---|
| **Impact-TRI-3:** Disturbance and/or Destruction of Previously Identified Tribal Cultural Resources | | X |
| **Section 4.15, Utilities and Service Systems** | | |
| **N/A** | N/A | N/A |
| **Section 4.16 Wildfire** | | |
| **Impact-WF-1:** Potential to Exacerbate the Risk of Wildfire During Construction of New Acquisition and New School or Administrative Facilities Projects. | X | |
| **Impact-WF-2:** Potential to Exacerbate the Risk of Wildfire During Operation. | X | |
| **Impact-WF-3:** Potential to Exacerbate the Risk of Wildfire and Expose Project Occupants to Pollutants or Uncontrolled Spread of Wildfire During Construction. | X | |
| **Impact-WF-4:** Potential to Expose Project Occupants to Pollutants or Uncontrolled Spread of Wildfire During Operation. | X | |
| **Impact-WF-5:** Exacerbate Wildfire Risk from the Installation of New Infrastructure During Construction of New Acquisition and New School or Administrative Facilities Projects. | X | |
| **Impact-WF-6:** Exacerbate Wildfire Risk from the Maintenance of Infrastructure or Fire Breaks. | X | |
| **Impact-WF-7:** Exacerbate Wildfire Risk from the Installation of New Infrastructure During Construction of Whole Site Modernization Projects. | X | |
| **Impact-WF-8:** Exacerbate Wildfire Risk from the Installation of New Infrastructure. | | X |
| **Impact-WF-9:** Expose People or Structures to Significant Risks from Post-Fire Hazards During Construction. | X | |
| **Impact-WF-10:** Expose People or Structures to Significant Risks from Post-Fire Hazards During Operation. | X | |

# 7.2 Selection of Alternatives

## 7.2.1 Alternatives Considered but Rejected

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this PEIR.

### 7.2.1.1 No Growth Alternative

A "no growth" alternative would involve the District maintaining the existing capacity within their existing facilities, and, as such, no expansion of existing or construction of new facilities would be required. However, per the California Department of Education (CDE), the District is legally obligated to accommodate increases in student populations generated by population growth within

the Program area (CDE 2020). Therefore, a no growth alternative was rejected from further consideration.

#### 7.2.1.2 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the PEIR. The Proposed Program is intended to provide improvements, repairs, and maintenance to existing District schools and administrative facilities as well as allow for the construction of new school or administrative facilities to benefit current and future students in the District. Therefore, the Proposed Program could not be implemented outside of the District's boundaries, and no alternative development area can feasibly be considered.

### 7.2.2 Alternatives Carried Forward

#### 7.2.2.1 Alternative 1: No Project Alternative

Per State CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative analyzed in this PEIR would involve the implementation of Vision 2020, the Long-Range Facilities Master Plan, and improvements for school facilities that were identified under Propositions S and Z, and Measure YY. Propositions S and Z identify specific projects that are authorized to be completed at each individual school site. Propositions S and Z, and Measure YY authorizes projects to be completed at each or any of the District's school sites, including child development centers and other District facilities as detailed in Section 3.2.2.3 of Chapter 3, *Project Description*. Under this alternative, improvements detailed in Table 3-1 of Chapter 3 for the New Acquisition and New School or Administrative Facilities, Whole Site Modernization, Upgrades of Existing School and Administrative Sites, and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories would occur. However, the Capital Improvement Program and the *SDUSD CEQA Guidelines and Comprehensive Mitigation Plan for District Facilities* would not be established or implemented as part of Alternative 1. This means the improvements to schools and administrative facilities, and joint-use facilities development would occur consistent with the District's current practice of conducting separate CEQA analyses of every proposed capital improvement project at each school. The District would not develop a set of CEQA guidelines and screening criteria for the project categories that fall under the capital improvement program that would streamline the District's CEQA process under this alternative.

#### 7.2.2.2 Alternative 2: No New Site Acquisition and New School or Administrative Facilities Alternative

Under Alternative 2, the District would not acquire any new sites and would not construct any new school or administrative facilities. Any new growth in student population within the Program area would need to be accommodated at existing District facilities. All other improvements related to the Proposed Program as defined in Chapter 3 would occur. Substantial renovation of existing District sites could still occur under the Whole Site Modernization project category as well as the construction of joint-use facilities at existing District properties. In addition, activities associated

with the Upgrades of Existing School and Administrative Sites project category would occur, including modernization of buildings, maintenance and replacement of aging infrastructure, technology upgrades, addition or upgrades of heating, ventilation, and air conditioning (HVAC) systems, etc.

### 7.2.2.3 Alternative 3: Only Whole Site Modernization and Upgrades of Existing School and Administrative Sites Alternative

Under Alternative 3, the Proposed Program would only include the Upgrades of Existing School and Administrative Sites and portions of the Whole Site Modernization project categories. Because this alternative would not include the acquisition of new sites and construction of new schools, any new growth in student population within the Program area would need to be accommodated at existing District facilities Under this alternative, the whole site modernization projects would only include renovations or upgrades of existing buildings and would not involve major grading or ground disturbance. No new permanent classrooms would be constructed, and, therefore, modular, relocatable, or portable classrooms would remain at District sites and would continue to be used for additional classroom space. HVAC system upgrades would occur and reconfigurations of existing athletic facilities or of existing driveways, drop-off zones, bus loading areas, and parking lots could also occur. The New Site Acquisition and New School or Administrative Facilities and Joint-Use Facilities Development Including Fields, Pools, and Play All Day Program project categories would not be implemented.

Whole site modernization projects would include all of the components described in Chapter 3, including:

- Reconstruction of existing library/media centers, performing arts buildings, theaters, and auditoriums.
- Improvements to athletic facilities, such as new public address (PA) systems, electronic scoreboards, locker room improvements, installation of artificial turf fields to replace existing athletic facilities or the reconfiguration of existing athletic facilities, as well as the development of field use policies for school and third-party use of both existing and improved athletic facilities.
- Demolition of modular classrooms and staging of modular classrooms for other District sites.
- Reconfiguration of existing restrooms.

Upgrades of existing school and administrative sites would include all of the components described in Chapter 3, including:

- Construction of new, or reconfiguration of existing, driveways, drop-off zones, bus loading areas, and parking lots for improved safety and circulation of vehicles and pedestrians.
- Construction of new, or reconfiguration of existing, Americans with Disabilities Act (ADA) pathway, ramp, and elevator improvements.
- Construction of new, or reconfiguration of existing, hardscape and landscape areas.
- Modernization and renovation of school facilities to comply with Title IX gender equity requirements.
- Improvements to visual and performing arts, physical education, athletic, and science education facilities.

- Replacement of fire alarms, emergency communication systems, security fencing, and various site security improvements.
- Technology upgrades, such as wired and wireless infrastructure and equipment upgrades.
- Improvements to the seismic structural integrity of school buildings.
- HVAC system upgrades or additions.
- Installation of solar panels and other energy efficiency upgrades.
- Utility upgrades, such as electrical, water, sewer, and storm drains.
- Other interior finishes such as the provision of new classroom furniture, interior and exterior painting and repairs, and the reconfiguration of existing classroom spaces.
- Wall, pole, or ground mounted marquee sign or other wayfinding monuments.

# 7.3 Analysis of Alternatives

## 7.3.1 Analysis of Alternative 1: No Project Alternative

### 7.3.1.1 Aesthetics

Under the No Project Alternative, all improvements associated with the Proposed Program could be implemented at any of the District's school or administrative sites, including whole site modernization projects, upgrades of existing school and administrative sites, and joint-use facilities. In addition, the No Project Alternative would allow for the acquisition of new sites and construction of new school or administrative facilities. As such, the No Project Alternative would result in the same construction and operational impacts on aesthetics as the Proposed Program. Potential construction-related impacts include adverse effects on views within a vista area, damage to scenic resources within an eligible or officially designated state scenic highway, and degradation of visual character and quality. Potential operational impacts include adverse effects on views within a vista area and a substantial increase of nighttime lighting. Impacts under the No Project Alternative would be similar to the Proposed Program.

### 7.3.1.2 Air Quality and Health Risk

The No Project Alternative would result in the same construction and operational activities as the Proposed Program. This would include construction of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of existing school and administrative sites, and new joint-use facilities. Similar to the Proposed Program, these types of projects would generate emissions during construction and operation. As such, the No Project Alternative would result in the same air quality impacts as the Proposed Program, including the potential to result in a cumulative net increase in criteria pollutants during construction and operation, expose sensitive receptors to substantial criteria pollutant concentrations, expose sensitive receptors to substantial toxic air contaminant (TAC) emissions during construction, and result in other emissions (such as those leading to odors) adversely affecting a substantial number of people during operation. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

### 7.3.1.3 Biological Resources

The No Project Alternative would result in the same construction and operational activities as the Proposed Program. This would include construction and operation of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of school and administrative sites, and new joint-use facilities. Similar to the Proposed Program, these activities could result in the removal of vegetation and could be located adjacent to sensitive habitat and species. As such, the No Project Alternative would result in the same impacts on biological resources as the Proposed Program, including the potential to have a direct substantial adverse effect on any sensitive species during construction, have an indirect substantial adverse effect on Multi-Habitat Planning Area lands and native vegetation during construction and operation, have an adverse effect on any riparian or other sensitive vegetation community during construction, have an adverse effect on State or Federally protected wetlands during construction, interfere substantially with wildlife movement or corridors or impede the use of native wildlife nursery sites during construction, and conflict with local policies or ordinances protecting biological resources during construction. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

### 7.3.1.4 Cultural Resources

The No Project Alternative would include the construction of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of existing school and administrative sites, and new joint-use facilities similar to the Proposed Program. Similar to the Proposed Program, these types of projects would involve demolition and alteration of historic structures, as well as ground-disturbing activities. As such, construction activities under the No Project Alternative would result in the same impacts on cultural resources as the Proposed Program, which include the potential to cause a substantial adverse change in the significance of a historical resource through demolition, construction, and physical alteration, and disturbance and/or destruction of previously recorded and/or undiscovered archaeological resources. Similar to the Proposed Program, the No Project Alternative would not result in any significant operational impacts on cultural resources. Impacts under the No Project Alternative would be similar to the Proposed Program.

### 7.3.1.5 Energy

The No Project Alternative would include the same improvements as the Proposed Program, including construction of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of existing school and administrative sites, and new joint-use facilities. Similar to the Proposed Program, construction and operation of these facilities would require energy consumption. As such, construction activities under the No Project Alternative would result in the same energy impacts as the Proposed Program, which include the potential wasteful, inefficient, or unnecessary consumption of energy resources during construction and operation and inconsistency with District environmental sustainability goals. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

### 7.3.1.6 Geology and Soils

The No Project Alternative would result in the same construction and operational activities as the Proposed Program. This would include construction and operation of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of existing school

and administrative sites, and new joint-use facilities. Similar to the Proposed Program, these types of projects would involve ground-disturbing activities on undeveloped land or extensive grading and excavation. As such, the No Project Alternative would result in the same geology and soils impacts as the Proposed Program, including the potential to result in substantial soil erosion or the loss of topsoil during construction. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

#### 7.3.1.7 Greenhouse Gas Emissions

The No Project Alternative would result in the same construction and operational activities as the Proposed Program. This would include construction and operation of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of existing school and administrative sites, and new joint-use facilities. Similar to the Proposed Program, these types of projects would generate greenhouse gas (GHG) emissions during construction and operation. As such, the No Project Alternative would result in the same GHG impacts as the Proposed Program, including the generation of GHG emissions, either directly or indirectly, that may have a significant impact on the environment during construction and operation, and the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

#### 7.3.1.8 Hazards and Hazardous Materials

The No Project Alternative would result in the same construction and operational activities as the Proposed Program. This would include construction and operation of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of existing school and administrative sites, and new joint-use facilities. Similar to the Proposed Program, these types of projects would involve ground-disturbing activities that would have the potential to encounter hazardous materials. As such, the No Project Alternative would result in the same hazards and hazardous materials impacts as the Proposed Program, including the potential to encounter hazardous materials during ground-disturbing activities and construction, encounter contamination or munitions on sites listed as Formerly Used Defense Sites (FUDS), encounter lead or organochlorine pesticides in soil during construction, interfere with Federal Aviation Administration (FAA) communication, conflict with regulations applicable to Review Area 1, and conflict with regulations applicable to Review Area 2. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

#### 7.3.1.9 Hydrology and Water Quality

The No Project Alternative would include the same project categories and result in the same construction and operational activities as the Proposed Program. This would include construction of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of existing school and administrative sites, and new joint-use facilities. Similar to the Proposed Program, construction activities associated with No Project Alternative could include demolition, grading and excavation, filling and compaction, and construction of aboveground facilities and buildings, which could degrade water quality by increasing polluted stormwater runoff. Additionally, erosion and sediment transport from future project sites and on- and offsite staging areas could occur. The operation of new or expanded facilities under the No Project Alternative could also increase the impervious surfaces in the Program area, which could generate pollutants that impair water quality. As such, the No Project Alternative would result in the same

hydrology and water quality impacts as the Proposed Program, including the potential to violate water quality standards or waste discharge requirements during construction and operation, result in substantial erosion or siltation on or off site during construction and operation, result in substantial flooding on or off site or impede or redirect flood flows during construction and operation, 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 during construction and operation. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

