September 2024 | Initial Study/Negative Declaration

EARLY CHILDHOOD EDUCATION CENTER & DISTRICT OFFICE RELOCATION PROJECT

Lemon Grove School District

Prepared for:

Lemon Grove School District
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PLACEWORKS

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Abbreviations and Acronyms

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

Abbreviations and Acronyms

CO	carbon monoxide
CO_2e	carbon dioxide equivalent
Corps	US Army Corps of Engineers
CSO	combined sewer overflows
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gases
GWP	global warming potential
HCM	Highway Capacity Manual
HQTA	high quality transit area
HVAC	heating, ventilating, and air conditioning system
IPCC	Intergovernmental Panel on Climate Change
L_{dn}	day-night noise level
L_{eq}	equivalent continuous noise level
LBP	lead-based paint
LCFS	low-carbon fuel standard
LOS	level of service
LST	localized significance thresholds
M_W	moment magnitude
MCL	maximum contaminant level
MEP	maximum extent practicable
mgd	million gallons per day
MMT	million metric tons

Abbreviations and Acronyms

MPO	metropolitan planning organization
MT	metric ton
NAHC	Native American Heritage Commission
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O_3	ozone
OES	California Office of Emergency Services
PM	particulate matter
POTW	publicly owned treatment works
ppm	parts per million
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMP	risk management plan
RMS	root mean square
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SIP	state implementation plan
SLM	sound level meter
SoCAB	South Coast Air Basin
SO_X	sulfur oxides
SQMP	stormwater quality management plan
SRA	source receptor area [or state responsibility area]
SUSMP	standard urban stormwater mitigation plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TNM	transportation noise model
tpd	tons per day
TRI	toxic release inventory
TTCP	traditional tribal cultural places

Abbreviations and Acronyms

USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WSA	water supply assessment

Abbreviations and Acronyms

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1. Introduction

The Lemon Grove School District (District) converted the existing school at 8425 Palm Street, in the City of Lemon Grove, San Diego County, into a District Office and developed a new campus for the Early Childhood Education Center (ECEC) on the western portion of the site.

The ECEC would accommodate capacity for 400 pre-kindergarten (PK), transitional kindergarten (TK), full-day kindergarten (FDK) students with 16 classrooms, 50 staff, and includes administration space, multipurpose room (MPR), library, solar, and play areas. The parking and drop-off areas are in the northwest portion of the project site and utilize the access points from Palm Street.

The campus was previously home to Palm Middle School and subsequently leased to Liberty Charter School under a Proposition 39 agreement. The charter school vacated the site when the lease ended, and the District is now housing its TK program in the buildings on the eastern portion of the site. The TK program would move to the new ECEC, and the District would reuse the buildings on the eastern portion of the site for District Office, special education, transitional education and independent studies, or virtual learning; the capacity of the special education program would be 75 students and 70 staff (administrative and teachers). The buildings on the eastern portion are currently being used by three District departments.

The proposed project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). As the lead agency with the principal responsibility for carrying out and approving the project, the District is required to consider the proposed project's potential environmental consequences and determine if its benefits outweigh any significant effects. This document is an "initial study" of the effects.

1.1 PROJECT LOCATION

The project site is 18.01 acres, and the Assessor's Parcel Number (APN) is 503-320-1400. The project site is bound by Palm Street and single-family residences to the north, single-family residences and Mt. Vernon Elementary School to the west, and single-family residences to the east and south. To the northeast of the project site is a currently vacant site that has been approved for an affordable housing project.

The City of Lemon Grove is bound by unincorporated San Diego County to the east and southeast, the City of La Mesa to the north, and the City of San Diego to the west and south. The project site is approximately 600 feet west from State Route 125 (SR-125). Figure 1, *Regional Location,* and Figure 2, *Local Vicinity,* show the project site in its regional and local contexts.

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing Land Use

Facilities

The project site was previously Palm Middle School until 2000, and then leased to Liberty Charter School, which housed approximately 400 students and 50-60 staff; the charter school closed in 2022.

The western portion of the site includes the ECEC, and the eastern portion of the site includes the former middle school buildings (permanent and portable buildings) that have been converted to a District Office, and a courtyard.

Access and Circulation

Ingress into the parking area at the northwestern portion of the site is at the signalized intersection of Palm Street and Golden Avenue. This driveway provides access to:

- The ECEC parking lot with one-way circulation to the student drop-off areas, a bus drop-off area, and 55 parking spaces (51 standard spaces, two ADA spaces, and two van spaces).
- 21 parking spaces (19 standard spaces and two ADA spaces) at the northern portion of the site, directly south of Palm Street.
- A parking lot at the northeastern portion of the parking lot that can accommodate 52 parking spaces (50 standard spaces, two ADA spaces).

Egress occurs via two lanes (one right-turn only and one left-turn only) at the northeastern portion of the site, at a signalized intersection at Palm Street and the campus driveway.

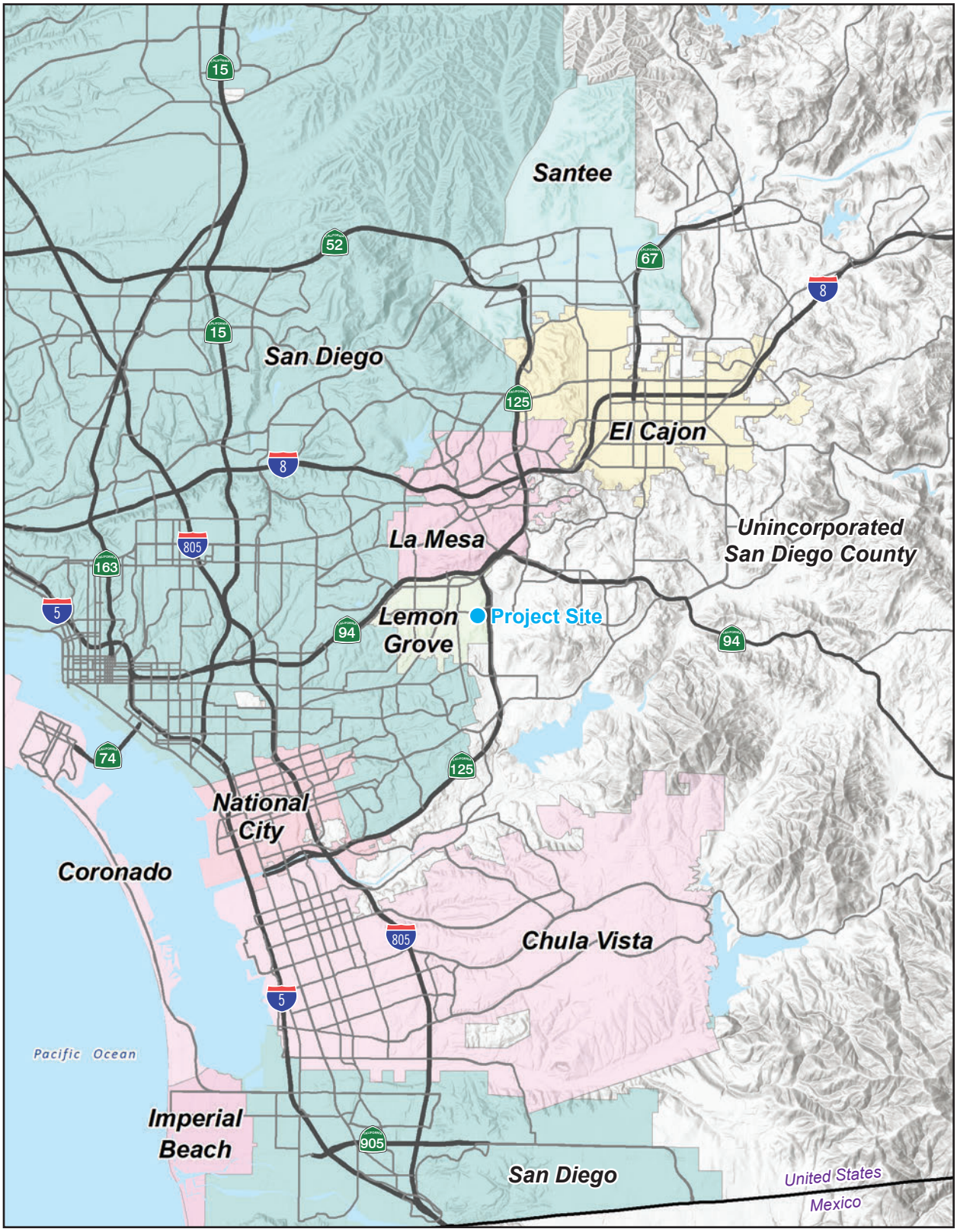
Emergency access to the site is via the cul-de-sac on Palm Street, off of Camino de Las Palmas, at the northeastern portion of the site. Additionally, a fire lane loop extends around the buildings in the ECEC portion of the project site.

1.2.2 Surrounding Land Uses

The project site is in a residential community with primarily single-family residences. The project site is surrounded by the land uses described below.

- **North:** Palm Street and single-family residences.
- **East:** Single-family residences.
- **South:** Single-family residences.
- **West:** Mt. Vernon Elementary School and single-family residences.

Figure 1 - Regional Location



Note: Unincorporated county areas are shown in white.
Source: Generated using ArcMap, 2023.