### 7.3.1.10 Noise and Vibration

The No Project Alternative would include the same improvements as the Proposed Program, including construction of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of existing school and administrative sites, and new joint-use facilities. Similar to the Proposed Program, construction and operation of these facilities would generate noise and vibration. As such, the No Project Alternative would result in the same noise and vibration impacts as the Proposed Program, including the potential to exceed the City of San Diego Municipal Code construction noise limits during construction, exceed 75 A-weighted decibel (dBA) 12-hour equivalent continuous sound level ($L_{eq}$) at occupied onsite learning spaces due to construction activities, increase traffic noise by 3 decibel (dB) Community Noise Equivalent Level (CNEL) or more that would result in excessive noise levels due to additional vehicle trips, generate a noticeable increase (3 dB or more) in noise levels at a noise-sensitive offsite land use during operation, and exceed California Department of Transportation (Caltrans) Guideline Criteria for potential building damage and human annoyance at offsite sensitive receptors and occupied onsite learning spaces during project construction. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

### 7.3.1.11 Paleontological Resources

The No Project Alternative would include the same project categories and result in the same construction and operational activities as the Proposed Program. This would include construction of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of existing school and administrative sites, and new joint-use facilities. Similar to the Proposed Program, these types of projects would involve ground-disturbing activities that would have the potential to encounter paleontological resources. As such, the No Project Alternative would result in the same paleontological resources impacts as the Proposed Program, including the potential to disturb buried paleontological resources and fossil collection localities during construction. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

### 7.3.1.12 Recreation

The No Project Alternative would include the same recreational facilities as the Proposed Program. This would include construction of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of existing school and administrative sites, and new joint-use facilities. Similar to the Proposed Program, the No Project Alternative could include the construction of new schools (including charter schools) that would include new recreational facilities to accommodate the student population. Recreational facilities could include new athletic stadiums and outdoor play areas, such as hard-court areas, playfields, and other physical education

facilities. Whole site modernization projects at existing schools could include improved athletic facilities or the reconfiguration of existing athletic facilities. Joint-use facility projects could include both upgrades to existing playgrounds, fields, and physical education facilities or construction of new facilities intended for future joint use. These improvements could be constructed at any of the District's schools and could involve excavation and ground-disturbing activities for the installation of athletic fields, replacement field lighting, and other athletic facilities. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

### 7.3.1.13 Transportation

The No Project Alternative would include the same project categories and result in the same construction and operational activities as the Proposed Program. This would include construction of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of existing school and administrative sites, and new joint-use facilities. Similar to the Proposed Program, these activities would generate vehicle trips and vehicle miles traveled (VMT) during construction and operation. In addition, the No Project Alternative would also potentially include new pick-up/drop-off zones or new driveways that would redistribute traffic patterns. As such, the No Project Alternative would result in the same transportation impacts as the Proposed Program, including conflicts with policies related to safe and effective pedestrian and bicycle routes to school, potential to result in safety hazards during operation of a new school, and potential to generate increased VMT within the Program area due to increased student capacity or new staff. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

### 7.3.1.14 Tribal Cultural Resources

The No Project Alternative would include the same project categories and result in the same construction and operational activities as the Proposed Program. This would include construction of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of existing school and administrative sites, and new joint-use facilities. Similar to the Proposed Program, these types of projects would involve ground-disturbing activities that would have the potential to encounter tribal cultural resources. As such, the No Project Alternative would result in the same tribal cultural resources impacts as the Proposed Program, including disturbance and/or destruction of previously identified tribal cultural resources and undiscovered tribal cultural resources during construction. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

### 7.3.1.15 Utilities and Service Systems

The No Project Alternative would include the same project categories and result in the same construction and operational activities as the Proposed Program. This would include construction of new school or administrative facilities, modernization of existing school and administrative facilities, upgrades of existing school and administrative sites, and new joint-use facilities. Similar to the Proposed Program, the construction of a new school or administrative facility under the No Project Alternative would require the installation of new utilities to serve the facility, including offsite improvements to provide connections to any new utilities, which would involve ground-disturbing activities. Additionally, construction activities could require the relocation of existing water, wastewater treatment, energy, stormwater drainage, and/or telecommunications facilities to

accommodate future improvements under this alternative. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

#### 7.3.1.16 Wildfire

Under the No Project Alternative, all improvements associated with the Proposed Program could be implemented at any of the District's school or administrative sites, including whole site modernization projects, upgrades of existing school and administrative sites, and joint-use facilities development. In addition, the No Project Alternative would allow for the acquisition of new sites and construction of new school or administrative facilities. Similar to the Proposed Program, these activities could occur in Very High Fire Hazard Severity Zones (FHSZ). As such, the No Project Alternative would result in the same wildfire impacts as the Proposed Program, including the potential to exacerbate the risk of wildfire during construction and operation, expose project occupants to pollutants or uncontrolled spread of wildfire during construction and operation, exacerbate wildfire risk from the installation of new infrastructure, exacerbate wildfire risk from the maintenance of infrastructure or fire breaks, and expose people or structures to significant risks from post-fire hazards during construction and operation. Therefore, impacts under the No Project Alternative would be similar to the Proposed Program.

#### 7.3.1.17 Relationship to Program Objectives

Under the No Project Alternative, all improvements associated with the Proposed Program could be implemented at any of the District's school or administrative sites, including whole site modernization projects, upgrades of existing school and administrative sites, and joint-use facilities development. In addition, the No Project Alternative would allow for the acquisition of new sites and construction of new school or administrative facilities. However, under the No Project Alternative the District would not establish a CEQA program and CEQA guidelines and would not develop a programmatic EIR from which to tier from for future proposed projects. Therefore, the No Project Alternative would not meet Project Objective 4, which is to develop a District-specific CEQA guidelines and criteria, a list of specific ministerial projects, and standard construction and operating procedures to allow for a consistent streamlined process for environmental review of future projects. Under Alternative 1, each of the improvements would be constructed, but would be analyzed under separate environmental review processes, and there would not be a streamlined program for environmental review. The No Project Alternative would meet all other project objectives.

### 7.3.2 Analysis of Alternative 2: No New Site Acquisition and New School or Administrative Facilities Alternative

#### 7.3.2.1 Aesthetics

Under Alternative 2, no new site acquisition would occur, and no new school or administrative facilities would be constructed. As such, this alternative would not result in any impacts on scenic vistas, or on scenic resources along an eligible or officially designated state scenic highway, degradation of visual character and quality, or a substantial increase of nighttime lighting from the construction and operation of new school or administrative facilities. However, this alternative would include all other project categories under the Proposed Program, including whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities

development. As a result, all other aesthetics impacts associated with the Proposed Program would still occur under Alternative 2. Accordingly, impacts on aesthetics under this alternative would be slightly reduced compared to the Proposed Program.

#### 7.3.2.2 Air Quality and Health Risk

Alternative 2 would not include the development of any new school or administrative facilities that would generate emissions during construction and operation. However, all other project categories associated with the Proposed Program would still occur under this alternative, including whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities development. As such, these project categories would still generate emissions from construction and operation of newly modernized school and administrative facilities as well as new joint-use facilities. In addition, because new schools would not be constructed to accommodate any increases in student population under this alternative, it is possible that new students would have to travel farther to attend school at existing facilities as opposed to attending school at new facilities closer to their homes, which would result in an increase in operational emissions. Overall, therefore, emissions under Alternative 2 would be similar compared to the Proposed Program. Accordingly, impacts on air quality under this alternative would be similar compared to the Proposed Program.

#### 7.3.2.3 Biological Resources

Alternative 2 would not include the development of any new school or administrative facilities that could be located on undeveloped sites or adjacent to areas with sensitive habitat and species. As a result, this alternative would not result in substantial clearing and grubbing, grading and excavation, filling and compaction, and other substantial ground-disturbing activities that could adversely affect candidate, sensitive, or special-status plant and wildlife species. However, all other project categories would still be implemented under this alternative, and, thus, all other biological resources impacts associated with the Proposed Program would occur under Alternative 2. Accordingly, impacts on biological resources under this alternative would be slightly reduced compared to the Proposed Program.

#### 7.3.2.4 Cultural Resources

Alternative 2 would not result in substantial grading or excavation to accommodate new school or administrative facilities. As such, any cultural resources impacts associated with new school or administrative facilities would be eliminated under this alternative. However, Alternative 2 could still result in the demolition or alteration of historic structures as well as ground-disturbing activities that could impact archaeological resources from construction of whole site modernization projects, upgrades of existing school and administrative sites, and joint-use facilities development. Therefore, impacts on cultural resources would be slightly reduced under this alternative.

#### 7.3.2.5 Energy

Alternative 2 would not include the development of any new school or administrative facilities that would result in energy consumption during construction and operation. However, all other project categories associated with the Proposed Program would still occur under this alternative, including modernization of existing school and administrative facilities, upgrades of existing school and administrative sites, and joint-use facilities development. Construction and operation of these facilities would require energy consumption. While any increases in student population and capacity

that could occur at existing facilities would increase energy use within the existing facilities, this increase in energy would still be less than what would occur to operate an entirely new facility. Overall, energy impacts would be slightly reduced under this alternative.

### 7.3.2.6 Geology and Soils

Under Alternative 2, no new school or administrative facilities would be constructed that would require substantial grading or excavation. As such, any geology and soils impacts associated with new school or administrative facilities would be eliminated under this alternative. However, Alternative 2 would still include the construction and operation of whole site modernization projects, upgrades of existing school and administrative sites, and joint-use facilities development. These project categories would involve ground-disturbing activities that could result in soil erosion and loss of topsoil during construction. Overall, geology and soils impacts would be slightly reduced under this alternative.

### 7.3.2.7 Greenhouse Gas Emissions

Alternative 2 would not include the development of any new school or administrative facilities that would generate GHG emissions during construction and operation. However, all other project categories associated with the Proposed Program would still occur under this alternative, including whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities development. As such, these project categories would still generate GHG emissions from construction and operation of newly modernized school and administrative facilities as well as new joint-use facilities. Because any increases in student population would be accommodated at existing facilities under this alternative, instead of a new school, there would be an increase in GHG emissions due to the potential for new students to have to travel farther to attend existing schools, and there would be increased utility use and waste generated at the existing facilities. However, the GHG emissions associated with larger student populations within existing facilities would still be less than the operation of an entirely new school campus. Overall, GHG emissions under Alternative 2 would be reduced compared to the Proposed Program. Accordingly, impacts on GHG emissions impacts under this alternative would be slightly reduced compared to the Proposed Program.

### 7.3.2.8 Hazards and Hazardous Materials

Under Alternative 2, no new school or administrative facilities would be constructed that would require substantial grading or excavation. As such, any hazards and hazardous materials impacts associated with new school or administrative facilities would be eliminated under this alternative. However, Alternative 2 would still include the construction and operation of whole site modernization projects, upgrades of existing school and administrative sites, and joint-use facilities development. These project categories would involve ground-disturbing activities that could encounter contaminated media, lead- or pesticide-contaminated soil, and FUDS-related hazards during construction. In addition, these project categories would potentially interfere with FAA communications and conflict with Airport Land Use Compatibility Plan (ALUCP) regulations during construction. Overall, hazards and hazardous materials impacts would be slightly reduced under this alternative.

### 7.3.2.9 Hydrology and Water Quality

Alternative 2 would not include the development of any new school or administrative facilities that could create new sources of polluted runoff from new impervious surfaces. However, whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities development could occur under this alternative, and could involve demolition, grading and excavation, filling and compaction, and construction of aboveground facilities and buildings that could degrade water quality by increasing polluted stormwater runoff during construction. In addition, these project categories could result in an expansion of impervious surfaces that could increase polluted runoff. Overall, hydrology and water quality impacts would be slightly reduced under this alternative.

### 7.3.2.10 Noise and Vibration

Alternative 2 would not include the development of any new school or administrative facilities that could generate noise and vibrations as a result of construction or operational activities. However, whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities development could occur under this alternative, and could involve demolition, grading, and excavation, and construction activities that could generate noise or vibration over the thresholds for construction noise levels, as well as operational activities that could result in a noticeable increase in noise levels. Overall, noise- and vibration-related impacts would be slightly reduced under this alternative.

### 7.3.2.11 Paleontological Resources

Alternative 2 would not result in substantial grading or excavation to accommodate new school or administrative facilities. As such, any impacts on paleontological resources associated with new school or administrative facilities would be eliminated under this alternative. However, Alternative 2 could still result ground-disturbing activities that could impact paleontological resources from construction of whole site modernization projects, upgrades of existing school and administrative sites, and joint-use facilities development. Overall, impacts on paleontological resources would be slightly reduced under this alternative.