0 3
Scale (Miles)

1. Introduction

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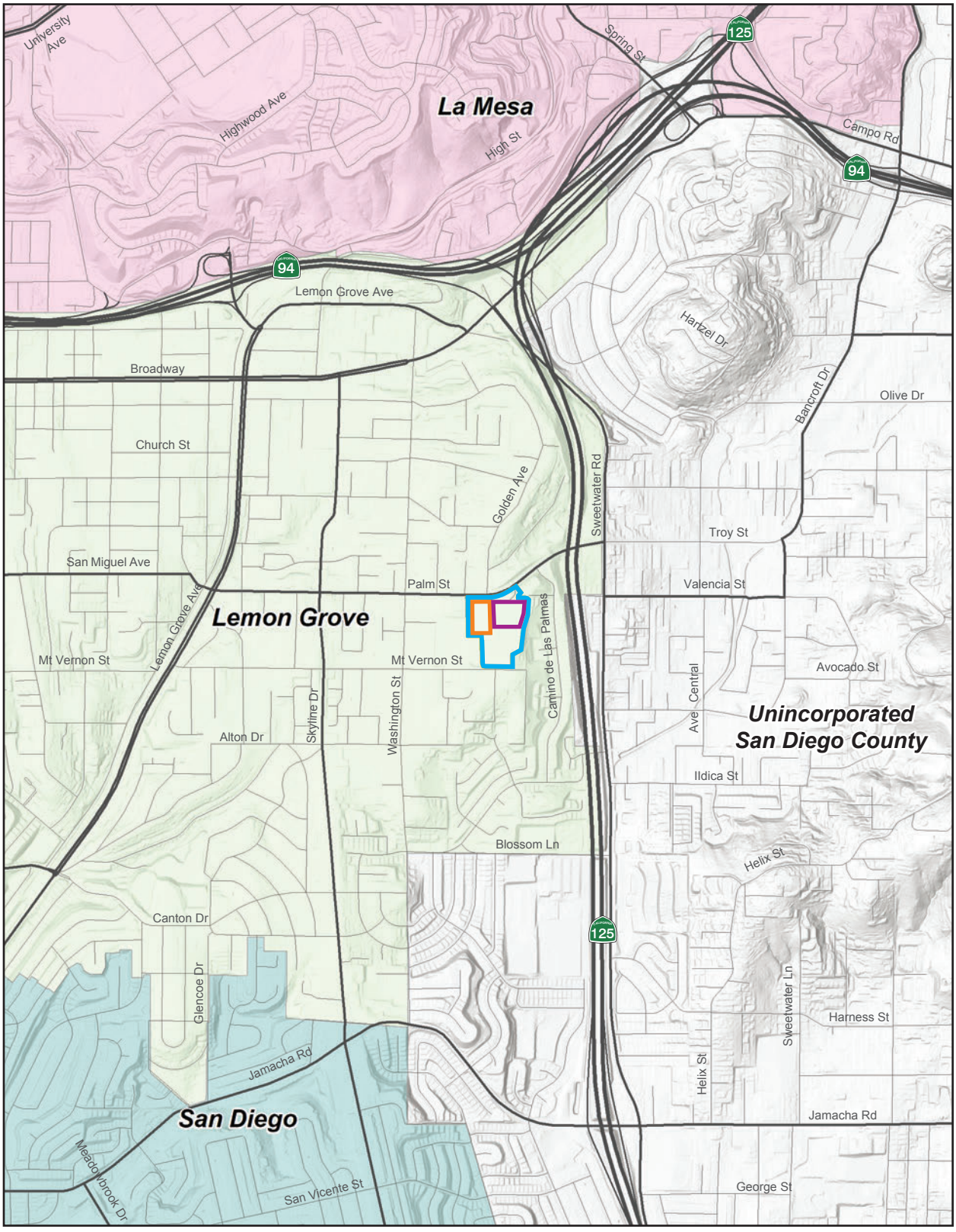
Figure 2 - Local Vicinity



Note: Unincorporated county areas are shown in white.
Source: Generated using ArcMap, 2023.

1. Introduction

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1.3 EXISTING ZONING AND GENERAL PLAN

The City of Lemon Grove General Plan Land Use Designation for the project site is School/Institutional and the zoning designation is Residential Low Medium (RLM). According to Section 17.16.020, Residential Low/Medium Density (RLM) Zone, a Conditional Use Permit is required for schools within this zone. As the project site was formerly used as a school, the District would not need to apply for a Conditional Use Permit. Additionally, the District may exempt the site from local zoning under its authority, pursuant to Government Code 53094.

The properties to the east of the site have a land use designation of Low Medium Density Residential and Parks/Recreational, the properties to the south of the site are designated Low Medium Density Residential, the properties to the west are designated School/Institutional and Low Medium Density Residential, the properties to the north are designated Low Medium Density Residential, and the property to the northeast is designated STA VII (Troy Street/SR-125 Planning Area). The properties to the north, south, east, and west are zoned Residential Low Medium (RLM). The property to the northeast is zoned STA VII (Troy Street/SR-125 Planning Area).

1.4 DISTRICT ACTION REQUESTED

The Initial Study/Negative Declaration examines the potential environmental impacts of the proposed Early Childhood Education Center & District Office Relocation Project (proposed project). This Initial Study/Negative Declaration is also being prepared to address various actions by the District to adopt and implement the proposed project. It is the intent of this Initial Study/Negative Declaration to enable the District to make an informed decision with respect to the proposed project. The District is required to approve the Initial Study/Negative Declaration prior to approving the proposed project.

The District plans to seek matching State funds, which will trigger the need for California Department of Education (CDE) and Department of Toxic Substances Control (DTSC) approvals, and compliance with Title 5 which will require the preparation of a Geological and Environmental Hazards Assessment (GEHA), in addition to the CEQA process.

The District submitted plans to California Division of the State Architect (DSA) in July 2023 and received approval on December 2023.

Figure 3, *Early Childhood Education Center Site Plan,* shows the location of the ECEC buildings on the western portion of the project site.

1.5 PROJECT DESCRIPTION

1.5.1 Proposed Land Use

The District converted the existing school at 8425 Palm Street, in the City of Lemon Grove, into a District Office and developed a new campus for the Early Childhood Education Center (ECEC) on the western portion

of the site. The proposed project is expected to be operational in January 2025. The proposed project would relocate students and staff from other campuses within the District to the project site.

District Office and Special Education Program

Currently, three District departments operate in the buildings located on the eastern portion of the project site. Upon the Governing Board's approval, the remaining District departments would be relocated to the existing campus. The TK program is currently housed in these buildings and would be relocated to the ECEC upon project operations.

The special education program, which includes transitional education, independent studies, and virtual learning, would be housed within the District Office buildings to create a centralized location which would provide enhanced learning and resources for the special education program. The special education program would have 75 students, and 70 staff and teachers on the project site. Existing staff from other offices in the District would be relocated to the District Office on the project site over the course of five years.

Landscaping

Landscaped lawn areas interspersed with trees currently exists between the buildings at the District Office site. The proposed project would not change landscaping at the District Office site.

Outdoor Spaces

Outdoor spaces consist of hardscaped play areas south of the buildings on the eastern portion of the site. There are also covered concreate walkways connecting the buildings and a concrete seating area between the buildings. The proposed project would not make changes to these facilities.

Early Childhood Education Center

The District plans to operate an ECEC on the western portion of the project site. As shown in Figure 3, *Early Childhood Education Center Conceptual Site Plan,* the administrative building, library building and multipurpose room are in the center of the ECEC site, surrounded by playground facilities and eight classroom buildings. The ECEC facilities are proposed to accommodate 400 students and 50 staff. The ECEC buildings are all-electric and include solar, EV charging stations, and comply with Title 24 Energy Efficiency requirements.

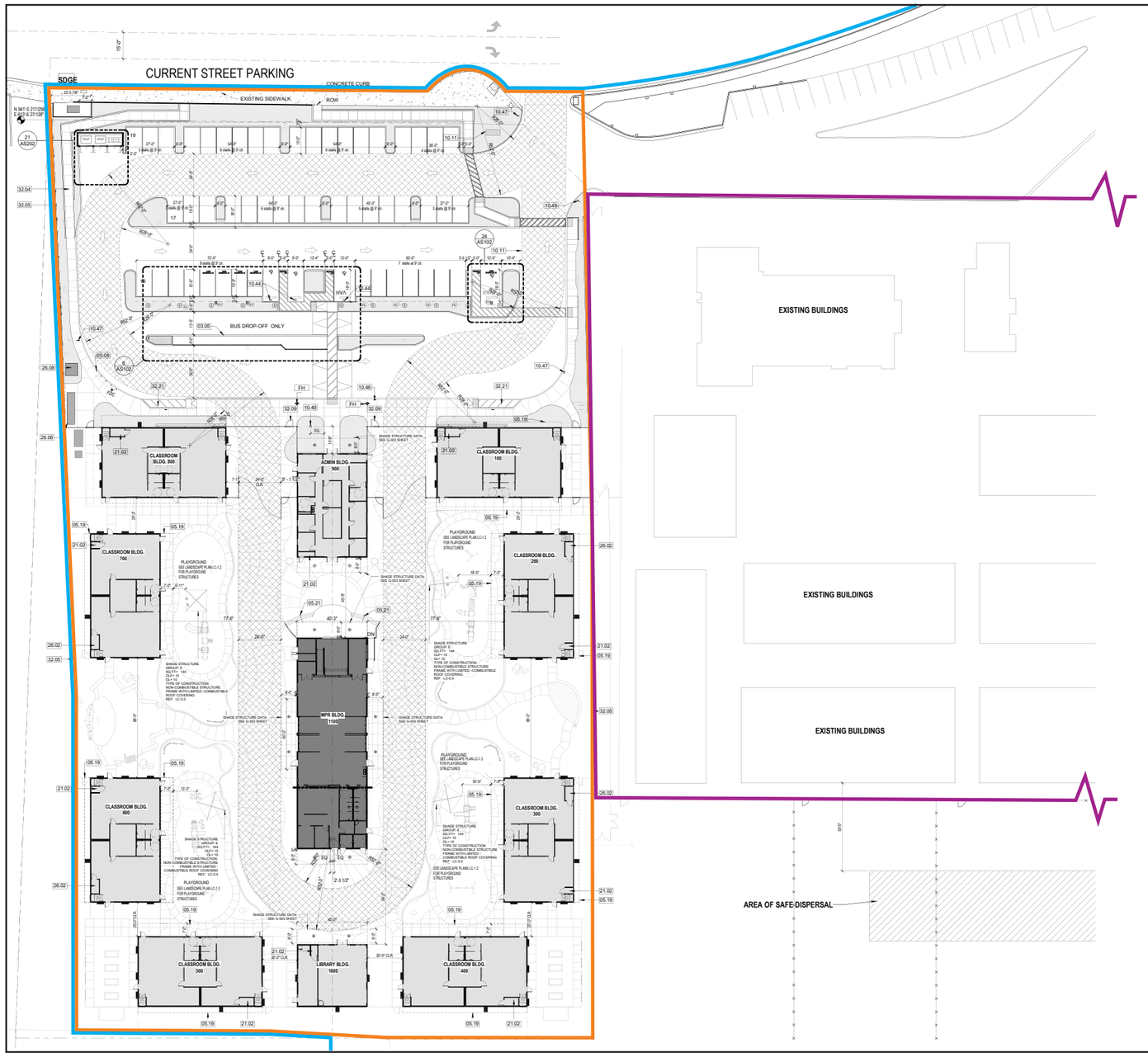
Facilities

The proposed multipurpose room building would be 20 feet and 6 inches at its highest point, the library building is approximately 1,310 square feet, the administration building is approximately 1,770 square feet, and each classroom building would be approximately 2,570 square feet. The building exterior includes cement plaster and siding.

Landscaping

The parking lot north of the ECEC buildings includes ornamental landscaping, such as bushes, trees, shrubs, and grasses. The landscaping has been added to serve as a buffer from the parking lot and the sidewalk on Palm Street.

Figure 3 - Early Childhood Education Center Site Plan



KEYNOTE LEGEND

NUMBER	DESCRIPTION
03.05	6" CONCRETE CURB, REFER TO CIVIL PLAN C2.0
05.08	FIXED PIPE BOLLARD, SEE CIVIL DETAIL WM-04/C2.01
05.19	MODULAR BUILDING CANOPY, REFER TO AMS PLANS
05.21	HANDRAIL AT CONCRETE STAIRS REFER TO LANDSCAPE DETAIL 2/LC-2.1
10.11	BUILDING INDENTIFICATION SIGN
10.40	FLAGPOLE, SEE DTL 30/AS201
10.44	ACCESSIBLE PARKING SIGN, SEE DLT 25/AS201
10.46	IMMEDIATE PICK UP & DROP OFF SIGN, SEE DLT 23/AS201
10.47	TOW SIGN, SEE DLT 27/AS201
10.49	STOP SIGN, SEE DTL 12/AS201
21.02	FIRE RISER ROOM
26.02	IDF ROOM LOCATION
26.06	MAIN SWITCHBOARD
26.08	SDG&E TRANSFORMER
32.04	SIDE WALK, REFER TO CIVIL AND LANDSCAPE PLANS
32.05	CHAIN LINK FENCE, REFER TO LANDSCAPE PLANS AND DTLS
32.09	METAL FENCE GATE, REFER TO LANDSCAPE PLANS
32.21	ACCESSIBLE DROP-OFF, SEE DTL 18/AS201 AND 23/AS201

SITE PLAN NOTES

1. ALL ITEMS ARE NEW UNLESS NOTED AS EXISTING (E).
2. REFER TO CIVIL DOCUMENTS
3. COORD. ALL SPOT ELEVATIONS AND DIMENSIONS WITH CIVIL, LANDSCAPE, AND OR STRUCTURAL DOCUMENTS
4. PROVIDE AND INSTALL POSITIVE DRAINAGE AWAY FROM ALL BUILDINGS OF 1 % MINIMUM, 2 % MAXIMUM AT ALL EXTERIOR PAVED PEDESTRIAN AREAS, INCLUDING BUT NOT LIMITED TO, SIDEWALKS, PATIOS, STAIRS, PAVING, U.N.O.
5. PROVIDE AND INSTALL POSITIVE DRAINAGE AWAY FROM ALL BUILDINGS OF 5 % FOR A HORIZ. DISTANCE OF 10 FEET AT ALL EXTERIOR NON-PAVED AREAS U.N.O
6. REFER TO CIVIL DOCUMENTS FOR CONCRETE SIDEWALK EXPANSION JOINTS AND CONCRETE SIDEWALK CONTROL JOINTS
7. VERIFY AND CONFIRM ALL JOINT LAYOUTS AT ALL CONCRETE SIDEWALKS WITH ARCH. PRIOR TO POURING OF CONCRETE
8. PROVIDE AND INSTALL CONCRETE SIDEWALK EXPANSION JOINTS AT AREAS NOT SPECIFICALLY INDICATED AT 50 FEET ON-CENTER MAX. U.N.O.
9. PROVIDE AND INSTALL CONCRETE SIDEWALK CONTROL JOINTS AT AREAS NOT SPECIFICALLY INDICATED AT DISTANCES EQUIVALENT TO SIDEWALK WIDTH, BUT NOT TO EXCEED 10 FEET ON-CENTER MAX.
10. VERIFY ALL SITE SIGNAGE LOCATIONS WITH ARCH. PRIOR TO INSTALLATION OF SITE SIGNAGE
11. CONTRACTOR TO PROTECT ALL EXISTING LANDSCAPING DURING CONSTRUCTION
12. ALL NON ACCESSIBLE PARKING SPACES ARE 9 FEET WIDE X 18 FEET LONG CENTER TO CENTER U.N.O.

PLAN LEGEND

- AC PAVING - SEE CIVIL DRAWINGS
- CONCRETE PAVING - SEE CIVIL DRAWINGS
- LANDSCAPING - SEE LANDSCAPE DRAWINGS
- NEW FIRE LANE
- MODULAR BUILDINGS
- GROUND-UP BUILDING
- FH — FIRE HYDRANT, SEE CIVIL PLANS
- FDC — FIRE DEPARTMENT CONNECTION, SEE CIVIL PLANS
- EV — PROVIDED ELECTRIC VEHICLE CHARGING STATION, SEE ELEC. PLANS
- FE — CAPABLE FUTURE ELECTRIC VEHICLE CHARGING STATION, SEE ELEC. PLANS
- LIGHT POLE, SEE ELECTRICAL PLANS

SHADE STRUCTURE

A. GROUP: E

B. TYPE CONSTRUCTION: NON-COMBUSTIBLE STRUCTURAL FRAME WITH NON-COMBUSTIBLE ROOF COVERING

C. RISK CATEGORY: I

E. MAXIMUM OCCUPANCY: 20 PER 15x20 SHADE STRUCTURE

F. SHADE STRUCTURE LOCATION IS CAPABLE OF HEARING CAMPUS FIRE ALARM SIGNAL

G. AUTOMATIC FIRE SPRINKLERS NOT REQUIRED.

Project Site
Early Childhood Education Center
District Office

0 — 70
Scale (Feet)

Source: PBK 2023.

1. Introduction

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Outdoor Spaces

The ECEC includes four distinct playground areas with elevated shade structures and organic pathways connecting them, as well as two additional outdoor learning areas centralized on the outer perimeter.

Fencing

The entire site is fenced; in areas where buildings do not create an enclosed area, an eight-foot fence has been installed. Fencing along the northern portion of the site is ornamental, and fencing on the eastern, western, and southern portions of the site are chain-link. Required four-foot fencing per Title 5 and Title 22 encloses the playground areas.

Access and Circulation

District Office and Special Education Program

As stated in Section 1.2.1, *Existing Land Use,* above, ingress into the parking area at the northeastern portion of the site is at the signalized intersection of Palm Street and Golden Avenue. Once the proposed project is operational, this driveway would continue to provide access to two drop-off lanes. The number of parking spaces onsite would remain unchanged—21 parking spaces at the northern portion of the site and the northeastern parking lot with 52 parking spaces.

Egress would continue to be provided via two lanes (one right-turn only and one left-turn only) at the northeastern portion of the site, at a signalized intersection at Palm Street and the campus driveway. Emergency access to the site is via the cul-de-sac on Palm Street, off of Camino de Las Palmas, at the northeastern portion of the site.

Early Childhood Education Center

The proposed project would maintain ingress and egress via Palm Street; the project site driveways would not need to be relocated. The ECEC includes a parking lot at the northwestern portion of the project site. The parking lot utilizes the driveway off of Palm Street, and has 55 parking spaces. The flow of the traffic in the parking lot would be counterclockwise. The southern portion of the parking lot includes a bus only lane. A crosswalk would allow access to and from the parking lot. Access into and out of this parking lot would be at the northeastern portion of the parking lot. Additionally, a fire lane loop extends around the buildings in the ECEC portion of the project site.

Lighting

District Office and Special Education Program

The buildings on the eastern portion of the site have exterior and security lighting. Upon project completion, lighting would remain unchanged at this portion of the site.

Early Childhood Education Center

The ECEC would include exterior and security lighting.

1. Introduction

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2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** Early Childhood Education Center and District Office Relocation Project

2. **Lead Agency Name and Address:**
Lemon Grove School District
8025 Lincoln Street
Lemon Grove, CA 91945

3. **Contact Person and Phone Number:**
Tiana Barton, Chief Business Official
619.825.5600

4. **Project Location:**
The project site is 18.01 acres, and the Assessor's Parcel Number (APN) is 503-320-1400. The project site is bound by Palm Street and single-family residences to the north, single-family residences and Mt. Vernon Elementary School to the west, and single-family residences to the east and south. To the northeast of the project site is a currently vacant site that has been approved for an affordable housing project.

5. **Project Sponsor's Name and Address:**
Lemon Grove School District
8025 Lincoln Street
Lemon Grove, CA 91945

6. **General Plan Designation:** School/Institutional

7. **Zoning:** Residential Low Medium (RLM)

8. **Description of Project:**
The District converted the existing school at 8425 Palm Street, in the City of Lemon Grove, into a District Office and developed a new campus for the Early Childhood Education Center (ECEC) on the western portion of the site. The special education program would have 75 students and 70 staff/teachers, and the ECEC would accommodate 400 students and 50 staff.

9. **Surrounding Land Uses and Setting:**
The project site is in a residential community with primarily single-family residences. The project site is surrounded by single-family residences to the north, south, east, and west, and Mt. Vernon Elementary School to the west.

2. Environmental Checklist

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

- California Department of Education, School Facilities Planning Division (CDE)
- California Department of General Services, Division of State Architect (DSA)

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3I contains provisions specific to confidentiality.

The District has not received notification from California Native American tribes per Public Resources Code Section 21080.3.1, and therefore, the provisions for consultation have not been triggered.

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

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

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Tiana Barton — 9/6/2024

Signature — *Date*

Tiana Barton — 9/6/2024

Printed Name — *Date*

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

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

   a) **Earlier Analyses Used.** Identify and state where they are available for review.

   b) I**mpacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) **Mitigation Measures.** For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

2. Environmental Checklist

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3. Environmental Analysis

This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if applicable.

3.1 AESTHETICS

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

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

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

Less Than Significant Impact. A scenic vista is a viewpoint that provides expansive views of a highly valued landscape for the benefit of the public. The City's General Plan does not identify any scenic vistas in the City (Lemon Grove 1996). The project site is surrounded by residential uses. Mountain ridgelines exist to the east of the site; however, views of these mountains are partially obstructed by fencing, trees, powerlines, and development. The project site is developed with the ECEC and District Office, as well as landscaping, fencing, parking, and solar panels. Given the developed nature of the project site and surroundings, the proposed project would not obstruct or alter scenic resources. Impacts would be less than significant.

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

No Impact. The closest designated state scenic highway is State Route 125 (SR-125), approximately 1.65 miles northeast of the project site in the City of La Mesa (Caltrans 2019). The closest eligible state scenic highway is

SR-94 approximately 1.45 miles northeast of the project site in the City of La Mesa (Caltrans 2019). Due to the distance, topography, and intervening structures, the proposed project would not result in impacts to scenic resources within a designated state scenic highway. Therefore, no impact would occur.

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

Less Than Significant Impact. The project site is in a fully urbanized area with development surrounding the site in all directions. The project site has been converted to a District Office and ECEC. The project site was formerly used as a school, and would continue to operate educational and school administrative services onsite. Therefore, the proposed project is consistent with the RLM zone which conditionally allows schools within this zone. There are no scenic resources visible from the perimeter of the campus. The proposed project would not adversely affect scenic views. The project site is within a residential neighborhood.

The buildings onsite are compatible with the existing development in the project area and the character of the surrounding area. The proposed project includes landscaping and building exterior finishes that complement the surrounding structures. The District constructed the ECEC on the western portion of the site and the buildings on the eastern portion of the site were converted to the District Office. Therefore, the buildings onsite do not substantially degrade the visual character and quality of the project site and surrounding area. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the intended area to be lit. Glare occurs when a bright object is against a dark background, such as oncoming vehicle headlights or an unshielded light bulb. The project site currently generates light from its buildings (interior and exterior) and parking lots. Vehicle headlights, streetlights, and exterior and interior building lights also exist in the surrounding area.