### 7.3.2.12 Recreation

Alternative 2 would not result in the construction of new schools which could include new recreational facilities to accommodate the student population. However, whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities development would occur under Alternative 2, and could result in impacts on recreational facilities. Whole site modernization projects could include improved athletic facilities or the reconfiguration of existing athletic facilities. Joint-use facility projects could include both upgrades to existing playgrounds, fields, and physical education facilities or construction of new facilities intended for future joint use. However, the elimination of new school sites would reduce the opportunity for new joint-use facilities, and existing facilities would have to accommodate any increases in population, which would result in more strain on existing recreational facilities. Therefore, impacts on recreational facilities would be slightly increased under this alternative.

### 7.3.2.13 Transportation

Under Alternative 2, no new site acquisition would occur and no new school or administrative facilities would be constructed. Although whole site modernization, upgrades of existing school and administrative sites, and joint-use facilities development could occur under Alternative 2, this alternative would eliminate the potential significant VMT impact associated with new school or administrative facilities. However, increased student population would have to be accommodated at existing facilities, and new students may have to travel farther to attend school at existing facilities than they would at a new school built closer to their homes, which could result in similar or even increased VMT compared to VMT generated under the Proposed Program. In addition, this alternative would still have the potential to conflict with policies related to safe and effective pedestrian and bicycle routes to school. Overall, impacts on transportation would be slightly increased under this alternative.

### 7.3.2.14 Tribal Cultural Resources

Alternative 2 would not result in substantial grading or excavation to accommodate new school or administrative facilities. As such, any tribal cultural resources impacts associated with new school or administrative facilities would be eliminated under this alternative. However, Alternative 2 could still result ground-disturbing activities that could impact tribal cultural resources from construction of whole site modernization projects, upgrades of existing school and administrative sites, and joint-use facilities development. Overall, impacts on tribal cultural resources would be slightly reduced under this alternative.

### 7.3.2.15 Utilities and Service Systems

Under Alternative 2, the installation of utilities systems to serve new school or administrative facilities would not occur, and thus would not result in physical impacts. However, all other project impacts would occur under Alternative 2, and would potentially involve the replacement, relocation, upgrades to or extension of existing utilities to accommodate whole site modernization projects, upgrades of existing school and administrative sites, or joint-use facilities development. Construction activities related to existing utilities could involve ground disturbance and may result in physical impacts. Overall, impacts related to utilities would be slightly reduced under this alternative.

### 7.3.2.16 Wildfire

Under Alternative 2, the acquisition of new sites and construction of new school or administrative facilities in Very High FHSZ would not occur. However, whole site modernization projects and upgrades of existing school and administrative sites, such as landscaping and utilities, and joint-use facilities development could occur in FHSZ. As such, this alternative could result in wildfire impacts, including the potential to exacerbate the risk of wildfire during construction and operation, expose project occupants to pollutants or uncontrolled spread of wildfire during construction and operation, exacerbate wildfire risk from the installation of new infrastructure, exacerbate wildfire risk from the maintenance of infrastructure or fire breaks, and expose people or structures to significant risks from post-fire hazards during construction and operation. Overall, impacts related to wildfire would be slightly reduced under this alternative.

#### 7.3.2.17 Relationship to Program Objectives

Alternative 2 would not include the acquisition of new property, or the construction of new school or administrative facilities. As such, Alternative 2 would not meet one aspect of Project Objective 1. Project Objective 1 calls for the acquiring of property for neighborhood and charter schools to best serve the District's educational needs in accordance with the District's Long-Range Facilities Master Plan and State law, to provide diverse learning opportunities for District students, and to accommodate and contribute to other community needs. Because the Proposed Program under Alternative 2 would not include new acquisition, it would not meet this objective. Alternative 2 would meet all other project objectives.

### 7.3.3 Analysis of Alternative 3: Only Whole Site Modernization and Upgrades of Existing School and Administrative Sites

#### 7.3.3.1 Aesthetics

Under Alternative 3, no new site acquisition would occur and no new school, administrative facilities, or joint-use facilities would be constructed. As such, this alternative would not result in any impacts on scenic vistas, or scenic resources along an eligible or officially designated state scenic highway, degradation of visual character and quality, or a substantial increase of nighttime lighting from the construction and operation of new school or administrative facilities. However, this alternative would include the renovation or modernization of existing structures, and improvements or construction of new infrastructure at existing school or administrative properties, similar to the Proposed Program. In addition, because increased student populations would have to be accommodated by existing facilities under this alternative, renovations at existing campuses may need to include the addition of portable classrooms to existing campuses, which could result in impacts on visual resources. As a result, all other aesthetics impacts associated with the Proposed Program would still occur under Alternative 2. Accordingly, impacts on aesthetics under this alternative would be slightly reduced compared to the Proposed Program.

#### 7.3.3.2 Air Quality

The Whole Site Modernization and Upgrades of Existing School and Administrative Sites project categories would still generate emissions from construction and operation of modernized or updated existing buildings and structures. However, this alternative would not include the construction or operation of new schools, administrative facilities, or joint use facilities, which would generate air emissions. In addition, because new schools would not be constructed to accommodate any increases in student population under this alternative, it is possible that new students would have to travel farther to attend school at existing facilities as opposed to attending school at new facilities closer to their homes, which would result in an increase in operational emissions. Overall, emissions under Alternative 3 would be similar compared to the Proposed Program. Accordingly, impacts on air quality under this alternative would be similar reduced compared to the Proposed Program.

#### 7.3.3.3 Biological Resources

Alternative 3 would not include the development of any new school or administrative facilities, or joint-use facilities that could be located on undeveloped sites or adjacent to areas with sensitive habitat and species. As a result, this alternative would not result in substantial clearing and grubbing, grading and excavation, filling and compaction, and other substantial ground-disturbing activities that could adversely affect candidate, sensitive, or special-status plant and wildlife species. However, whole site modernization projects and upgrades of existing school and administrative sites that result in minor to major ground disturbance, clearing and grubbing, and minor to major excavation, filling, and compaction would still be implemented under this alternative. As a result, all other biological resources impacts associated with the Proposed Program would still occur under Alternative 2. Accordingly, impacts on biological resources under this alternative would be slightly reduced compared to the Proposed Program.

#### 7.3.3.4 Cultural Resources

Alternative 3 would not result in substantial grading or excavation to accommodate new school or administrative facilities, or joint-use facilities. As such, any cultural resources impacts associated with new schools, new administrative facilities, or joint-use facilities would be eliminated under this alternative. However, Alternative 3 could still result in the demolition or alteration of historic structures as well as ground-disturbing activities that could impact archaeological resources from construction of whole site modernization projects, and upgrades of existing school and administrative sites. Therefore, impacts on cultural resources would be slightly reduced under this alternative.

#### 7.3.3.5 Energy

Alternative 3 would not include the development of any new school or administrative facilities that would result in energy consumption during construction and operation. However, the Whole Site Modernization and Upgrades of Existing School and Administrative Sites project categories associated with the Proposed Program would still occur under this alternative. These categories include, but are not limited to, renovations of existing school and administrative facilities buildings, technology upgrades, HVAC additions, installation of solar panels and other energy efficiency upgrades, and utility upgrades, which could result in reduction of energy consumption. However, construction and operation of these facilities would still require energy consumption. While any increases in student population and capacity that could occur at existing facilities would increase energy use within the existing facilities, this increase in energy would still be less than what would occur to operate an entirely new facility. Overall, energy impacts would be slightly reduced under this alternative.

#### 7.3.3.6 Geology and Soils

Under Alternative 3, no new school or administrative facilities would be constructed that would require substantial grading or excavation. As such, any geology and soils impacts associated with new school or administrative facilities would be eliminated under this alternative. However, Alternative 3 would still include the construction and operation of whole site modernization projects, and upgrades of existing school and administrative sites. These project categories would involve ground-disturbing activities that could result in soil erosion and loss of topsoil during construction. Overall, geology and soils impacts would be slightly reduced under this alternative.

### 7.3.3.7 Greenhouse Gas Emissions

The two project categories that would be implemented under Alternative 3, Whole Site Modernization and Upgrades of Existing School and Administrative Sites, would still generate GHG emissions from construction and operation of newly modernized school and administrative facilities, and construction of facility and infrastructure upgrades, including HVAC systems and technology upgrades. Because any increases in student population would be accommodated at existing facilities under this alternative, instead of a new school, there would be an increase in GHG emissions due to the potential for new students to have to travel farther to attend existing schools, and there would be increased utility use and waste generated at the existing facilities. However, the GHG emissions associated with larger student populations within existing facilities would still be less than the operation of an entirely new school campus. Overall, GHG emissions under Alternative 3 would be reduced compared to the Proposed Program. Accordingly, impacts on GHG emissions impacts under this alternative would be slightly reduced compared to the Proposed Program.

### 7.3.3.8 Hazards and Hazardous Materials

Hazards and hazardous materials impacts associated with new school or administrative facilities would be eliminated under this alternative. However, Alternative 3 would still include the construction and operation of whole site modernization projects and upgrades of existing school and administrative sites, which would involve ground-disturbing activities that could encounter contaminated media, lead- or pesticide-contaminated soil, and FUDS-related hazards during construction. In addition, these project categories would potentially interfere with FAA communications and conflict with ALUCP regulations during construction. Overall, hazards and hazardous materials impacts would be slightly reduced under this alternative.

### 7.3.3.9 Hydrology and Water Quality

Alternative 3 would not result in new sources of polluted runoff from new impervious surfaces created by the construction of new school or administrative facilities. However, whole site modernization projects and upgrades of existing school and administrative sites could occur under this alternative, which could involve demolition, grading and excavation, filling and compaction, and construction of aboveground facilities and buildings that could degrade water quality by increasing polluted stormwater runoff during construction. In addition, these project categories could result in an expansion of impervious surfaces that could increase polluted runoff. Overall, hydrology and water quality impacts would be slightly reduced under this alternative.

### 7.3.3.10 Noise and Vibration

Alternative 3 would not result in noise and vibration impacts from the construction and operation of new schools, new administrative facilities, and joint use facilities. However, Alternative 3 would still generate noise and vibration from the construction and operation of whole site modernization projects, and upgrade projects of existing schools and administrative sites, including landscaping, circulation, HVAC, and other upgrades. Alternative 3 could result in impacts related to increasing noise levels during construction, increasing traffic noise, and generating a noticeable increase in noise levels during operation. Overall, impacts related to noise and vibration would be slightly reduced under this alternative.

### 7.3.3.11 Paleontological Resources

Any impacts on paleontological resources associated with new school or administrative facilities and joint-use facilities would be eliminated under this alternative. However, Alternative 3 could still result in ground-disturbing activities that could impact paleontological resources related to construction of whole site modernization projects and upgrades of existing school and administrative sites. Overall, impacts on paleontological resources would be slightly reduced under this alternative.

### 7.3.3.12 Recreation

Alternative 3 could include installation of artificial turf fields to replace existing athletic facilities or the reconfiguration of existing athletic facilities, as well as the development of field use policies for school and third-party use of both existing and improved athletic facilities, as part of the whole site modernization project category. These improvements could be constructed at any of the District's existing schools and could involve excavation and ground-disturbing activities for the installation of athletic fields, replacement field lighting, and other athletic facilities. However, these activities would not occur at any new school sites or new administrative facilities, as these categories would not be included in Alternative 3. Furthermore, this alternative would not include the development of joint-use facilities, and the elimination of new school sites would reduce the opportunity for new joint-use facilities. Therefore, existing joint-use facilities would have to accommodate any increases in population, which would result in more strain on existing recreational facilities. Therefore, impacts related to recreation and recreational facilities would be slightly increased under this alternative.

### 7.3.3.13 Transportation

Under Alternative 3, no new site acquisition would occur and no new school or administrative facilities would be constructed; therefore, this alternative would eliminate the significant VMT impact associated with new school or administrative facilities. However, increased student population would have to be accommodated at existing facilities, and new students may have to travel farther to attend school at existing facilities than they would at a new school built closer to their homes, which could result in similar or even increased VMT compared to VMT generated under the Proposed Program. In addition, this alternative would still have the potential to conflict with policies related to safe and effective pedestrian and bicycle routes to school related to whole site modernization projects and upgrades of existing school and administrative sites. Overall, impacts on transportation would be slightly increased under this alternative.

### 7.3.3.14 Tribal Cultural Resources

Alternative 3 would not result in substantial grading or excavation to accommodate new school or administrative facilities and joint-use facilities. As such, any tribal cultural resources impacts associated with new school or administrative facilities would be eliminated under this alternative. However, Alternative 3 could still result ground-disturbing activities that could impact tribal cultural resources from construction of whole site modernization projects and upgrades of existing school and administrative sites, which could include grading, excavation, and fill. Overall, impacts on tribal cultural resources would be slightly reduced under this alternative.