Lighting on the eastern portion of the site has remained unchanged and includes exterior and security lighting. Lighting at the ECEC (western portion of the site) includes building and security lighting. Lighting would be directed onto the intended area to be lit and would not spill off the campus. Light and glare levels caused by the proposed project would not substantially create new sources of light and glare that would adversely affect day or nighttime views. Therefore, light and glare impacts would be less than significant.

3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects,

lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The project site has no agricultural or farm uses on it, nor are there agricultural or farm uses in its immediate proximity. No project-related farmland conversion impact would occur. The project site is fully developed and is not mapped as important farmland by the California Important Farmland Finder; the site is mapped as "Urban and Built-Up Land" (DOC 2024a). No impact would occur.

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

No Impact. The zoning designation for the project site is Residential Low Medium (RLM). The proposed project would not conflict with agricultural zoning or a Williamson Act contract as it is not zoned for agricultural use. Williamson Act contracts restrict the use of privately-owned land to agriculture and compatible

open space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no Williamson Act contract in effect onsite (DOC 2024b). No impact would occur.

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

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

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

No Impact. Vegetation onsite is limited to scattered ornamental trees, shrubs, bushes and ground cover. The proposed project would not result in the loss or conversion of forest land. No impact would occur.

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

No Impact. The California Important Farmland Finder indicates that there is no important farmland or forest land on the project site or within the surrounding vicinity. The project site and surroundings are mapped "Urban and Built-Up" (DOC 2024a). The proposed project would not indirectly cause conversion of such land to nonagricultural or non-forest use. No impact would occur.

3.3 AIR QUALITY

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

- *Air Quality and Greenhouse Gas Emissions Analysis,* PlaceWorks, August 2024

A complete copy of the report is included as Appendix A to this Initial Study.

The Air Quality section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthy pollutant concentrations.

Air Pollutants of Concern

Criteria Air Pollutants

Pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and State law under the National and California Clean Air Act, respectively. Air pollutants are categorized as primary and/or secondary pollutants. Primary air pollutants are those that are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxides (NO_X), sulfur dioxide (SO_2), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), and lead (Pb) are primary air pollutants. Of these, all of them except for ROGs are "criteria air pollutants," which means that ambient air quality standards (AAQS) have been established for them. The National and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect those "sensitive receptors" most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The San Diego Air Basin (SDAB), which is managed by the San Diego Air Pollution Control District (SDAPCD), is designated as a non-attainment area for California and National O_3, and California $PM_{2.5}$ and PM_{10} AAQS (SDAPCD 2024). SDAPCD has identified screening level thresholds for criteria pollutant emissions and criteria air pollutant precursors, including VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. Development projects below the SDAPCD's screening level thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard, contribute substantially to an existing or projected air quality violation, or substantially contribute to health impacts.

Toxic Air Contaminants

In addition to criteria air pollutants, both the State and federal government regulate the release of TACs. The California Health and Safety Code define a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal Clean Air Act (42 United States Code Section 7412[b]) is a toxic air contaminant. Under State law, the California Environmental Protection Agency, acting through the California Air Resources Board (CARB), is authorized to identify a substance as a TAC if it determines that the substance is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or may pose a present or potential hazard to human health. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:

3. Environmental Analysis

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

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

Less Than Significant Impact. A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the San Diego Regional Air Quality Strategy and applicable portions of the State Implementation Plan. The proposed project involves the operation of a new campus for the ECEC on the western portion of the project site, and the District Office, special education program, transitional education and independent studies, or virtual learning on the eastern portion of the project site. The ECEC would accommodate 400 students and 50 staff and the special education program would have 75 students and 70 staff/teachers. All students and staff that would be accommodated at the ECEC and District Office are existing elsewhere in the District and are being relocated to the improved facilities on the project site. The proposed project would not introduce new population growth and therefore would not conflict with the growth projections accounted for by San Diego Association of Governments (SANDAG), which is utilized by SDAPCD in their Regional Air Quality Strategy (RAQS) and forecasting SDAB's attainment of California and National AAQS. As SDAB is in non-attainment for ozone and particulate matter AAQS, the RAQS contemplates regional strategies and emissions forecasts focusing on those pollutants, which is typically aligned with demographic growth projections for the region. The RAQS relies on population and projected growth in the county and projected future mobile, area, and stationary source emissions. Based on these emissions, the RAQS determines the strategies necessary for the reduction of stationary source emissions through regulatory controls. Mobile source emission projections and growth projections are based on population and vehicle trends and land use plans developed by the cities and San Diego County in SDAB. As such, projects that are consistent with the growth anticipated in the respective jurisdiction's General Plans would be considered consistent with the RAQS. Because the proposed project would be relocating existing staff and students from elsewhere in the District and would not result in any population growth, the proposed project would be consistent with the growth projections of SDAPCD's RAQS and ozone precursor and particulate matter emissions generated by operation of the proposed project are therefore accounted for in SDAPCD's RAQS. As such, the proposed project would not conflict or obstruct implementation of SDAPCD's applicable air quality plans, and this impact would be less than significant.

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

Less Than Significant Impact. As previously discussed, SDAB is presently designated non-attainment for ozone California and National AAQS. Ozone is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. SDAB is also designated non-attainment for California and National PM_{10} and $PM_{2.5}$ AAQS. Sources of PM_{10} and $PM_{2.5}$ in both urban and rural areas include motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands. Criteria air pollutant emissions associated with the proposed project include emissions from operation of the new ECEC facility. As discussed in Section 1.5, *Project Description*, the District Office currently accommodates three District departments and TK program, and the proposed project would relocate the remaining District departments to this facility and the TK program would move to the ECEC along with other programs from elsewhere in the District. As such, under the proposed project, the District Office would not produce new criteria air pollutants during operation as the building would continue to operate in a similar capacity. San Diego County has established air quality screening level thresholds to be used as numeric methods to demonstrate that a project's total emissions (e.g., stationary, fugitive dust, mobile emissions) would not result in a significant impact to air quality or conflict with SDAPCD's efforts to comply with National and California AAQS. Table 1, *San Diego County Air Quality Significance Thresholds*, provides the San Diego County's screening thresholds that would apply to the proposed project, which are recommended for use by SDAPCD.

Table 1 San Diego County Air Quality Significance Thresholds

Pollutant	Pounds Per Day	Tons Per Year
PM_{10}	100	15
$PM_{2.5}$	55*	10*
NO_X	250	40
SO_X	250	40
CO	550	100
VOCs	75**	13.7***

Source: San Diego County 2007.
Notes:
* EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the SCAQMD.
** Threshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.
*** 13.7 Tons Per Year threshold based on 75 lbs/day multiplied by 365 days/year and divided by 2000 lbs/ton.

The proposed project involves the operation of a new campus for the ECEC on the western portion of the project site. All students and staff that would be hosted at the ECEC are existing elsewhere in the District and are being relocated to the improved facilities on the project site. Therefore, this analysis does not include mobile source emissions because vehicle trips associated with the proposed project already exist elsewhere in the District and would not increase as a result of the proposed project. Moreover, as previously discussed, the District Office currently accommodates three District departments and the TK program, and the proposed project would relocate the remaining District departments to this facility and the TK program would move to the ECEC along with other programs from elsewhere in the District. Therefore, because the District Office

3. Environmental Analysis

would continue operating in a similar capacity under the proposed project, emissions associated with the District Office are not included in this analysis. An estimate of net criteria air pollutant emissions from operation of the new buildings (i.e., area and energy source emissions from the ECEC) is provided in Table 2, *Daily and Annual Operational Project Emissions*.

Table 2 Daily and Annual Net Operational Project Emissions

Sources	Net Operation-Related Regional Emissions					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Proposed Project – Maximum Daily Emissions (lbs/day)						
Area	1	<1	1	<1	<1	<1
Energy (Natural Gas)	-	-	-	-	-	-
Total Net Increase	1	<1	1	<1	<1	<1
Significance Thresholds	75	250	550	250	100	55
Exceed Threshold?	No	No	No	No	No	No
Proposed Project – Annual Emissions (tons/year)						
Area	<1	<1	<1	<1	<1	<1
Energy (Natural Gas)	-	-	-	-	-	-
Total Net Increase	<1	<1	<1	<1	<1	<1
Significance Thresholds	13.7	40	100	40	15	10
Exceed Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1; PlaceWorks 2024a (see Appendix A).

As shown in Table 2, future net new operation-related air emissions would not exceed SDAPCD's screening level thresholds identified in Table 1. Therefore, the proposed project would not result in a substantial increase in emissions such that criteria pollutant air quality standards would be violated, and this impact would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO, called hotspots. These pockets have the potential to exceed the State 1-hour standard of 20 ppm or the 8-hour standard of 9.0 ppm. Since CO is produced in the greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds.

CO emissions are the result of the combustion process and therefore primarily associated with mobile source emissions (vehicles). CO concentrations tend to be higher in urban areas where there are many mobile-source emissions. CO "hotspots" or pockets where the CO concentration exceeds the NAAQS and/or CAAQS, have been found to occur only at signalized intersections that operate at or below level of service (LOS) E with

peak-hour trips for that intersection exceeding 3,000 trips (San Diego County 2007). Therefore, projects that will cause road intersections to operate at or below a LOS E (with intersection peak-hour trips exceeding 3,000) will also have to conduct a CO hotspot analysis. Projects that would not cause road intersections to operate at or below LOS E and see over 3,000 peak-hour vehicle trips would therefore not result in the potential to cause a CO hotspot.

According to the Traffic Impact Analysis (TIA) prepared by Garland Associates (2024), the with project conditions show that the Palm Street and Washington Street intersection would experience an LOS deterioration from LOS B to LOS D; however, Figure 8 of the TIA (Appendix C) identifies that under the with project conditions, the intersection of Palm Street and Washington Street would see an estimated 1,326 peak-hour vehicle trips. As such, the proposed project would not have the potential to cause a CO hotspot, and this impact would be less than significant.

Health Risk

Operation Phase Community Risk and Hazards

The purpose of this environmental evaluation is to identify the significant effects of the proposed project on the environment, not the significant effects of the environment on the proposed project (*California Building Industry Association v. Bay Area Air Quality Management District [2015] 62 Cal.4th 369 [Case No. S213478]*). Schools, residential, commercial, and office uses are not land use types that use materials or equipment that generate substantial quantities of TACs and typically do not exacerbate existing hazards, so these thresholds are typically applied to new industrial projects. Therefore, operation of the proposed project would not result in exposing sensitive receptors to substantial pollutant concentrations that could result in a potentially significant health impact, and this impact would be less than significant.