### 7.3.3.15 Utilities and Service Systems

Alternative 3 would not include the installation of new utilities, including offsite improvements to provide connections to any new utilities, which would involve ground-disturbing activities, related to construction of new school or administrative facilities. However, whole site modernization projects and upgrades of existing schools and administrative sites could include construction activities that would require the relocation of existing water, wastewater treatment, energy, stormwater drainage, and/or telecommunications facilities to accommodate future improvements under this alternative. Overall, impacts related to utilities and service systems would be slightly reduced under this alternative.

### 7.3.3.16 Wildfire

Under Alternative 3, the acquisition of new sites and construction of new school or administrative facilities in Very High FHSZ would not occur. However, whole site modernization projects and upgrades of existing schools and administrative sites, such as landscaping and utilities, could occur in FHSZ. As such, this alternative could result in wildfire impacts, including the potential to exacerbate the risk of wildfire during construction and operation, expose project occupants to pollutants or uncontrolled spread of wildfire during construction and operation, exacerbate wildfire risk from the installation of new infrastructure, exacerbate wildfire risk from the maintenance of infrastructure or fire breaks, and expose people or structures to significant risks from post-fire hazards during construction and operation. Overall, impacts related to wildfire would be slightly reduced under this alternative.

### 7.3.3.17 Relationship to Program Objectives

Alternative 3 would not include new acquisition, construction of new school or administrative facilities, or implementation of joint-use facilities. Alternative 3 would not meet one of the aspects of Project Objective 1, because it would not include allow for acquiring property for neighborhood and charter schools to meet the Board of Education Vision 2020 plan to develop a quality school in every neighborhood. In addition, Alternative 3 would not meet Project Objective 3, which is to, "facilitate agreements with any public agency, public institution, and/or community organization for use of community facilities for school programs or to make school facilities or grounds available for use by those entities and allow for community and school use of District athletic fields and lighted stadiums in a way that maximizes benefits to the school and its students while minimizing negative impacts on the surrounding community." Alternative 3 would not include either upgrades to existing playgrounds, fields, and physical education facilities or construction of new facilities intended for future joint use. Alternative 3 would meet the other three project objectives.

## 7.3.4 Environmentally Superior Alternative

Pursuant to CEQA, the PEIR is required to identify the environmentally superior alternative. Because the No Project Alternative would still include all project categories of the Proposed Program, the No Project Alternative would result in the same level of impacts as the Proposed Program. Alternative 2 and Alternative 3 would both result in slightly reduced impacts compared to the Proposed Program for all environmental issue areas, because both alternatives would reduce construction projects and associated operation of facilities. As indicated in Table 7-2, Alternative 2 and Alternative 3 would both be the environmentally superior alternatives. However, because Alternative 3 would not include joint-use facilities development, it would result in slightly less development than Alternative

2; and therefore, may result in slightly reduced impacts compared to Alternative 2, although it would not result in significantly reduced impacts compared to the Proposed Program. Therefore, although it is not represented in the numerical comparison of the alternatives in Table 7-2, Alternative 3 would have slightly more reduced impacts compared to Alternative 3, and thus would be the environmentally superior alternative. It should be noted, however, that Alternative 3 would achieve fewer project objectives than Alternative 2.

**Table 7-2. Summary Impact Comparison of Proposed Program Alternatives**

| Environmental Resource | Proposed Program Determination | No Project Alternative (Alternative 1) | No New Site Acquisition and New School or Administrative Facilities Alternative (Alternative 2) | Only Whole Site Modernization and Upgrades of Existing School and Administrative Sites (Alternative 3) |
|---|---|---|---|---|
| Aesthetics | Significant and Unavoidable | 0 | -1 | -1 |
| Air Quality and Health Risk | Significant and Unavoidable | 0 | 0 | 0 |
| Biological Resources | Less than Significant with Mitigation | 0 | -1 | -1 |
| Cultural Resources | Significant and Unavoidable | 0 | -1 | -1 |
| Energy | Less than Significant with Mitigation | 0 | -1 | -1 |
| Geology and Soils | Less than Significant with Mitigation | 0 | -1 | -1 |
| Greenhouse Gas Emissions | Significant and Unavoidable | 0 | -1 | -1 |
| Hazards and Hazardous Materials | Less than Significant with Mitigation | 0 | -1 | -1 |
| Hydrology and Water Quality | Less than Significant with Mitigation | 0 | -1 | -1 |
| Noise and Vibration | Significant and Unavoidable | 0 | -1 | -1 |
| Paleontological Resources | Less than Significant with Mitigation | 0 | -1 | -1 |
| Recreation | Less than Significant | 0 | +1 | +1 |
| Transportation | Significant and Unavoidable | 0 | +1 | +1 |
| Tribal Cultural Resources | Less than Significant with Mitigation | 0 | -1 | -1 |

| Environmental Resource | Proposed Program Determination | No Project Alternative (Alternative 1) | No New Site Acquisition and New School or Administrative Facilities Alternative (Alternative 2) | Only Whole Site Modernization and Upgrades of Existing School and Administrative Sites (Alternative 3) |
|---|---|---|---|---|
| Utilities | Less than Significant | 0 | -1 | -1 |
| Wildfire | Significant and Unavoidable | 0 | -1 | -1 |
| **Total[1]** | | **0** | **-11** | **-11** |

[1] Lowest score is environmentally superior

*Notes:*

-2= Substantially Reduced
-1= Slightly Reduced
0 = Similar
+1 = Slightly Greater
+2 = Substantially Greater

Chapter 8
# List of Preparers

## 8.1 Lead Agency – San Diego Unified School District

| | |
|---|---|
| Paul Garcia | Civil/Environmental Project Coordinator/ LEAD PEIR Project Manager |
| Tom Calhoun | Facilities Planning Construction Lead Project Manager |
| Kimberly Chapin | District Legal Counsel |
| Ed Grutzmacher | District Outside Legal Counsel |
| Sarah Hudson | Demographer |

## 8.2 ICF

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| Kathie Washington | Project Director |
| Tristan Evert | Project Manager |
| Kelly Ross | Planner |
| Elyssa Figari | Planner |
| Mary Bilse | Planner |
| Emily Seklecki | Planner |
| Claudia Watts | Planner |
| Marissa Mathias | Planner |
| Jonathan Higginson | Noise Analyst |
| Jakob Rzeszutko | Noise Analyst |
| Matthew McFalls | Air Quality/Greenhouse Gases Analyst |
| Sarah Halterman | Air Quality/Greenhouse Gases Analyst |
| Sandy Lin | Air Quality/Greenhouse Gases Analyst |
| Blake Barroso | Air Quality/Greenhouse Gases Analyst |
| Matthew Stewart | Biologist |
| William Kohn | Biologist |
| Karen Crawford | Senior Cultural Resource Specialist |
| Timothy Yates, Ph.D. | Lead Architectural Historian |
| Karolina Chmiel | Archaeologist |

| | |
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| Lea Kolesky | Architectural Historian |
| Margaret Roderick | Architectural Historian |
| Stephane Hodal | Architectural Historian |
| Teal Zeisler | GIS Analyst |
| David Duncan | GIS Analyst |
| Ken Cherry | Lead Editor |
| Jesse Cherry | Publications Specialist |
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# 8.3 Sub-Consultants

## 8.3.1 Chen Ryan Associates, Inc. – Transportation Impact Analysis

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|---|---|
| Stephen Cook | Principal |
| Andrew Prescott | Transportation Planner |

## 8.3.2 Ninyo & Moore – Hazards Evaluations, Programmatic Level Geological Conditions/Hazards Report

| | |
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| Christina Tretinjak | Senior Project Geologist |
| Gregory T. Farrand | Principal Geologist |
| Marci Richards | Senior Geologist |

## 8.3.3 Rincon Consultants

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| Lisa Bestard | Senior Environmental Scientist |

## 8.3.4 San Diego Natural History Museum

| | |
|---|---|
| Tom Deméré | Curator and Director |
| Katie McComas | Paleontological Report Writer & GIS Support |

## 8.3.5 Ninyo & Moore – Hazards Evaluations, Programmatic Level Geological Conditions/Hazards Report

| | |
|---|---|
| Christina Tretinjak | Senior Project Geologist |
| Gregory T. Farrand | Principal Geologist |

# Chapter 9
# References

## 9.1 Executive Summary

City of San Diego. 2020. *Play All Day Parks Program, Frequently Asked Questions and Concerns*. Available: https://www.sandiego.gov/planning/programs/parkplanning/playallday. Accessed: November 16, 2020.

San Diego Unified School District (District). 2019. Personal communication dated May 6, 2019, from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

## 9.2 Chapter 2: Environmental Setting

San Diego Unified School District (District). 2020. *Departments: Charter Schools*. Available: https://sandiegounified.org/departments/charter_schools. Accessed: November 16, 2020.

## 9.3 Chapter 3: Project Description

City of San Diego. 2020. *Play All Day Parks Program, Frequently Asked Questions and Concerns.* Available: https://www.sandiego.gov/planning/programs/parkplanning/playallday. Accessed: November 16, 2020.

Hudson, Sarah (District). 2018. Email dated August 8, 2018 to Paul Garcia-Craivanu: Re: Project Description.

San Diego Unified School District (District). No Date. *Vision 2020 and Mission Statement*. Available: https://www.sandiegounified.org/vision-2020-and-mission-statement. Accessed: January 10, 2018.

———. 2018. *Charter Schools, Office of*. Available: https://www.sandiegounified.org/charter-schools-office. Accessed: February 22, 2018.

———. 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description. .

———. 2021. *Bond Programs.* Available: Bond Programs - San Diego Unified School District. Accessed: January 5, 2021.

## 9.4 Section 4.1: Aesthetics

City of San Diego. 2008. *City of San Diego General Plan, Urban Design Element*. March. Available: https://www.sandiego.gov/sites/default/files/legacy//planning/genplan/pdf/generalplan/adoptedudelem.pdf.

———. 2019. *Community Profiles*. Available: https://www.sandiego.gov/planning/community/profiles. Accessed: December 2, 2019.

Federal Highway Administration (FHWA). 2015. *Guidelines for the Visual Impact Assessment of Highway Projects*. January. Available: https://www.environment.fhwa.dot.gov/env_topics/other_topics/VIA_Guidelines_for_Highway_Projects.aspx. Accessed: October 20, 2019.

San Diego Unified School District (District). 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

# 9.5 Section 4.2: Air Quality and Health Risk

California Air Pollution Control Officers Association (CAPCOA). 2009. *Health Risk Assessments for Proposed Land Use Projects.* July. Sacramento, CA.

California Air Resources Board (CARB). 2000. *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles.* Sacramento, CA.

———. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective.* April. Available: https://ww3.arb.ca.gov/ch/handbook.pdf. Accessed: August 21, 2019.

———. 2016. *Ambient Air Quality Standards.* May 4. Available: https://ww3.arb.ca.gov/research/aaqs/aaqs2.pdf. Accessed: August 21, 2019.

———. 2017. *Facility Search Results (City of San Diego).* Available: https://www.arb.ca.gov/app/emsinv/facinfo/factox.php?grp=1&dbyr=2017&all_fac=&sort=HRAHi&showpol=&co_=&ab_=&facid_=&dis_=&city_=San+Diego&fsic_=&fname_=&fzip_=&chapis_only=&dd=. Accessed: October 10, 2019.

———. 2019a. *Carbon Dioxide & Health.* Available: https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health. Accessed: August 21, 2019.

———. 2019b. *Overview: Diesel Exhaust & Health.* Available: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health. Accessed: October 3, 2019.

———. 2019c. *iADAM Top 4 Summary.* Available: https://www.arb.ca.gov/adam/topfour/topfour1.php. Accessed: August 21, 2019.

Chen Ryan Associates, Inc. 2019. *San Diego Unified School District Bond Master Plan. Transportation Impact Analysis* (Draft). August.

City of San Diego. 2012. *Trip Generation Manual.* Revised May. Available: https://www.sandiego.gov/sites/default/files/legacy/planning/documents/pdf/trans/tripmanual.pdf. Accessed: November 12, 2019.

Cook, Stephen, Chen Ryan Associates, Inc. Email dated September 10, 2019, to Matthew McFalls, ICF regarding ADT to Peak Hour.

County of San Diego. 2007. *Guidelines for Determining Significance*.

Garcia-Craivanu (a), Paul, San Diego Unified School District. Email dated November 13, 2019, to Sandy Lin, ICF regarding PEIR – GHG Discussion.

Garcia-Craivanu (b), Paul, San Diego Unified School District. Email dated October 9, 2019, to Matthew McFalls, IFC, regarding PEIR GHG/Energy Discussion.