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

Less Than Significant Impact. The project site would continue to operate school and administrative uses. Therefore, the proposed project would not result in a change in land use that would generate odors, and no objectionable odors are anticipated to result from the operational activity of the proposed project. The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed project does not fit into these types of facilities and would not generate objectionable odors that would lead to a public nuisance. As such, this impact would be less than significant.

3.4 BIOLOGICAL RESOURCES

Would the project:

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

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. The project site is currently developed with a former school that has been converted into a District office and the ECEC buildings and is within an urbanized portion of the City. The project site is surrounded by residential uses. Given that the project site and surrounding area are developed and disturbed by human activities, it is unlikely that there are sensitive animal species onsite. Therefore, impacts would be less than significant.

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

No Impact. The project site is developed with a former school that has been converted into a District Office and the ECEC buildings. No riparian habitats are identified onsite (USFWS 2024). As such, no impacts would occur.

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

No Impact. The project site is currently developed with a former school that has been converted into a District Office and the ECEC buildings. No wetland or drainage areas are identified on the project site (USFWS 2024). Therefore, no impacts would occur to wetlands or drainage areas.

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

No Impact. Wildlife movement corridors facilitate movement of species between large patches of natural habitat. The project site and surrounding area are developed and in an urbanized area. Operations of the proposed project would not alter or disturb ornamental trees onsite that could be used for nesting by birds. Therefore, operation of the proposed project would not substantially interfere with the movement of wildlife or nursery sites. As such, no impacts would occur.

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

Less Than Significant Impact. The City of Lemon Grove Municipal Code Section 12.04.540, Trimming or Removal–Permit–Required, states that no person shall trim, prune, cut, break, deface, destroy, burn, or remove any tree, hedge, plant, shrub, or flower within City-owned public property without authorization from the Director of Public Works. The proposed project would not remove trees within the public right-of-way. Therefore, impacts would be less than significant.

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

No Impact. There are no habitat conservation plans, natural community conservation plans, or state habitat conservation plans that apply to the proposed project. The project site does not contain sensitive biological resources given its disturbed nature, and the surrounding area is urbanized. No impact would occur.

3.5 CULTURAL RESOURCES

Would the project:

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

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

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

i. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

ii. Is associated with the lives of persons important in our past;

iii. Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;

iv. Has yielded, or may be likely to yield, information important in prehistory or history.

The project site is disturbed and developed with a District office and the ECEC buildings. There are no state or national historic resources on the project site (NPS 2020; OHP 2024). Therefore, no impacts would occur.

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

No Impact. The project site is currently developed with a District Office and the ECEC buildings. Operations of the proposed project would include administrative and educational uses. As the proposed project does not include ground-disturbing activities, there is no potential to unearth archaeological resources during operational activities. Therefore, no impacts to archaeological resources occur.

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

No Impact. The project site is currently developed with a District Office and the ECEC buildings. The proposed project would not include ground disturbing activities. As such, there is no potential to unearth human remains. Therefore, no impacts to human remains would occur.

3.6 ENERGY

Existing Conditions

San Diego Gas & Electric (SDG&E) is the primary energy supplier in San Diego County and provides energy service to over 3.6 million customers in San Diego County and portions of southern Orange County. SDG&E has a diverse power production portfolio, composed of a variety of renewable and non-renewable sources. Energy production typically varies by season and 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.

The project site is served by existing electricity and natural gas connections supplied to the project site by SDG&E. Current energy demands consist of electricity and natural gas demand from the operation of the existing TK program and three District departments that are located in the buildings on the eastern portion of the site, and include building energy (e.g., electricity used for lighting and natural gas used for heating) and energy demand from vehicle trips.

Would the project:

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

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

Less Than Significant Impact. The following discusses the potential energy demands associated with operation of the proposed project.

Operation of the proposed project would involve the operation of the new ECEC facility, which would be an all-electric building, and create higher demands for electricity. The proposed project would also involve operation of the District Office; however, under the proposed project, the District Office would not generate

new energy demand during operation because the building would continue to operate in a similar capacity. All students and staff that would be hosted at the ECEC are existing elsewhere in the District, and would be relocated to the improved facilities on the project site. Therefore, this analysis does not include transportation energy consumption because vehicle trips associated with the proposed project already exist elsewhere in the District and would not increase as a result of the new ECEC facility. Similarly, because the District Office would continue operating in a similar capacity under the proposed project, energy consumption associated with the existing District Office is also omitted from this analysis. Operational use of energy would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems, use of on-site equipment and appliances; and indoor, outdoor, perimeter, and parking lot lighting.

Electrical Energy

Electrical service to the proposed project would be provided by SDG&E connections to existing onsite electrical lines. As shown in Table 3, *Electricity Consumption,* implementation of the proposed project would result in an increase of an estimated 436,114 kilowatt hours of electricity use per year.

Table 3 Electricity Consumption

Land Use	Electricity (kWh/year)
Proposed Project Conditions	
Early Childhood Education Center[1]	417,226
Parking Lot (Lighting)	18,888
Total	436,114

Source: CalEEMod Version 2022.1, Appendix A.
Notes:
[1] The new ECEC electricity consumption estimates account for an all-electric design.

While the proposed project would result in a higher electricity demand than existing conditions on-site, it was designed to be in compliance with the applicable Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen) in effect at the time site plans were submitted to the Division of the State Architect. Buildings compliant with these standards would generally have greater energy efficiency than older buildings. Encouraging sustainable and energy-efficient building practices and using more renewable energy strategies will further reduce building-related per capita energy consumption during operations of the campus and move closer toward achieving zero net energy. Compliance with these codes decreases overall reliance on fossil fuels and increase reliance on renewable energy sources for electricity generation. Therefore, operation of the proposed buildings would not result in wasteful or unnecessary electricity. Impacts would be less than significant.

Natural Gas

Implementation of the proposed project would not generate an increase in natural gas since the ECEC was designed to be all-electric. Furthermore, the new ECEC was designed to be compliant with the requirements of the Building Energy Efficiency Standards in effect at the time site plans were submitted to the Division of the State Architect, generally results in a decrease in overall per capita energy consumption, including gas when

applicable, when compared to older development. Compliance with these codes decreases overall reliance on fossil fuels and increase reliance on renewable energy sources for electricity generation. Ultimately, because the proposed project would result in no new natural gas consumption, there would be no impacts with respect to natural gas usage.

Transportation Energy

The proposed project would not result in an increase in students or staff overall for the District, and therefore, implementation of the proposed project would not generate additional vehicle fuel usage compared to existing conditions. Additionally, fuel efficiency of vehicles during the operational year of 2025 would on average improve compared to vehicle fuel efficiencies experienced under existing conditions, thereby resulting in a lower per capita fuel consumption in 2025 assuming travel distances, travel modes, and trip rates remain the same. The improvement in fuel efficiency would be attributable to the statewide fuel reduction strategies and regulatory compliances (e.g., Corporate Average Fuel Economy [CAFE] standards), resulting in new cars that are more fuel efficient and the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to land use development projects, but to car manufacturers. Therefore, the District does not have direct control in determining the fuel efficiency of vehicles manufactured and that are made available to staff and parents of students for personal transportation needs. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing the population of the project site's region more fuel-efficient vehicle options. Because vehicle fuel efficiencies would improve year over year through the operational year of 2025 and result in a decrease in overall per capita transportation energy consumption, impacts would be less than significant with respect to operation-related fuel usage.

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

No Impact. The State's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the state's renewable portfolios standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. Senate Bill 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures. On September 10, 2018, Senate Bill 100 (SB 100) was signed and raised California's RPS requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. SB 100 also established a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

The statewide RPS goal is not directly applicable to individual development projects, but to utilities and energy providers such as SDG&E, which is the utility provider that would provide all of electricity and gas needs for

the proposed project. Compliance of SDG&E in meeting the RPS goals would ensure the State in meeting its objective in transitioning to renewable energy. Furthermore, the ECEC was designed to be all-electric and would generally have greater energy efficiency than older buildings on the campus through compliance with the applicable requirements of the Building Energy Efficiency Standards and CALGreen.

Therefore, implementation of the proposed project would not conflict or obstruct plans for renewable energy or energy efficiency, and impacts would be less than significant.

3.7 GEOLOGY AND SOILS

Would the project:

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

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Based on the California Geological Survey, the project site is not within or immediately adjacent to an Alquist-Priolo Earthquake Fault Zone (CGS 2024a, CGS 2024b). No active faults are known to traverse the project site (CGS 2024a). The nearest Quaternary fault is the La Nacion Fault, which is approximately 3.75 miles west of the project site (CGS 2024a). Therefore, impacts would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. As stated in Impact 3.7.a.i, above, no faults are located in the immediate vicinity of the project site, and the project site is not within or immediately adjacent to an Alquist-Priolo Earthquake Fault Zone (CGS 2024a, CGS 2024b). The nearest active fault to the project site is the La Nacion Fault located approximately 3.75 miles west of the site. Therefore, impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction refers to loose, saturated sand, or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based upon three main contributing factors: 1) cohesionless, granular soils having relatively low densities (usually of Holocene age); 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking. Based on a review of the CGS Seismic Hazards Program: Liquefaction Zones, the project site is not within a liquefaction hazard zone (CGS 2022). Therefore, project implementation would not result in a significant impact from liquefaction. Additionally, all structures on the project site were constructed to adhere to the most recent version of the California Building Code (CBC) at the time of construction, and were reviewed by the California Geological Survey (CGS) and Division of State Architect (DSA), which ensured that the buildings were sufficiently evaluated for liquefaction potential. Therefore, no impact would occur.

iv) Landslides?

No Impact. Landsliding is a type of erosion in which masses of earth and rock move downslope as a single unit. The project site is developed and generally flat. According to the California Department of Conservation Landslide Inventory map, the project site is not in an area subject to landslides (DOC 2024c). Therefore, landslides are not considered a potential hazard at the project site. Additionally, all structures on the project site were constructed to adhere to the most recent version of the CBC at the time of construction, and were reviewed by the CGS and DSA which ensured that the buildings were sufficiently evaluated for landslides. Therefore, no impact would occur.

3. Environmental Analysis

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

Less Than Significant Impact. Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved, and removed from one place and transported to another. The project site is developed with the ECEC and District Office buildings and includes impervious surfaces (parking lots, buildings, hardcourts, etc.) as well as pervious surfaces (landscaping, etc.). The proposed project would not include grading or other ground disturbing activities. Operation of the proposed project would utilize structural and site design BMPs to control soil erosion and the loss of topsoil. Therefore, a less than significant impact would occur.

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

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

Subsidence of basins attributed to overdraft of groundwater aquifers or over pumping of petroleum reserves has been reported in various parts of California. Collapsible soils may appear strong and stable in their natural (dry) state, but they rapidly consolidate under wetting, generating large and often unexpected settlements. Seismically induced settlement consists of dynamic settlement of unsaturated soil (above groundwater) and liquefaction-induced settlement (below groundwater). These settlements occur primarily in low-density sandy soil due to the reduction in volume during and shortly after an earthquake. The proposed project would not require the withdrawal of groundwater from the site, and is not within areas of land subsidence according to USGS (USGS 2024). Impacts to subsidence would be less than significant.

The structures on the project site were constructed to comply with CBC and DSA criteria which ensured adequate design and construction of building foundations to resist soil movement. Operations of the proposed project would propose no changes to the structures. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. Expansive soils swell when they become wet and shrink when they dry out resulting in the potential for cracked building foundations. The soils onsite consist of Huerhuero-Urban Land Complect which are moderately well-drained loam that have a clay subsoil. While the runoff class is considered to be very high, and therefore, the shrink-swell potential is also considered to be high, the landscape has been altered through cut and fill operations and leveling which would have reduced the soil expansion potential. Additionally, the structures onsite were built to comply with the CBC and DSA requirements. Operations of

the proposed project would not impact expansion. Therefore, the proposed project would not expose people to adverse effects associated with expansive soils. Impacts would be less than significant.

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

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

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

No Impact. The project site is currently developed with a District Office and the ECEC buildings. The proposed project would not require grading and other ground disturbing activities, and as such, there is no potential to unearth paleontological resources. Therefore, no impacts to paleontological resources or unique geologic features would occur.

3.8 GREENHOUSE GAS EMISSIONS

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

- *Air Quality and Greenhouse Gas Emissions Analysis,* PlaceWorks, August 2024

A complete copy of the report is included in Appendix A to this Initial Study.

Existing Conditions

The existing TK program and three District departments that are located in the buildings on the eastern portion of the site onsite generate GHG emissions from transportation sources, energy (natural gas and purchased energy), and area sources such as landscaping equipment.

Discussion

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[1]

[1] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

3. Environmental Analysis

Black carbon emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this pollutant in the state's Assembly Bill (AB) 32 and Assembly Bill (AB 1279) inventory and treats this short-lived climate pollutant separately. Information on manufacturing of cement, steel, and other "life cycle" emissions that would occur as a result of the proposed project are not applicable and are not included in the analysis. As previously discussed, all students and staff that would be accommodated at the project site are existing elsewhere in the District and would be relocated to the improved facilities on the project site. Therefore, this analysis does not include mobile source GHG emissions because vehicle trips associated with the proposed project already exist elsewhere in the District and would not increase as a result of the proposed project.

Would the project:

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

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

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

Implementation of the proposed project would result in the new operation of the new ECEC campus and continued operation of the District Office. The new ECEC would generate additional GHG emissions from area, energy, water, and waste sources. As previously mentioned, this analysis does not include mobile source GHG emissions because vehicle trips associated with the proposed project already exist elsewhere in the District, and would not increase as a result of the new ECEC facility. As discussed in Section 1.5, *Project Description*, the District Office currently accommodates three District departments and the TK program, and the proposed project would relocate the remaining District departments to this facility and the TK program would move to the ECEC along with other programs from elsewhere in the District. As such, under the proposed project, the District Office would not produce new GHG emissions during operation because the building would continue to operate in a similar capacity. Because the District Office would continue operating in a similar capacity under the proposed project, GHG emissions associated with the District Office are not included in this analysis. Operational GHG emissions from building energy use would be minimized because the new buildings associated with the ECEC were designed to be all-electric and overall, more energy-efficient

in order to meet the applicable requirements of the California Building Energy Efficiency Standards and CALGreen.

To determine whether the proposed project could result in a potentially significant impact related to GHG emissions, the District has elected to utilize the California Air Pollution Control Officers Association's (CAPCOA) 2016 White Paper, *Final White Paper Beyond 2020 and Newhall*, for identifying an appropriate significance threshold that represents a 90-percent market capture for future emissions from discretionary development projects. Consistent with CAPCOA's 2016 White Paper, 900 metric tons of carbon dioxide equivalent ($MTCO_2e$) is utilized herein to determine whether a potentially significant impact would result from operation of the ECEC. As shown in Table 4, *Project-Related Net Operational GHG Emissions*, which quantifies net new emissions generated from the proposed project, illustrates that the proposed project would not exceed the significance threshold, and this impact would be less than significant.

Table 4 Project-Related Net Operational GHG Emissions

Source	Net GHG Emissions $MTCO_2e$ Per Year
Proposed Project	
Area	<1
Energy	117
Water	4
Waste	13
Refrigerants	<1
Total Net Increase	134
Significance Threshold	900 $MTCO_2e$/Yr
Exceeds Threshold?	No

Source: CalEEMod, Version 2022.1, Appendix A.
Notes: MT = metric tons; $MTCO_2e$ = metric ton of carbon dioxide equivalent

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

Less Than Significant Impact. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and SANDAG's Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), *San Diego Forward*. A consistency analysis with these plans is presented below.

California Air Resources Board Scoping Plan

CARB's Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by SB 32, which is to reduce GHG emissions to 40 percent below 1990 emission levels by year 2030. CARB recently adopted the 2022 Scoping Plan to achieve the state's carbon neutrality goals under EO B-55-18. The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties or individual projects (i.e., the Scoping Plan does not require a school district to adopt policies,

programs, or regulations to reduce GHG emissions). However, new regulations adopted by the state agencies outlined in the Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the low-carbon fuel standard (LCFS) and changes in the corporate average fuel economy standards (e.g., Pavley I and Pavley California Advanced Clean Cars program).

Operation of the proposed project would be required to adhere to binding programs and regulations identified by the Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32, SB 32, and AB 1279. In addition, the proposed project would preclude legacy source of GHG emissions[2] associated with on-going natural gas use in the new ECEC campus by designing it to be all-electric. The proposed project would also not increase student or staff capacity across the District, and therefore is not expected to increase vehicle miles traveled (VMT). Therefore, the proposed project would be consistent with State efforts to reduce motor vehicle emissions and generate GHG emissions consistent with the reduction goals of AB 32, SB 32, and AB 1279. The proposed project would not obstruct implementation of the CARB Scoping Plan, and a less than significant impact would occur.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The California legislature passed Senate Bill 375 (SB 375) to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a SCS in their regional transportation plans to achieve the per capita GHG reduction targets. SANDAG adopted San Diego Forward: The 2021 Regional Plan (2021 Regional Plan) in December 2021 which includes the region's SCS along with the RTP and Regional Comprehensive Plan (RCP). Currently, SANDAG is developing the Draft 2025 RTP with expected public feedback in spring 2025. The SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency for governments and developers.

The proposed project would be consistent with the 2021 Regional Plan as it would not conflict with implementation of its key goals. The 2021 Regional Plan goals include (1) the efficient movement of people and goods, (2) access to affordable, reliable, and safe mobility options for everyone, and (3) healthier air and reduced GHG emissions regionwide. As previously detailed, the proposed project would involve the operation of the new ECEC campus and continued operation of the existing District Office and would not increase student or staff capacity across the District, and would therefore not result in an increase in transportation-related GHG emissions. The proposed project would also not change underlying zoning or uses on the project

[2] While a "legacy source of GHG emissions" is not uniformly defined, it generally refers to GHG emission sources that persist in future years. Unlike other emission sources from new development that can be easily upgraded to reduce emissions, such as reducing area source emissions by using electric garden equipment instead of gasoline-fueled equipment or choosing to purchase renewable electricity services to reduce energy source GHG emissions, legacy sources are those that are structurally built into a project and are more difficult to remove or replace after initial project implementation, such as natural gas plumbing for space and water heating.

site. Therefore, the proposed project would not interfere with SANDAG's ability to implement the regional strategies outlined in the 2021 Regional Plan, and this impact would be less than significant.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

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

Less Than Significant Impact. Project operation would require the use of cleaners, solvents, pesticides, and other custodial products that are potentially hazardous. These materials would be used in relatively small quantities, clearly labeled, and stored in compliance with state and federal requirements. The handling, use, transport, and disposal of hazardous materials would comply with existing regulations of several agencies–the United States Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA), California Division of Occupational Safety and Health (Cal/OSHA), and the US Department of Transportation (DOT). The proposed project would operate as an ECEC and District Office. With the exercise

of normal safety practices, the project would not create substantial hazards to the public or the environment. Therefore, a less than significant impact would occur.

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

Less Than Significant Impact. As discussed in Impact 3.9.a. operation of the proposed project would require the use of cleaners, solvents, pesticides, and other custodial products that are potentially hazardous, though use and quantities of such hazardous materials would not warrant a significant hazard to the public. The project site would operate as an ECEC and District Office and would adhere to the existing regulations.

Additionally, the project site was formerly used as an orchard from at least 1953 to about 1966. Because the site was used historically for agricultural purposes, the District performed a Preliminary Environmental Assessment (PEA) to evaluate the potential for residual pesticides and metals in shallow soil and submitted the PEA to DTSC for review. District compliance with the requirements of the DTSC during the PEA process, and the requirements of the Environmental Oversight Agreement would reduce impacts of release hazardous materials. Compliance with applicable regulations during operational activities would ensure that risks resulting from the routine transportation, use, storage, or disposal of hazardous materials or hazardous wastes associated with the proposed project and the potential for accident release of hazardous materials is less than significant.

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

No Impact. Mt. Vernon Elementary School is located to the west and southwest of the project site. The proposed project would operate as an ECEC and District Office, and would not emit hazardous emissions or handle hazardous materials in significant quantities. Hazardous materials such as cleaners, solvents, pesticides, and other custodial products would be used in accordance with state and federal requirements, and would be used in small quantities.. Therefore, no impact would occur.

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

Less Than Significant Impact. Five environmental lists were searched for hazardous materials site on the project site:

1. GeoTracker. State Water Resources Control Board (SWRCB 2024)
2. EnviroStor. Department of Toxic Substances Control (DTSC 2024a)
3. EJScreen US Environmental Protection Agency (EPA 2024a)
4. EnviroMapper. US Environmental Protection Agency (EPA 2024b)
5. Solid Waste Information System (SWIS). California Department of Resources Recovery and Recycling (Cal Recycle 2024).

The project site is not listed on GeoTracker, EJ Screen, or the SWIS databases (SWRCB 2024; EPA 2024a; CalRecycle 2024).

EnviroMapper identified two hazardous waste sites at 8253 and 8248 Palm Street approximately 0.1 miles west (EPA 2024b). Both hazardous waste sites at 8253 and 8248 Palm Street are considered inactive as of August 16, 2019, and September 12, 2019, respectively (DTSC 2024b). Due to the inactive status of the sites, they would not pose a threat to the project site.

Additionally, the project site is listed on EnviroStor as a DTSC Clean-up site (DTSC 2024a). As discussed in Impact 3.9.b., the project site's former use required the District to perform a PEA and enter into an Environmental Oversight Agreement with DTSC. The District's compliance with the requirements of the DTSC during the PEA process, and the requirements of the Environmental Oversight Agreement would ensure no significant impacts would occur.