Garcia-Craivanu (c), Paul, San Diego Unified School District. Email dated November 21, 2019, to Sandy Lin, ICF, regarding PEIR GHG/Energy Discussion.

Office of Environmental Health Hazard Assessment. 2015. *Risk Assessment Guidelines.* February. Sacramento, CA.

Prescott, Andrew, Chen Ryan Associates, Inc. Email dated October 1, 2019, to Sandy Lin, ICF, regarding Project Trips.

Ramboll. 2019. *Draft Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District.* December. Sacramento, CA.

Reşitoğlu, Ibrahim A. 2018. *$NO_X$ Pollutants from Diesel Vehicles and Trends in the Control Technologies*. Published November 5. Available: https://www.intechopen.com/online-first/nox-pollutants-from-diesel-vehicles-and-trends-in-the-control-technologies. Accessed: August 21, 2019.

San Diego Air Pollution Control District (SDAPCD). 2016. *Memo: Adoption of 2016 Regional Air Quality Strategy Revision (Districts: All).* December 16. Available: https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Public%20Hearings/Ozone%20Attainment%20Plans/RAQS-Bd_Ltr.pdf. Accessed: August 21, 2019.

———. 2019a. *Attainment Status.* Available: https://www.sdapcd.org/content/sdc/apcd/en/air-quality-planning/attainment-status.html. Accessed: September 30, 2019.

———. 2019b. *K-12 Schools.* Updated August 7. Available: https://www.sdapcd.org/content/sdc/apcd/en/grants-and-incentives/school-buses.html. Accessed: August 21, 2019.

San Diego Association of Governments (SANDAG). 2015. *City of San Diego. Average Traffic Volumes*. Available: https://www.sandag.org/resources/demographics_and_other_data/transportation/adtv/sandiego_adt.pdf. Accessed: October 3, 2019.

San Diego Unified School District (District). n.d. *Educational Specifications*.

———. 2016. *District Standard Design Guide – Standards for New Construction, Additions, and Remodels*. May.

———. 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

South Coast Air Quality Management District (SCAQMD). 2015. *Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party*. Filed April.

U.S. Environmental Protection Agency (EPA). 2000. *Regulatory Impact Analysis: Heavy-Duty Engine Vehicle Standards and Highway Diesel Fuel Sulfur Control Requirements.* December. Available:

https://nepis.epa.gov/Exe/ZyPDF.cgi/P100K576.PDF?Dockey=P100K576.PDF. Accessed: April 29, 2020.

———. 2002. *Health Assessment Document for Diesel Engine Exhaust.* May. Available: https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=300055PV.PDF. Accessed: August 21, 2019.

———. 2016. *Health Effects of Ozone in the General Population.* Last updated September 12. Available: https://www.epa.gov/ozone-pollution-and-your-patients-health/health-effects-ozone-general-population. Accessed: August 21, 2019.

———. 2018a. *Health and Environmental Effects of Particulate Matter (PM).* Last updated June 20. Available: https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm. Accessed: August 21, 2019.

———. 2018b. *Monitoring Values Report.* Last updated July 31. Available: https://www.epa.gov/outdoor-air-quality-data/monitor-values-report. Accessed: August 21, 2019 and October 9, 2019.

———. 2019a. *Health Effects of Ozone Pollution.* Updated July 30, 2019. Available: https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution. Accessed: August 21, 2019.

———. 2019b. *Sulfur Dioxide Basics*. Last updated April 2. www.epa.gov/so2-pollution/sulfur-dioxide-basics#effects. Accessed: September 20, 2019.

Weather Channel. 2019. San Diego, CA Monthly Weather. Available: https://weather.com/weather/monthly/l/4b9990352e6d99a04c6280505f7d740ed052b69b03424ef3cf8201d9fc9a5c49. Accessed: August 21, 2019.

Western Regional Climate Center. 2019. *Cooperative Climatological Data Summaries* (S. California, Poway Valley, San Diego Wso Airport). Available: https://wrcc.dri.edu/summary/Climsmsca.html. Accessed: September 30, 2019.

# 9.6 Section 4.3: Biological Resources

Beauchamp, R. M. 1986. *A Flora of San Diego County, California*. Sweetwater Press, National City, CA.

California Department of Fish and Wildlife (CDFW). 2019. California Natural Diversity Database (CNDDB) RareFind 5 Report.

City of San Diego. 1997. *Multiple Species Conservation Program: City of San Diego Subarea Plan*. March. Available: https://www.sandiego.gov/sites/default/files/legacy//planning/programs/mscp/pdf/subareafullversion.pdf.

Holland, R. F. 1986. *Preliminary Descriptions of the Terrestrial Natural Communities of California. Unpublished report*. California Department of Fish and Game, Natural Heritage Division, Sacramento, CA.

Oberbauer, Thomas, Meghan Kelly, and Jeremy Buegge. 2008. *Draft Vegetation Communities of San Diego County*. Available: https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-

Documents/Final-EIR-Files/references/rtcref/ch9.0/rtcrefaletters/O14%202014-12-19_OberbauerTM2008.pdf.

San Diego Unified School District (District). 2012. *Final Vernal Pool Restoration/Enhancement Plan as Mitigation for the Jonas Salk Area Elementary School Project*. Prepared by AECOM. September. Available: https://www.sandiegounified.org/sites/default/files_link/district/files/facilities/environmental_studies/salk/Biology-Rest_Plan.pdf.

———. 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

# 9.7 Section 4.4: Cultural Resources

Almstedt, Ruth. 1974. *Bibliography of the Diegueño Indians*. Ballena Press, Ramona.

———. 1980. *Ethnohistoric Documentation of Puerta La Cruz, San Diego County, California.* California Department of Transportation, San Diego.

ASM Affiliates and ICF. 2015. *Modern San Diego Public School Development*. Historic Context Statement on File with the San Diego Unified School District.

Baker, Lindsay. 2012. *A History of School Design and its Indoor Environmental Standards, 1900 to Today.* January 2012. National Clearing House for Educational Facilities, National Institute of Building Sciences. Available: http://www.ncef.org/pubs/greenschoolshistory.pdf. Accessed: October 30, 2012.

Bean, Walton, and James J. Rawls. 2003. *California: An Interpretive History*. 8th ed. McGraw-Hill Publishing, San Francisco, California.

Brown, Joanne. 1988. A is for Atom, B is for Bomb: Civil Defense in American Public Education, 1947-1963. *Journal of American History*, 75 (June, 1988):68–90.

Bull, Charles. 1983. *Shaking the Foundations: The Evidence of San Diego Prehistory*. Cultural Resource Management Casual Papers Vol. 1, No. 3:15–64. Department of Anthropology, San Diego State University.

Carrico, Richard L. 1998. Ethnohistoric Period. In *Prehistoric and Historic Archaeology of Metropolitan San Diego: A Historic Properties Background Study*. Draft document. ASM Affiliates, Inc. Submitted to Metropolitan Wastewater Public Works, San Diego, California. University.

City of San Diego. 2007. *San Diego Modernism: Historic Context Statement*. Submitted to the State Office of Historic Preservation per Certified Local Government Grant Requirements October 17.

Englehardt, Zephyrin. 1920. *San Diego Mission*. James H. Barry Company, San Francisco.

Ezell, P. H. 1987. The Harris Site—An Atypical San Dieguito Site or Am I Beating a Dead Horse? Pages 15–22 in D. Gallegos (ed.), *San Dieguito-La Jolla: Chronology and Controversy*. San Diego County Archaeological Society Research Paper 1. San Diego.

Farris, Glenn. 1997. Captain Jose Panto and the San Pascual Indian Pueblo in San Diego County, 1835-1878. *The Journal of San Diego History* 43 (Spring). Available: http://www.sandiegohistory.org/journal/97spring/panto.htm. Accessed: January 7, 2015.

Freeley, Jennifer, Tricia Olsen, Ricki Siegel, Ginger Weatherford, and Historic Resources Board Staff. 2011. *Biographies of Established Masters.* San Diego Historic Resources Board, City of San Diego. Available: http://www.sandiego.gov/planning/programs/historical/pdf/201109biographies.pdf. Accessed: July 4, 2012.

Gallegos, Dennis R. 1985. *Batiquitos Lagoon Revisited*. Cultural Resource Management Casual Papers Vol. 2, No. 1. Department of Anthropology, San Diego State University.

———. 1987. A Review and Synthesis of Environmental and Cultural Material for the Batiquitos Lagoon Region. Pages 23–24 in D. Gallegos (ed.), *San Dieguito-La Jolla: Chronology and Controversy.* San Diego County Archaeological Society Research Paper No. 1, San Diego.

———. 1991. Antiquity and Adaptation at Agua Hedionda, Carlsbad, California. Pages 19–42 in J. M. Erlandson and R. H. Colten (eds.), *Hunter-Gatherers of Early Holocene Coastal California*. Perspectives in California Archaeology, Vol. 1, J. E. Arnold, general editor, Institute of Archaeology, University of California, Los Angeles.

GEI Consultants, Inc. and Mead and Hunt, Inc. 2017. *Mid-Century Modern in the City of Sacramento: Historic Context Statement and Survey Results.* September 30. Prepared for the City of Sacramento, Community Development Department, Sacramento, California.

Gelernter, Mark. 1999. *A History of American Architecture: Buildings in Their Cultural and Technological Context*. Lebanon, NH: University Press of New England.

Griffin, Ernst C. and John R. Weeks. 2004. People the Region: San Diego's Population Patterns. Pages 75–90 in Philip R. Pride, *San Diego: An Introduction to the Region (Fourth Edition)*. Sunbelt Publications, Inc./Pearson Custom Publishing, San Diego, California.

Hedges, Kenneth. 1975. Notes on the Kumeyaay: A Problem of Identification. *The Journal of California Anthropology* 2(1):71–83.

Historic Resources Group. 2011. *Greater North Park Community Plan Area Historic Resources Survey.* April. Prepared for the City of San Diego.

ICF. 2016. *Section 106 Inventory and Evaluation Report for the Tenth Avenue Marine Terminal Transit Shed Demolition and Initial Rail Component, San Diego, California*. June. Prepared for the San Diego Unified Port District.

——. 2017. *Cultural Resources Inventory and Evaluation Report for the Logan Heights Education Center Project, San Diego, California*. April. Prepared for the San Diego Unified School District.

Koerper, Henry C. 1979. The Question of the Chronological Placement of the Shoshonean Presence in Orange County, California. *Pacific Coast Archaeological Society Quarterly* 15(3):69–84.

Koerper, Henry C., Paul E. Langenwalter II, and Adella Schroth. 1991. Early Holocene Adaptations and the Transition Phase Problem: Evidence from the Allan O. Kelly Site, Agua Hedionda Lagoon. Pages 43–62 in J. M. Erlandson and R. H. Colten (eds.), *Hunter-Gatherers of Early Holocene Coastal California*. Perspectives in California Archaeology, Vol. 1, J. E. Arnold, general editor, Institute of Archaeology, University of California, Los Angeles.

Kroeber, Alfred L. 1925. *Handbook of the Indians of California*. Bureau of American Ethnology Bulletin 78. Smithsonian Institution, Washington, D. C.

Langdon, Margaret. 1975. Kamia and Kumeyaay: A Linguistic Perspective. *The Journal of California Anthropology* 2(1):64–70.

Lee, Melicent, 1937. *Indians of the Oaks*. Ginn and Co., Boston.

Los Angeles Conservancy. 2019. *Late Moderne*. Available: https://www.laconservancy.org/architectural-style/late-moderne. Accessed: July 29, 2019.

Luomala, Katherine. 1963. Flexibility in Sib Affiliation Among the Diegueño. *Ethnology* 2(3): 282–301.

———. 1978. Tipai-Ipai. Pages 592–608 in R. F. Heizer (ed.), *California*. Handbook of North American Indians, Vol. 8, W.C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

McDonald, M., and J. Eighmey. 1998. Late Period Prehistory. In *Draft Report Prehistoric and Historic Archaeology of Metropolitan San Diego: A Historic Properties Background Study*. ASM Associates for Metropolitan Wastewater.

Meighan, Clement. 1954. A Late Complex in Southern California Prehistory. *Southwestern Journal of Anthropology* 10:215–227.

Minshall, Jane. 1974. *Report on Land & Facilities Planning,* San Diego Unified School District Business Services Division. September 24. Bio Folder 156: Mil-Moe, San Diego History Center, San Diego, California.

Moriarty, James R., III. 1969. The San Dieguito Complex: Suggested Environmental and Cultural Relationship. *Anthropological Journal of Canada* 6(3):1–18.

———. 1987. A Separate Origins Theory for Two Early Man Cultures in California: Environmental and Cultural Material for the Batiquitos Lagoon Region. Pages 49–60 in D. R. Gallegos (ed.), *San Dieguito-La Jolla: Chronology and Controversy*. San Diego County Archaeological Society Research Paper No. 1, San Diego.

Moyer, Cecil C., and Richard F. Pourade. 1969. *Historic Ranchos of San Diego*. Union-Tribune Publishing Company, Copley Books, San Diego, California.

Ogata, Amy F. 2008. Building for Learning in Postwar American Elementary Schools. *Journal of the Society of Architectural Historians*, 67 (December, 2008): 562–591.

Pitman, Todd. No Date. *Lloyd Pietrantonio Ruocco, 1907-1981*. Modern San Diego Real Estate Website—Architects—Lloyd Pietrantonio Ruocco. Available: http://www.modernsandiego.com/LloydRuocco.html. Accessed: August, 2012.

Pourade, Richard F. 1960. *The Explorers: the History of San Diego*. Union-Tribune Publishing, San Diego.

———. 1961. *Time of the Bells: the History of San Diego*. Union-Tribune Publishing, San Diego.

———. 1977. *City of the Dream*. Copley Books, La Jolla, California.

Rogers, Malcolm J. 1939. *Early Lithic Industries of the Lower Basin of the Colorado River and Adjacent Desert Areas*. San Diego Museum Papers No. 3.

———. 1945. An Outline of Yuman Prehistory. *Southwestern Journal of Anthropology* 1(2):167–198.

———. 1966. *Ancient Hunters of the Far West*, edited by R. F. Pourade, pp. 21–108. Copley Press, La Jolla, California.

Sahlins, Marshall, 1968. *Tribesmen*. Foundations of Modern Anthropology Series, Marshall D. Sahlins. editor, Prentice-Hall, New York.

*San Diego Tribune*. 1954. San Diego Schools Landscaping Begins on Woman's Drafting Board. News Clip from Bio Folder 156: Mil-Moe, San Diego History Center, San Diego, California.

San Diego Unified School District (District). 1954. *100 Years of Public Education in San Diego, July 1, 1854 to June 30, 1954: San Diego City Schools Report to the Community, 1954.* Available: http://www.sandi.net/page/25. Accessed: July 20, 2012.

———. 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

Sapphos Environmental, Inc. 2014. *Los Angeles Unified School District Historic Context Statement, 1870-1969.* Prepared for the Los Angeles Unified School District (LAUSD) Office of Environmental Health and Safety. March.

Service. Elman R. 1966. *The Hunters*. Foundations of Modern Anthropology Series, Marshall D. Sahlins. editor, Prentice-Hall, New York.

———. 1971. *Primitive Social Organization: An Evolutionary Perspective*. Random House, New York.

Sherman, Lola. 2001. *A History of North San Diego County: From Mission to Millennium*. Heritage Media Group. Carlsbad, California.

Shipek, Florence C. 1982. Kumeyaay Socio-Political Structure. *Journal of California and Great Basin Anthropology* 4(2):296–303.

———. 1989. Mission Indians and Indians of California Land Claims. *American Indian Quarterly* 13(4), Special Issue: The California Indians (Autumn): 409–420.

———. 1991. *Delfina Cuero: Her Autobiography, An Account of her Last Years, and Her Ethnobotanic Contributions*. Ballena Press, Menlo Park, California.

Spier, Leslie. 1923. *Southern Diegueño Customs*. University of California Publications in American Archaeology and Ethnology Vol. 20:294-358.

True, Delbert L. 1958. An Early Complex in San Diego County, California. *American Antiquity* 23(3):255–263.

———. 1966. *Archaeological Differentiation of Shoshonean and Yuman Speaking Groups in Southern California*. Ph.D. dissertation, University of California, Los Angeles.

———. 1970. *Investigation of a Late Prehistoric Complex in Cuyamaca Rancho State Park, San Diego County, California*. Archaeological Survey Monograph, University of California, Los Angeles.

———. 1980. The Pauma Complex in Northern San Diego County: 1978. *Journal of New World Archaeology* 3(4):1–30.

True, Delbert L., and Eleanor Beemer. 1982. Two Milling Stone Inventories from Northern San Diego County, California. *Journal of California and Great Basin Anthropology* 4(2):233–261.

True, Delbert L., Clement W. Meighan, and Harvey Crew. 1974. Archaeological Investigations at Molpa, San Diego County, California*. University of California Publications in Anthropology* Vol. 11. University of California Press, Berkeley.

U.S. Department of the Interior, National Park Service. 1988. *How to Apply the National Register Criteria for Evaluation.* National Register Bulletin 15.

Wallace, W. J. 1955. Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11.

Warren, Claude N. 1966. *The San Dieguito Type Site: M. J. Rogers' 1938 Excavation on the San Dieguito River*. San Diego Museum Paper No. 6, San Diego.

———. 1967. The San Dieguito Complex: A Review and Hypothesis. *American Antiquity* 32(2):168–185.

———. 1968. Cultural Tradition and Ecological Adaptation on the Southern California Coast. Pages 1–14 in C. Irwin-Williams (ed.), *Archaic Prehistory in the Western United States*. Eastern New Mexico Contributions in Anthropology 1(3). Portales, New Mexico

———. 1987. The San Dieguito and La Jolla: Some Comments. Pages 73–85 in D. R. Gallegos (ed.), *San Dieguito-La Jolla: Chronology and Controversy*. San Diego County Archaeological Society Research Paper No. 1, San Diego.

Warren, Claude N., and Delbert L. True. 1961. *The San Dieguito Complex and Its Place in San Diego County Prehistory*. Archaeological Survey Annual Report, 1960–1961, pp. 246–291. University of California, Los Angeles.

Warren, Claude N., Gretchen Siegler, and Frank Dittmer. 1998. Paleoindian and Early Archaic Periods. In *Prehistoric and Historic Archaeology of Metropolitan San Diego: A Historic Properties Background Study*. Unpublished draft report. ASM Affiliates.

White, Raymond C. 1963. *Luiseño Social Organization*. University of California Publications in American Archaeology and Ethnology Vol. 48, No. 2:91–194.

# 9.8 Section 4.5 Energy

California Energy Commission (CEC). 2018. *2017 Power Content Label – San Diego Gas & Electric*. July Available: https://ww2.energy.ca.gov/pcl/labels/2017_labels/SDG_and_E_2017_PCL.pdf. Accessed: December 31, 2019.

———. 2019. *2018 Power Content Label – San Diego Gas & Electric*. Available: https://www.energy.ca.gov/sites/default/files/2020-01/2018_PCL_San_Diego_Gas_and_Electric.pdf. Accessed: May 2020.

———. 2020a. Electricity Consumption by Entity. Available: https://ecdms.energy.ca.gov/elecbyutil.aspx. Accessed: May 2020.

———. 2020b. *Gas Consumption by Entity.* Available: https://ecdms.energy.ca.gov/gasbyutil.aspx. Accessed: May 2020.

City of San Diego. 2003. *Trip Generation Manual*. May. Available: https://www.sandiego.gov/sites/default/files/legacy/planning/documents/pdf/trans/tripmanual.pdf. Accessed: June 2020.

———. 2020. *City of San Diego's Climate Action Plan*. Available: https://www.sandiego.gov/sustainability/climate-action-plan. Accessed: January 16, 2020.

Collaborative for High Performance Schools (CHPS). 2014*. US-CHPS Criteria – New Construction and Renovation.* Available: https://chps.net/sites/default/files/US-CHPS__Criteria_2014_2016%20update_170706.pdf. Accessed: November 15, 2019.

Garcia-Craivanu, Paul. August 27, 2020. Conference call with Sandy Lin.

San Diego Association of Governments (SANDAG). 2020. *Energy and Climate Change.* Available: https://www.sandag.org/index.asp?subclassid=46&fuseaction=home.subclasshome. Accessed: January 6, 2020.

San Diego Unified School District (District). 2003. *Resolution in the Matter of Adopting the Collaborative for High Performance Schools Criteria in Designing, Building, and Operating All New Schools to Be Built in the District.* Available: https://chps.net/sites/default/files/031118_SDUSD-CHPS_Resolution.pdf. Accessed: November 15, 2019.

———. 2014. *Environmental Sustainability Advisory Committee Final Report*. June 24. Available: https://www.sandiegounified.org/sites/default/files_link/district/files/special-projects/06-25-14%20ESAC%20REPORT%20FINAL.pdf. Accessed: August 20, 2019.

———. 2016. *District Standard Design Guide – Standards for New Construction, Additions, and Remodels.* May.

———. 2017. *District Standard Design Guide – Solar PV Design Guide*. September.

———. 2019a. *Architect's Professional Services Manual*. June.

———. 2019b. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

———. No Date. *Educational Specifications.*

U.S. Energy Information Administration. 2017 a. *State Energy Production Estimates.* Available: https://www.eia.gov/state/seds/sep_prod/SEDS_Production_Report.pdf. Accessed: January 6, 2020.

———. 2017b. *California State Energy Profile.* Available: https://www.eia.gov/state/print.php?sid=CA. Accessed: September 24, 2019.

# 9.9 Section 4.6: Geology and Soils

California Department of Education. 2019. *School Site Selection and Approval Guide*. Available: https://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp. Accessed: September 9, 2019.

City of San Diego. 2008. *Seismic Safety Study, Geologic Hazards and Faults*. Available: https://www.sandiego.gov/sites/default/files/legacy/development-services/industry/hazards/pdf/seismicstudy.pdf. Accessed: October 2, 2019.

County of San Diego. Office of Emergency Services. 2010. *Multi-jurisdictional Hazard Mitigation Plan.* Available: http://www.sandiegocounty.gov/content/dam/sdc/oes/docs/2010-HazMit-Final-August-2010.pdf. Accessed: October 24, 2019.

Kennedy and Tan. 2009. Kennedy, M.P., and Tan, S.S., 2008, Geologic Map of the San Diego 30' x 60' Quadrangle, California, Scale 1:100,000.

San Diego Unified School District (District). 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

State of California, Division of the State Architect. 2019. *About Us.* Available: https://www.dgs.ca.gov/DSA/About. Accessed: November 27, 2019.

Tan. 1995. *Landslide Hazards in the Southern Part of the San Diego Metropolitan Area, San Diego County, California.* Landslide Hazard Identification Map No. 33, Open-File Report 95-03.

United States Department of Agriculture (USDA). 2019. *USDA Natural Resources Conservation Service (NRCS) Web Soil Survey.* Available: http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx. Accessed: June 2019.

United States Geological Survey (USGS). 2019. *Areas of Land Subsidence in California*. Available: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed: October 24, 2019.

# 9.10 Section 4.7: Greenhouse Gas Emissions

Association of Environmental Professionals. 2016. *Final White Paper Beyond 2020 and Newhall.* October 18. Available: https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf. Accessed: February 8, 2021.

Bay Area Air Quality Management District. 2017. *California Environmental Quality Act. Air Quality Guidelines*. May. Available: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: February 8, 2021.

California Air Pollution Control Officers Associations (CAPCOA). 2008. *CEQA & Climate Change.* January. Available: http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf. Accessed: February 8, 2021.

California Air Resources Board (CARB). 2017a. *Short-Lived Climate Pollutant Reduction Strategy*. Available: https://ww2.arb.ca.gov/sites/default/files/2018-12/final_slcp_report%20Final%202017.pdf. Accessed: February 8, 2021.

———. 2017b. *The 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 GHG Target*. November. Available:

———. 2017c. Small Engines in California. August. Available: https://ww2.arb.ca.gov/resources/fact-sheets/small-engines-california. Accessed: February 8, 2021.

———. 2019a. *GHG Global Warming Potentials.* Available: https://ww2.arb.ca.gov/ghg-gwps. Accessed: February 8, 2021.

———. 2019b. *California Greenhouse Gas Emission Inventory – 2020 Edition.* Last reviewed August 12. Available: https: https://ww2.arb.ca.gov/ghg-inventory-data. Accessed: February 8, 2021.

———. 2019c. *SB 375 Regional Plan Climate Targets*. Available: https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets. Accessed: February 8, 2021

———. 2019d. *2019 GHG Inventory.* Available: https://ww2.arb.ca.gov/ghg-inventory-data. Accessed: February 8, 2021.

California Energy Commission (CEC). 2017. The California Clean Energy Jobs Act, Proposition 39 K-12 Program. March. Available: https://www.energy.ca.gov/sites/default/files/2019-06/Prop_39_Fact_Sheet.pdf. Accessed: February 8, 2021.

California Governor's Office of Planning and Research (OPR). 2018. *Discussion Draft CEQA and Climate Change Advisory*. December. Available: http://opr.ca.gov/docs/20181228-Discussion_Draft_Climate_Change_Adivsory.pdf. Accessed: February 8, 2021.

CalRecycle. 2020. School Waste Reduction Laws. Available: https://www.calrecycle.ca.gov/recycle/schools/laws. Accessed: February 8, 2021.

Chen Ryan Associations, Inc. 2019. San Diego Unified School District Bond Master Plan. Transportation Impact Analysis (Draft). August.