The proposed project would not construct or result in any ground disturbing activities that could cause a significant hazard to the public. The project site would operate as a District Office and ECEC. Therefore, would be less than significant.

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

No Impact. There are no airports within two miles of the project site. The closest airport to the project site is the Gillespie Field Airport approximately 6.7 miles north of the site (AirNav 2024). Therefore, no impact would occur.

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

Less Than Significant Impact. The proposed project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project site and surrounding properties during operation. Both the City Fire Marshal and DSA reviewed and approved fire access around the site. As part of the DSA process, a Fire and Life Safety Review was conducted to verify that occupants can safely exit the buildings in case of a fire. The proposed project would not result in inadequate emergency access, and impacts would be less than significant.

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

Less Than Significant Impact. The project site is not located in a very high fire hazard severity zone (VHFHSZ) (CAL FIRE 2024). The project site is located in an urbanized portion of the City. The buildings onsite were constructed to meet the latest requirements of the CBC and California Fire Code (CFC) at the time of construction. Therefore, impacts would be less than significant.

3. Environmental Analysis

3.10 HYDROLOGY AND WATER QUALITY

Would the project:

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

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

Less Than Significant Impact. The project site is within the jurisdiction of the San Diego Regional Water Quality Control Board (RWQCB). Drainage and surface water discharges during operation of the proposed project would not violate any water quality standards or waste discharge requirements. During operations, structural BMPs such as landscaping, site design BMPs such as increasing pervious surfaces, and source control BMPs such as storm drain stenciling on all storm drains would reduce runoff. The proposed project would use a combination of BMPs to meet State Water Resources Control Board's (SWRCB) requirements.

Additionally, as part of the statewide mandate to reduce trash in receiving waters, the proposed project would adhere to the requirements of the SWRCB Trash Amendments. The requirements include the installation and maintenance of full-capture trash screening devices at curb inlets, grate inlets, and catch basin inlets. The trash

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

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

Less Than Significant Impact. The proposed project would not include groundwater wells that would extract groundwater from an aquifer. Additionally, the proposed project would not affect recharge capabilities for groundwater. The project site is fully developed with the District Office and the ECEC, and would not increase the amount of impervious surfaces. The project site contains pervious surfaces which would also allow for absorption of water and runoff. Therefore, a less than significant impact would occur.

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

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

Less Than Significant Impact. The proposed project would not alter the course of a stream or river as none exist on the project site. The proposed project would include BMPs such as landscaping, which would reduce runoff. Therefore, a less than significant impact would occur.

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

Less Than Significant Impact. The proposed project would not involve the alteration of any natural drainage or watercourse, since none exist onsite. The project site is fully developed with the District Office and the ECEC, and would not increase the amount of impervious surfaces. The proposed project would continue to use the stormwater infrastructure onsite and in public rights-of-way. With the implementation of BMPs and compliance with local, state, and federal regulations, to ensure that drainage patterns and stormwater runoff are maintained, the rate and amount of runoff would not increase and result in flooding on or off site. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The project site includes pervious and impervious surfaces. With the proposed BMPs, impacts associated with impervious surfaces would be reduced. The proposed project would be required to comply with local, state, and federal regulations pertaining to stormwater. Therefore, the proposed project would not exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

iv) Impede or redirect flood flows?

No Impact. The project site is developed with a District Office and ECEC. The project site is within Zone X, 1 percent or less chance of annual flood, and not within a 100-year flood zone (Flood Insurance Rate Map ID #06073C1910G) (FEMA 2012). Since the project site is developed and would not result in construction, the proposed project would not impede or restrict flood flows. Therefore, no impact would occur.

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

No Impact. A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam or other artificial body of water. Although there are no large water tanks in the area that could impact the proposed project site, there are dams in the region that could create flooding impacts. According to the FEMA Map Service Center website and dam inundation maps provided by the California Department of Water Resources (DWR), and a review of the Bureau of Reclamation dam inundation maps, the site does not lie within a 100-year flood zone or within a dam inundation zone (FEMA 2012; DWR 2024; USACE 2024). Therefore, no impact would occur.

A tsunami is earthquake-induced flooding that is created from a large displacement of the ocean floor. The site is over 7 miles northeast of the Pacific Ocean; therefore, the likelihood of a tsunami impacting the project site is not likely. No impact would occur.

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

Provided that standard BMPs are implemented, the proposed project would not substantially degrade water quality. Therefore, no impacts related to the release of pollutants would occur.

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

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

3.11 LAND USE AND PLANNING

Would the project:

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

a) Physically divide an established community?

No Impact. The project site is surrounded by residential uses and Mt. Vernon Elementary School. The proposed project includes the operation of the District Office and ECEC within the project site boundaries. Therefore, the proposed project would not divide an established community and no impact would occur.

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

Less Than Significant Impact. The project site is currently zoned Residential Low Medium (RLM), and the land use designation is School/Institutional. Implementation of the proposed project would not change the zoning or land use designations of the site. The proposed project would not change the uses onsite, and impacts would be less than significant.

3.12 MINERAL RESOURCES

Would the project:

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

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

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

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

The project site is in MRZ-3, where the known or inferred mineral occurrences of undetermined mineral resource significance exists (DOC 1996). The project site is developed with the District Office and ECEC, and its surroundings areas are not developed for mineral extractions; the areas surrounding the project site are developed with buildings. Therefore, no loss of known resources would result from project implementation. No impact would occur.

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

No Impact. The entire City is within the MRZ-3 zone (DOC 1996). The project site is developed with the District Office and ECEC, and no mining activities occur onsite. Therefore, the proposed project would not result in a loss of availability of a mining site, and no impact would occur.

3.13 NOISE

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

- *Noise Analysis,* PlaceWorks, August 2024

A complete copy of the report is included in Appendix B to this Initial Study.

Noise Fundamentals

Noise is defined as unwanted sound and, when overexposed, is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, both the state, and city governments have established criteria to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction, communication, or sleep. Additional information on noise and vibration fundamentals and applicable regulations are contained in Appendix B.

Environmental Setting

Existing Noise Environment

The project site is bound by Plam Street and single-family residences to the north, single-family residences and Mt. Vernon Elementary School to the west, and single-family residences to the east and south.

The project site is in a predominantly residential area with a noise environment influenced primarily by transportation noise from local roadways, SR-125, and school operations adjacent to the project site. Noise from nearby residential uses (e.g., property maintenance and parking lot noise) also contributes to the noise environment intermittently in the project vicinity.

The City of Lemon Grove General Plan Noise Element includes future noise contours to assess the noise and land use compatibility of a project site. According to Figure N-2, 2015 Noise Contours, of the Lemon Grove General Plan, the project site is within the 65 to 60 dBA CNEL contour for roadway noise from SR-125, which is considered "conditionally acceptable" per the City's community noise and land use standards for schools (Lemon Grove 1996).

Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. These uses include residences, schools, hospital facilities, houses of worship, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. Sensitive receptors surrounding the project site are adjacent residences to the west and east of the site, as well as residences to the north across Palm Street approximately 80 feet away. In addition, Mt. Vernon Elementary School is directly adjacent to the west of the project site.

Applicable Standards

State Noise Regulations

Title 5, Section 14040(q) California Department of Education

Under Title 5, the California Department of Education (CDE) regulations require the school district to consider noise in the site selection process. As recommended by CDE guidance, if a school district is considering a potential school site near a freeway or other source of noise, it should hire an acoustical engineer to determine the level of sound that the site is exposed to and to assist in designing the school should that site be chosen.

California Building Code

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

The California Green Building Standards Code (CALGreen) has requirements for insulation that affects exterior-interior noise transmission for nonresidential structures. Pursuant to CALGreen Section 5.507.4.1,

3. Environmental Analysis

Exterior Noise Transmission, an architectural acoustics study may be required when a project site is within a 65 dBA CNEL or L_{dn} noise contour of an airport, freeway or expressway, railroad, industrial source or fixed-guideway source. Where noise contours are not readily available, if buildings are exposed to a noise level of 65 dBA L_{eq} during any hour of operation, specific wall and ceiling assembly and sound-rated windows may be necessary to reduce interior noise to acceptable levels.

City of Lemon Grove General Plan Noise Standards

Exterior Noise Standards

The City has developed policies related to noise and land use compatibly based on Federal and State exterior noise abatement criteria. Section 9.24.080 consists of noise abatement control for fixed and nonstationary sources.

Section 9.24.080 (A). Unless a variance has been applied for and granted pursuant to this chapter, it is unlawful for any person to operate, or cause to be operated, any single or combination of fixed source or nonstationary source type of equipment or machinery, except construction equipment used in connection with construction operations, that individually or collectively constitutes an identifiable sound source, in such a manner as to cause the average sound level at any point on or beyond the boundaries of the property on which the sound is produced to exceed by five decibels the noise level limits set forth in subsection B of this section, plus allowances for time duration in subsection C of this section.

Section 9.24.080 (B). Zone Ambient Noise Level Limits. "Noise level limit" or "sound level limit" referred to in this section means that noise level limit as determined from the table below:

Zone	Existing Peak Hour Leq	Allowable Noise Increment
RL, RL/M, RM	7 AM to 7 PM	50
	7 PM to 10 PM	45
	10 PM to 7 AM	40
RM/H, RP	7 AM to 7 PM	60
	7 PM to 10 PM	55
	10 PM to 7 AM	50
All Commercial Zones	7 AM to 7 PM	60
	7 PM to 10 PM	55
	10 PM to 7 AM	55
LI	Anytime	70

Section 9.24.080 (C). Time Duration Correction Table. The time duration allowances set forth in the table below shall apply to those noise level limits set forth above in the previous section.

Allowances for Sound Levels Lasting Less Than an Hour	
Existing L_{dn} Allowable Noise Increment	Allowable Decibels
Up to 30 minutes per hour (50%)	+3
Up to 15 minutes per hour (25%)	+6
Up to 10 minutes per hour (16%)	+8
Up to 5 minutes per hour (8%)	+11
Up to 2 minutes per hour (3%)	+15

Federal Transit Administration

The City of Lemon Grove does not have a quantified threshold for temporary construction noise and vibration. Therefore, to determine impact significance, the following Federal Transit Administration (FTA) criteria are adopted.

A vibration impact would occur if:

- Vibration levels would exceed 0.20 inches/second (in/sec) peak particle velocity (PPV) at the façade of a non-engineered structure (e.g., wood-frame residential). Additionally, the FTA's threshold of 72 vibration velocity (VdB) for frequent events will be used to assess vibration annoyance to residences at the nearby sensitive receptors.

Would the project result in:

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

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

Less Than Significant Impact.