City of San Diego. 2003. *Trip Generation Manual.*

———. 2008. *City of San Diego General Plan.* Adopted March. Available: https://www.sandiego.gov/planning/genplan. Accessed: February 8, 2021.

———. 2015a *City of San Diego Climate Action Plan.* Adopted December. Available: https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf. Accessed: February 8, 2021.

———. 2015b. *City of San Diego Zero Waste Plan.* June. Available: https://www.sandiego.gov/sites/default/files/zwplan.pdf. Accessed: February 8, 2021.

Collaborative for High Performance Schools (CHPS). 2014. *US-CHPS Criteria – New Construction and Renovation.* Available: https://chps.net/sites/default/files/US-CHPS_Criteria_2014_2016%20update_170706.pdf. Available: February 8, 2021.

Energy Futures Initiative. 2019. *Cleaning the Air.* September. Available: https://www.dropbox.com/s/2y36ngfrcbpv37f/EFI%20Clearing%20the%20Air%20Full%20Report.pdf?dl=0. Accessed: February 8, 2021.

Garcia-Craivanu, Paul (District) (a). November 13, 2019. Email to Sandy Lin: RE: PEIR – GHG Discussion.

Garcia-Craivanu, Paul (District) (b). October 9, 2019. Email to Matthew McFalls: RE: RE: Program EIR GHG/Energy Discussion.

Garcia-Craivanu, Paul (District) (c). August 27, 2020. Conference call with Sandy Lin: RE: Programmatic EIR.

Garcia-Craivanu, Paul (District) (d). January 7, 2021. Conference call with Darin Vey, Blake Barroso and Matthew McFalls: RE: Capital Improvement Project EIR Greenhouse Gas Discussion.

Intergovernmental Panel on Climate Change (IPCC). 2001. *Climate Change 2001: The Scientific Basis.* Available: https://www.ipcc.ch/report/ar3/wg1/. Accessed: February 8, 2021.

———. 2018. *Special Report: Global Warming of 1.5 C. Summary for Policy Makers.* Available: https://www.ipcc.ch/sr15/chapter/spm/. Accessed: February 8, 2021.

Lempert, Robert, Preston, Benjamin, Edmonds, Jae, Clarke, Leon, Wild, Tom, Binsted, Matthew, Diringer, Elliot, Townsend, Brad. 2019. *Pathways to 2050: Alternative Scenarios for Decarbonizing the U.S. Economy*. May. Available: https://www.c2es.org/site/assets/uploads/2019/05/pathways-to-2050-scenarios-for-decarbonizing-the-us-economy-final.pdf. Accessed: February 8, 2021.

Mahone, Amber, Zachary Subin, Jenya Kahn-Lang, Douglas Allen, Vivian Li, Gerrit De Moor, Nancy Ryan, Snuller Price. 2018. *Deep Decarbonization in a High Renewables Future: Updated Results from the California PATHWAYS Model.* California Energy Commission. Publication Number: CEC-500-2018-012.

National Public Radio (NPR). 2021. *Biden Moves To Have U.S. Rejoin Climate Accord*. Available: https://www.npr.org/sections/inauguration-day-live-updates/2021/01/20/958923821/biden-moves-to-have-u-s-rejoin-climate-accord. Accessed: February 8, 2021.

Prescott, Andrew (Chen Ryan). October 1, 2019 and October 2, 2019. Email to Sandy Lin. RE: Program Trips.

San Diego Air Pollution Control District (SDAPCD). 2019. *Climate and Pollution*. Available: https://www.sdapcd.org/content/sdc/apcd/en/air-quality-planning/Climate_and_Pollution.html. Accessed: February 8, 2021.

San Diego Association of Governments (SANDAG). 2015. *2050 Regional Transportation Plan*. Adopted October. Available: https://sdforward.com/pdfs/Final_PDFs/The_Plan_combined.pdf. Accessed: February 8, 2021.

San Diego Unified School District (District). 2003. *Resolution in the matter of adopting the Collaborative for High Performance Schools Criteria in Designing, Building, and Operating All New Schools to be Built in the District.* Available: https://chps.net/sites/default/files/031118_SDUSD-CHPS_Resolution.pdf. Accessed: February 8, 2021.

———. 2014. *Environmental Sustainability Advisory Committee Final Report.* June 24.

———. 2016. *District Standard Design Guide – Standards for New Construction, Additions, and Remodels*. May.

———. 2017a. Policies and Procedures. Available: https://sandiegounified.org/about/policies_procedures. Accessed: February 8, 2021.

———. 2017b. Climate Adaptation and Mitigation Goals Presentation. Available: https://go.boarddocs.com/ca/sandi/Board.nsf/files/ASAVLM81489D/$file/10-24-17%20Climate%20Mitigation%20and%20Adaptation%20Goals%20PowerPoint_REV10.18.17%20ld.pdf. Accessed: February 8, 2021.

———. 2017c. *District Standard Design Guide – Solar PV Design Guide*. September.———. 2019a. *Architect's Professional Services Manual.* June

———. 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

———. No Date. *Educational Specifications*.

South Coast Air Quality Management District. 2008. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plan.* Available: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2. Accessed: February 8, 2021.

United Nations. 2018. *Emissions Gap Report 2018*. December 5. Available: https://www.ipcc.ch/site/assets/uploads/2018/12/UNEP-1.pdf. Accessed: February 8, 2021.

United States Environmental Protection Agency (EPA). 2020. *Inventory of U.S. Greenhouse Gas Emissions and Sinks.: 1990-2018*. Available: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2018. Accessed: February 8, 2021.

# 9.11 Section 4.8: Hazards and Hazardous Materials

California Department of Toxic Substances Control (DTSC). 2006. *Fact Sheet, June 2006. Special Schools Cleanup Guidance; Dealing with Lead-Based Paint, Termiticides, and Electrical Transformers at Proposed New or Expanding School Sites.* Available: https://dtsc.ca.gov/dealing-with-lead-based-paint-termiticides-and-electrical-transformers-at-proposed-new-or-expanding-school-sites-fact-sheet/. Accessed: May 8, 2020.

———. 2020a. *Envirostor, Rosedale Field and Bombing Target (80001221).* Available: https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=80001221. Accessed: May 8, 2020.

———. 2020b. *Envirostor, Linda Vista Landing Field (80000917).* Available: https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=80000917. Accessed: May 8, 2020.

———. 2020c. *Envirostor, Camp Elliott J09CA0067 (37970025).* Available: https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=37970025. Accessed: May 8, 2020.

San Diego Unified School District (District). 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

U.S. Army Corps of Engineers (USACE). 2020. *Camp Elliott.* Available: https://www.spl.usace.army.mil/Missions/Formerly-Used-Defense-Sites/Camp-Elliott/. Accessed: May 8, 2020.

U.S. Department of Labor, Occupational Safety & Health Administration (OSHA). 1995. *Asbestos Standard for General Industry.* Available: https://www.osha.gov/Publications/osha3095.html. Accessed: October 12, 2020.

# 9.12 Section 4.9: Hydrology and Water Quality

California Department of Conservation. 2009. *Tsunami Inundation Map for Emergency Planning, Del Mar, La Jolla, Point Loma, and National City Quadrangles*. June 1, 2009. Available: https://www.conservation.ca.gov/cgs/tsunami/maps/San-Diego. Accessed: September 9, 2019.

California Department of Water Resources (DWR). 2004. *Mission Valley Groundwater Basin*. Available: https://water.ca.gov/LegacyFiles/pubs/groundwater/bulletin_118/basindescriptions/9-14.pdf. Accessed: October 21, 2019.

———. 2018. *9-033 Coastal Plain of San Diego*. Available: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/B118-Basin-Boundary-Descriptions-2016/B118-Basin-Boundary-Description-2016---9_033.pdf. Accessed: October 21, 2019.

City of San Diego. 2008. *General Plan, Conservation Element*. Available: https://www.sandiego.gov/sites/default/files/legacy//planning/genplan/pdf/2012/ce120100.pdf. Accessed: September 10, 2019.

———. 2015. *Jurisdictional Runoff Management Plan (JRMP).* Available: https://www.sandiego.gov/stormwater/plansreports/jrmp. Accessed: September 9, 2019.

———. 2016. 2015 *Urban Water Management Plan*. June 2016. Available: https://www.sandiego.gov/sites/default/files/2015_uwmp_report.pdf. Accessed: September 10, 2019.

———. 2018. *General Plan, Public Facilities, Services & Safety Element.* Available: https://www.sandiego.gov/sites/default/files/pf_2018-_final.pdf. Accessed: September 10, 2019.

———. 2019a. *Think Blue – City of San Diego Watersheds*. Available: https://www.sandiego.gov/thinkblue/public-education/watershed-coordination. Accessed: September 9, 2019.

———. 2019b. *Tsunami Awareness and Preparedness*. Available: https://www.sandiego.gov/ohs/resources/preparedness/tsunami. Accessed: September 10, 2019.

———. 2019c. *Public Utilities Water Supply*. Available: https://www.sandiego.gov/public-utilities/sustainability/water-supply. Accessed: September 10, 2019.

Project Clean Water. 2019a. *Los Peñasquitos WMA*. Available: http://www.projectcleanwater.org/los-penasquitos-wma/. Accessed: September 9, 2019.

———. 2019b. *Mission Bay and La Jolla Watershed Management Area (WMA)*. Available: http://www.projectcleanwater.org/mission-bay-la-jolla-wma/. Accessed: September 9, 2019.

———. 2019c. *San Diego Bay WMA*. Available: http://www.projectcleanwater.org/san-diego-bay-wma/. Accessed: September 9, 2019.

———. 2019d. *San Diego River WMA*. Available: http://www.projectcleanwater.org/san-diego-river-wma/. Accessed: September 9, 2019.

San Diego Regional Water Quality Control Board (San Diego RWQCB). 2016. *The Basin Plan*. May 17, 2016. Available: https://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/. Accessed: September 9, 2019.

San Diego Unified School District (District). 2019a. *Stormwater Compliance*. Available: https://www.sandiegounified.org/stormwater-compliance. Accessed: September 9, 2019.

———. 2019b. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

State Water Resources Control Board (SWRCB). 2017. *2014 and 2016 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)*. Available: https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml. Accessed: September 17, 2019.

———. 2018. *Upcoming Storm Water Requirements for K12 School Districts and Community College Districts Presentation*. May 14, 2018. Available: https://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/phase_ii_municipal/school_districts_soft_outreach_presentation.pdf. Accessed: September 10, 2019.

# 9.13 Section 4.10: Noise and Vibration

California Department of Transportation (Caltrans). 2013a. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. Final. CT HWANP-RT-13-069.25.2. Sacramento, CA. Prepared by: California Department of Transportation, Division of Environmental Analysis, Environmental Engineering, Hazardous Waste, Air, Noise, and Paleontology Office, Sacramento, CA.

———. 2013b. *Transportation and Construction Vibration Guidance Manual*. Final. CT-HWANP-RT-13-069.25.3. September. Sacramento, CA.

City of San Diego. 2015. *Noise Element of the General Plan*. June 2015.

———. 2016. *California Environmental Quality Act Significance Determination Thresholds.* Available: https://www.sandiego.gov/sites/default/files/july_2016_ceqa_thresholds_final_0.pdf.

San Diego Unified School District (District). 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

U.S. Department of Transportation/Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment Manual*. Final. FTA Report No. 0123. September 2018. Washington, DC. Prepared by Volpe National Transportation Systems Center. Cambridge, MA.

U.S. Environmental Protection Agency. 1977. *Speech Levels in Various Noise Environments*. May 1977. Washington DC.

U.S. Federal Highway Administration (FHWA). 2008. FHWA Roadway Construction Noise Model (RCNM), Software Version 1.1. December 8, 2008. Prepared by: U.S. Department of Transportation, Research and Innovative Technology Administration, John A. Volpe National Transportation Systems Center, Environmental Measurement and Modeling Division.

Wieland Acoustics. 2009. *Environmental Noise Study for the Proposed Master Plan Improvements at Four Schools in the City of Costa Mesa.* May 20, 2009. Irvine, CA.

World Health Organization (WHO). 1999. *Guidelines for Community Noise*. April 1999. London, United Kingdom.

# 9.14 Section 4.11: Paleontological Resources

City of San Diego. 2016*. California Environmental Quality Act, Significance Determination Thresholds*.

County of San Diego. 2007. *Guidelines for Determining Significance, Unique Geology*. July 30, 2007.

Deméré, T. A., and S. L. Walsh. 1993. *Paleontological Resources, County of San Diego*. Technical report prepared for the Department of Public Works, County of San Diego. 68 pp.

Kennedy, M. P. 1975. Geology of the San Diego Metropolitan Area, California. Section A – Western San Diego Metropolitan Area. *California Division of Mines and Geology, Bulletin* 200:9–39.

Kennedy, M. P., and S. S. Tan. 2008. Geologic Map of the San Diego 30' x 60' Quadrangle, California. California Geological Survey, Regional Geologic Map Series 1:100,000 scale, map no. 3.

San Diego Unified School District (District). 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

Walsh, S. L. 1996. Middle Eocene Mammal Faunas of San Diego County, California. Pages 75–119 in D. R. Prothero and R. J. Emry (eds.), *The Terrestrial Eocene-Oligocene Transition in North America*. Cambridge University Press.

Walsh, S. L., D. R. Prothero, and D. J. Lundquist. 1996. Stratigraphy and Paleomagnetism of the Middle Eocene Friars Formation and Poway Group, Southwestern San Diego County, California. Pages 120–154 in D. R. Prothero and R. J. Emry (eds.), *The Terrestrial Eocene-Oligocene Transition in North America*. Cambridge University Press.

# 9.15 Section 4.12: Recreation

City of San Diego. 2015. *General Plan Recreation Element*. Available: https://www.sandiego.gov/sites/default/files/re_2015.pdf. Accessed: August 29, 2019.

———. 2019a. *Fast Facts.* Parks and Recreation Department. Available: https://www.sandiego.gov/sites/default/files/fastfacts.pdf. Accessed: January 3, 2020.

———. 2019b. *General Information.* Parks and Recreation Department. Available: https://www.sandiego.gov/park-and-recreation/general-info. Accessed: January 3, 2020.

San Diego Unified School District (District). 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

# 9.16 Section 4.13: Transportation

California Department of Transportation (Caltrans). 2014. *California Manual on Uniform Traffic Control Devices*. Revised 2020. Available: https://dot.ca.gov/programs/traffic-operations/camutcd/camutcd-rev5.

City of San Diego. 2006. *Pedestrian Master Plan*. December. Available: https://www.sandiego.gov/sites/default/files/legacy//planning/programs/transportation/pdf/pmpfv.pdf. Accessed: December 16, 2019.

———. 2003. *City of San Diego Trip Generation Manual*. May 2003.

———. 2013. *City of San Diego Bicycle Master Plan*. December. Prepared by Alta Planning & Design. Available: https://www.sandiego.gov/sites/default/files/legacy/planning/programs/transportation/mobility/pdf/bicycle_master_plan_final_dec_2013.pdf. Accessed: December 16, 2019.

———. 2017. *Transportation & Storm Water Design Manuals, Street Design Manual*. March. Available: https://www.sandiego.gov/sites/default/files/73_street_design_manual_march_2017-final.pdf. Accessed: December 16, 2019.

San Diego Association of Governments (SANDAG). 2010. *Riding to 2050, the San Diego Regional Bike Plan*. Available: https://www.sandag.org/uploads/projectid/projectid_353_10862.pdf. Accessed: December 16, 2019.

San Diego Unified School District (District). 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

State of California Governor's Office of Planning and Research (OPR). 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December. Available: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf. Accessed: December 16, 2019.

# 9.17 Section 4.14: Tribal Cultural Resources

San Diego Unified School District (District). 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

U.S. Department of the Interior, National Park Service. 1988. National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation*.

# 9.18 Section 4.15: Utilities and Service Systems

CalRecycle. 2017. *San Diego Jurisdiction Diversion/Disposal Rate Detail*. Available: https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionDetail?year=2017&jurisdictionID=433. Available: https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionDetail?year=2017&jurisdictionID=433. Accessed: September 19, 2019.

———. 2019. *Solid Waste Information System Facility/Site Listing*. Available: https://www2.calrecycle.ca.gov/swfacilities/Directory/37-AA-0020/Index. Accessed: September 19, 2019.

———. No Date. *Mandatory Commercial Recycling*. Available: https://www.calrecycle.ca.gov/recycle/commercial. Accessed: March 6, 2020.

City of San Diego Development Services Department (DSD). 2016. *California Environmental Quality Act Significance Determination Thresholds*. July. Available: https://www.sandiego.gov/sites/default/files/july_2016_ceqa_thresholds_final_0.pdf. Accessed: September 19, 2019.

City of San Diego Environmental Services Department (ESD). 2007. *Phase II: Long Term Resource Management Options Strategic Plan for the City of San Diego*. Available: https://www.sandiego.gov/sites/default/files/legacy/environmental-services/geninfo/pdf/LTRMOFinalReport.pdf. Accessed: September 19, 2019.

———. 2015. *City of San Diego Zero Waste Plan*. Available: https://www.sandiego.gov/sites/default/files/legacy/mayor/pdf/2015/ZeroWastePlan.pdf. Accessed: November 12, 2019.

———. 2019. *Miramar Landfill*. Available: https://www.sandiego.gov/environmental-services/miramar/. Accessed: September 19, 2019.

City of San Diego Public Utilities Department (PUD). 2004. *Sewer Design Guide*. Revised May, 2015. Available: https://www.sandiego.gov/sites/default/files/legacy/mwwd/pdf/sewerdesign.pdf.

———. 2016. *City of San Diego 2015 Urban Water Management Plan (UWMP).* Final. June. Available: https://www.sandiego.gov/sites/default/files/2015_uwmp_report.pdf. Accessed: September 19, 2019.

———. 2019. *Available*: https://www.sandiego.gov/public-utilities/sustainability/water-supply. Accessed: September 19, 2019.

Metro Wastewater Joint Powers Authority. 2019. *System Map.* Available: https://www.metrojpa.org/facilities/system-map. Accessed: September 19, 2019.San Diego Unified School District (District). 2016. *Standard Design Guide,* Section G2050, Landscaping.

San Diego Unified School District (District). 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

# 9.19 Section 4.16: Wildfire

Balch, J.K., B.A. Bradley, J.T. Abatzoglou, R. C. Nagy, E.J. Fusco, and A.L. Mahood. 2017. Human-Started Wildfires Expand the Fire Niche Across the United States. *Proceedings of the National Academy of Sciences*. 114(11):2946–2951.

Black, C., Y. Tesfaigzi, J.A. Bassein, and L.A. Miller. 2017. Wildfire Smoke Exposure and Human Health: Significant Gaps in Research for a Growing Public Health Issue. *Environmental Toxicology and Pharmacology* 55:186–195.

California Air Resources Board (CARB). 2018. *California Wildfire Emissions Estimates.* Available: https://ww2.arb.ca.gov/wildfire-emissions.

California Department of Education. 2019. *School Site Selection and Approval Guide*. Available: https://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp. Accessed: September 9, 2019.

California Department of Forestry and Fire Protection (CAL FIRE). 2007. *Fact Sheet: California's Fire Hazard Severity Zones*. Available: https://www.sccgov.org/sites/dpd/DocsForms/Documents/Fire_Hazard_Zone_Fact_Sheet.pdf.

———. 2016a. *Wildfire Activity Statistics.* Available: http://calfire.ca.gov/downloads/redbooks/2016_Redbook/2016_Redbook_FINAL.PDF.

———. 2016b. *Fire and Emergency Response.* Available: https://www.fire.ca.gov/media/4932/fireandemergencyresponse.pdf.

———. 2018a. *2018 Strategic Fire Plan for California*. Available: http://cdfdata.fire.ca.gov/fire_er/fpp_planning_cafireplan. Accessed: January 3, 2019.

———.2018b. *Emergency Fund Fire Suppression Expenditures.* Available: http://www.fire.ca.gov/fire_protection/downloads/SuppressionCostsOnepage.pdf.

City of San Diego. 2018. *General Plan.* Available: https://www.sandiego.gov/sites/default/files/pf_2018-_final.pdf.

———. 2019. *Fire-Rescue Department*. Available: https://www.sandiego.gov/fire/about.

County of San Diego. 2017. *Multi-Jurisdictional Hazard Mitigation Plan.* Available: https://www.sandiegocounty.gov/content/dam/sdc/oes/emergency_management/HazMit/2017/County-HazMit-Plan-2017-Sections-1-7-with-Appendixes-BOS-Approved.pdf.

Moench, R., and J. Fusaro. 2012. *Soil Erosion Control after Wildfire – 6.308.* Colorado State University Extension. Available: https://www.sublettewyo.com/DocumentCenter/View/1274/What-to-do-after-a-Wildfire?bidId=

Radeloff, V.C., D.P. Helmers, H.A. Kramer, M.H. Mockrin, P.M. Alexandre, A. Bar-Massada, V. Butsic, T.J. Hawbaker, S. Martinuzzi, A.D. Syphard, and S.I. Stewart. 2018. Rapid Growth of the U.S. Wildland-Urban Interface Raises Wildfire Risk. *Proceedings of the National Academy of Sciences*, 115(13):3314–3319.

San Diego Unified School District (District). 2019. Personal communication dated May 6, 2019 from Paul Garcia-Craivanu (District) to Tristan Evert (ICF): Re: Project Description.

Syphard A.D., V. C. Radeloff, J.E. Keeley, T. J. Hawbaker, M. K. Clayton, Sl. Stewart, and R. B. Hammer. 2007. Human Influence on California Fire Regimes. *Ecological Applications* 15(5):1388–1402. Available: https://doi.org/10.1890/06-1128.1.

U.S. Department of Agriculture and U.S. Department of the Interior (USDA and USDOI). 2001. Urban Wildland Interface Communities Within Vicinity of Federal Lands that Are at High Risk from Wildfire. *Federal Register* 66:751–777.

U.S. Department of Agriculture, Forest Service, Northern Research Station. 2019. *Northern Research Station News Releases: Most California Fires Occur in Area of Wildland-urban Interface with Less Fuel and More People.* Available: https://www.nrs.fs.fed.us/news/release/wui-interface-intermix. Accessed: March 18, 2021.

U.S. Environmental Protection Agency (EPA). 2018a. *Particulate Matter (PM) Pollution; Fires and Your Health*. Available: https://www.epa.gov/pm-pollution/fires-and-your-health.

———. 2018b. *Health Effects of Wildfire Smoke.* Available: https://www3.epa.gov/airnow/wildfire-smoke/wildfire-smoke-guide-revised-2019-chapters-1-3.pdf.

U.S. Geological Survey (USGS). 2018. *Post-Fire Flooding and Debris Flow*. Available: https://www.usgs.gov/centers/ca-water/science/post-fire-flooding-and-debris-flow?qt-science_center_objects=0#qt-science_center_objects.

Unified San Diego County Emergency Services Organization and County Of San Diego. 2018. *Operational Area Emergency Operations Plan*. Available: https://www.sandiegocounty.gov/content/dam/sdc/oes/emergency_management/plans/op-area-plan/2018/2018-EOP-Complete-Plan.pdf.

University of Wisconsin, Madison (UW 2008). Forest and Wildlife Ecology SILVIS LAB. Available: www.silvis.forest.wisc.edu/library/WUIDefinitions2.asp.

# 9.20 Chapter 5: Cumulative Impacts

Bay Area Air Quality Management District (BAAQMD). 2017. *California Environment Quality Act Air Quality Guidelines.* May. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.

California Air Resources Board (CARB). 2005. *Air Quality and Land Use Handbook: A Community Health Perspective.* April. Available: https://ww3.arb.ca.gov/ch/handbook.pdf. Accessed: August 21, 2019.

San Diego Association of Governments (SANDAG). 2013. *Series 13: 2050 Regional Growth Forecast.* October 15. Available: https://www.sandag.org/index.asp?classid=12&subclassid=84&projectid=503&fuseaction=projects.detail.

# 9.21 Chapter 6: Additional Considerations

California Department of Conservation. 2013. *San Diego County Williamson Act 2013/2014, Sheet 1 of 2.* 2014. Available: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/San_Diego_w_13_14_WA.pdf. Accessed: February 22, 2018.

———. 2016. *San Diego County Important Farmland 2016, Sheet 1 of 2.* Published May. Available: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/sdg16_w.pdf. Accessed: August 22, 2018.

City of San Diego. 2007. *Draft General Plan Final PEIR: Agricultural Resources*. Available: https://www.sandiego.gov/sites/default/files/legacy//planning/genplan/pdf/peir/3p1d1existingagric.pdf. Accessed: August 22, 2018.

———. 2008. *General Plan: Conservation Element*. Planning Department. Available: https://www.sandiego.gov/sites/default/files/legacy//planning/genplan/pdf/2012/ce120100.pdf. Accessed: February 16, 2018.

———. 2019. *Community Profiles*. Available: https://www.sandiego.gov/planning/community/profiles. Accessed: December 2, 2019.

County of San Diego. 2011. *General Plan Update: Mineral Resources.* Planning Department. Available: http://www.sandiegocounty.gov/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_2.10_-_Minerals_2011.pdf. Accessed: February 16, 2018.

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California Department of Education. 2020. *District Transfers.* Available: https://www.cde.ca.gov/re/di/fq/districttransfers.asp#:~:text=Each%20local%20district%20governing%20board%20has%20ultimate%20authority%20over,processes%20such%20as%20district%20transfers.&text=California%20law%20requires%20school%20districts,within%20the%20district's%20attendance%20area. Accessed: March 15, 2021.