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Operational Noise

Traffic Noise

A project will normally have a significant effect on the environment related to traffic noise if it substantially increases the ambient noise levels for adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an outdoor environment. Noise levels above 65 dBA CNEL are normally unacceptable at sensitive receptor locations such as residences, and noise environments in these areas would be considered degraded. Based on this, a significant impact would occur if the following traffic noise increases occur relative to the existing noise environment:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher
- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL
- 5 dBA in ambient noise environments of less than 60 dBA CNEL

Based on existing traffic noise modeling, a significant traffic noise impact occurs when the thresholds above are exceeded under cumulative conditions (with project) and the contribution of the proposed project to future traffic is calculated to be greater than 3 dBA CNEL for Palm Street.

Traffic volume data for the new trips associated with the proposed project are provided by Garland Associates (Appendix C). The proposed project is expected to generate a net increase of up to 2,040 daily trips to existing average daily trips (ADT). The data provided by the traffic engineer presents the street and locations with scenarios for existing, existing with project conditions, year 2026 with no project, and year 2026 with project conditions. Table 5, *Project-Related Increases in Traffic Noise, dBA CNEL at 50 Feet*, shows that with the addition of project trips due to the proposed project, there would result in an increase of 1 dBA or less over existing conditions. Therefore, the project would not result in a 3 dBA increase along Palm Street, and impacts would be less than significant.

Table 5 Project-Related Increases in Traffic Noise, dBA CNEL at 50 Feet

	Segment		Traffic Noise Increase					
Roadway	From	To	Existing No Project	Existing with Proposed Project	Existing Increase	Year 2026 No Project	Year 2026 with Proposed Project	Increase
Palm Street – West of Project Site	Palm Lane	West of Site	61.8	63.0	1.2	62.0	63.1	1.1
Palm Street – East of Project Site	Golden Avenue	East of Site	61.4	63.3	1.9	61.6	63.5	1.9

Source: Garland Associates 2024 and PlaceWorks 2024b

Mechanical Equipment

Per the client-provided information received, there would be five rooftop HVAC equipment units for the multi-purpose room, 16 closet mount units for the classrooms, two rooftop units for the administration building, and one rooftop unit for the library. Because closet mount units are located within the building, noise levels at off-site receptors would be negligible. Therefore, equipment analyzed would include only the rooftop equipment. Equipment is modeled at spatially averaged distances (i.e., from the acoustical center of the site to the property line of the nearest receptors) because the area around the center of the operation of the property best represents the potential average HVAC noise levels at the various distances for the rooftop equipment. For reference, typical HVAC noise is 72 dBA at 3 feet and the nearest sensitive receptors are residences approximately 190 feet to the west of the project site. At that distance, HVAC noise levels would attenuate to 50 dBA or less. This would not exceed the City's exterior noise limits for single-family residences at any time of day or night as indicated in Section 9.24.080 (B) of the Lemon Grove Municipal Code. Therefore, this impact would be less than significant.

Recreational Noise

The project site includes four distinct playground areas with elevated shade structures and organic pathways connecting them. Under the proposed project, the addition of the four outdoor playground areas could increase recreational noise levels at nearby sensitive receptors. As a worst-case scenario, project noise estimates are based on previously measured noise levels of a middle school track and field meet. During the track and field meet, noise levels measured were 66 dBA L_{eq} at 40 feet of approximately 150 people engaging in the activity. This analysis assumes 150 children are playing at the playground areas at a given time. The location of four proposed playground areas is dispersed throughout the ECEC. Therefore, to determine the noise levels from the playground areas to the nearest residence (i.e., residences to the west, the noise source at the acoustical center of the ECEC to the nearest noise sensitive receptor). Accounting for distance of 190 feet from the acoustical center, noise levels would be 54 dBA L_{eq} at the nearest residential property line to the west. The closest outdoor recreation areas are located directly behind the existing onsite ECEC buildings and these recreation areas would receive more than a 5-dBA reduction from shielding from the classroom buildings; noise levels would be less than 50 dBA $L_{eq.}$ Therefore, project operational noise would not exceed daytime noise standards of 50 dBA L_{eq} (per Section 9.24.080 (B), Fixed and Nonstationary Sources, of the Lemon Grove Municipal Code) and impacts would be less than significant.

Parking Lot Noise

The adjacent house to the west of the site along Palm Street would continue to experience noise due to vehicles idling and maneuvering at the parking lots, doors opening and closing, and voices in the parking lot areas and driveways, which would occur for short periods of approximately 10 to 20 minutes during student drop-off in the morning and student pick-up midafternoon. However, these periods are short term and would occur only during the daytime. Based on previous measurements conducted during student drop-off at an elementary school for another project, the average noise level measured was 55dBA Leq at 40 feet from the curb. Accounting for distances from the nearest school drop-off area to the nearest sensitive receptor (60 feet), school drop-off noise would be 50 dBA Leq at the nearest residential property line to the west of the project

site. Therefore, project operational noise would not exceed daytime noise standards of 55 dBA Leq (per Section 9.24.080 of the Lemon Grove Municipal Code) and impacts would be less than significant.

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

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

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

No Impact. The project site is approximately 6.7 miles south of the nearest public airport, which is the Gillespie Field Airport. At this distance, project implementation would not expose people residing or working in the project area to excessive levels. No impact would occur.

3.14 POPULATION AND HOUSING

Would the project:

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

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

Less Than Significant Impact. The special education program would have 75 students and 70 staff, and the ECEC would accommodate 400 students and 50 staff. These students and staff are currently housed at other campuses throughout the District. It is expected that the students that would fill the new classrooms would be existing residents living within the District's service boundary, and the proposed project would not directly increase population growth in the area. No construction of homes or businesses is proposed, nor extension of roads or other infrastructure. Project implementation would not induce population growth. Impacts would be less than significant.

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

No Impact. The project site is developed with the District Office and ECEC; operational activities would occur within the boundaries of the project site. Therefore, no housing or people would be displaced. No impact would occur.

3.15 PUBLIC SERVICES

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

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

a) Fire protection?

Less Than Significant Impact. Heartland Fire and Rescue provides fire protection and emergency services to the project site. The closest fire station to the project site is the Heartland Fire and Rescue Station 10, located at 7853 Central Avenue in the City of Lemon Grove, approximately 0.6-mile northwest of the project site. Emergency access to the project site is via the cul-de-sac on Palm Street, off of Camino de Las Palmas, at the northeastern portion of the site. Additionally, a fire lane loop extends around the buildings in the ECEC portion of the project site. The buildings onsite were constructed to meet the most recent version of the CFC at the time of construction, and the project site design was reviewed by the City Fire Marshal and DSA. As the proposed project would serve existing students in the District's attendance area, the proposed project would not result in a substantial increase in demand for fire protection services. Therefore, project implementation would not substantially affect the Fire Department's response times or require expansion of fire protection

services such that new or physically altered fire stations would be required. Impacts would be less than significant.

b) Police protection?

Less Than Significant Impact. Law enforcement and police protection services are provided by the San Diego County Sheriff's Department – Lemon Grove Substation at 3240 Main Street, approximately 0.75-mile northwest of the site. The proposed project would including fencing to control access and enclose playground areas, as well as lighting. Additionally, as the proposed project would serve existing students in the District's attendance area, the proposed project would not result in a substantial increase in demand for police protection services. Therefore, project implementation would not warrant additional law enforcement facilities. Impacts to police protection services would be less than significant.

c) Schools?

No Impact. School service needs are related to the size of a residential population, geographic area served, and community characteristics. The District would operate the former campus as a District Office and operate educational uses at the ECEC. The proposed project would serve existing students in the District's attendance area. Therefore, no impact on school facilities or services would occur.

d) Parks?

Less than Significant Impact. The proposed project would not generate a demand for parkland, which is typically caused by residential uses. The proposed project would include recreational facilities for the students at the ECEC. As such, impacts would be less than significant.

e) Other public facilities?

No Impact. The need for public services and facilities (e.g. libraries, hospitals, childcare, teen or senior centers) is typically caused by residential uses. As the project site would operate as a District Office and ECEC, it would not result in the development of housing; therefore, the proposed project would not result in the need for new or expanded public facilities. No impact would occur to public facilities.

3.16 RECREATION

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

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

No Impact. Operation of the proposed project would not require students to use existing neighborhood or regional parks. The project site includes playgrounds for use by the students at the ECEC. Additionally, as the proposed project would not induce population growth, there would be no substantial increase in the demand for recreational facilities. Therefore, no impacts to offsite recreational facilities as a result of the proposed project would occur.

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

Less Than Significant Impact. As discussed in Impact 3.16.a., the proposed project would not require construction of offsite recreational facilities to accommodate its program. The project site includes playground areas which would accommodate the recreational needs of students onsite. Therefore, impacts would be less than significant.

3.17 TRANSPORTATION

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

- *Traffic/Transportation Impact Analysis,* Garland Associates, February 2024

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

Would the project:

3. Environmental Analysis

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

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

Less Than Significant Impact. As shown in Table 6, *Project Generated Traffic,* the proposed project would generate an estimated 770 vehicle trips during the morning (428 inbound and 342 outbound) and 2,550 trips per day.

Table 6 Project Generated Traffic

Facility	AM Peak Hour			Daily Traffic
	Total	Inbound	Outbound	
Trip Generation Rates				
Education Center (Vehicle Trips per Student)	1.5	54%	46%	4.54
Offices (Vehicle Trips per Employee)	0.49	88%	12%	7.45
Generated Traffic Volumes				
Early Childhood Education Center (400 Students)	600	324	276	1,820
Special/Transitional Education (75 Students)	113	61	52	340
District Office (52 Employees)	57	43	14	390
Total	770	428	342	2,550

Source: Garland 2024 (Appendix C)
Notes:
- While the District Office would have 70 employees, 75% (52) would be office staff and 25% (18) would be educators associated with the special/transitional education facility.
- The trip rates for the educational facilities represent twice the average values shown in the manual for an elementary school because it is anticipated that an early childhood educational center and a special/transitional educational facility would generate a higher number of vehicle trips than a typical K-6 elementary school.
- The data in this table represents the total number of vehicle trips generated by the facilities, including staff/faculty vehicles, drop-off/pick-up activities, visitors, and deliveries.

The trip volumes in Table 6 do not represent new traffic to the overall roadway network, but instead, represent the traffic that would be redirected to the project site from other campuses within the District's boundaries, because the number of students attending school is a function of the school-age population and the demand for educational facilities. Most of the school-related and District Office traffic would be traveling on the roadway network regardless of the status of the proposed project.

Moreover, the proposed project would operate the District Office and ECEC on the project site, and would create a demand for non-motorized travel as some students, parents, and employees may elect to walk or ride bicycles. Palm Street adjacent to the project site and within the project area has sidewalks along the south side of the street, and the signalized intersection of Palm Street and Golden Avenue has yellow school-zone crosswalks and pedestrian crossing signals on all four sides. Bicycle lanes are provided on both sides of Palm Street adjacent to the project site and throughout the project area, as well as along Skyline Drive, approximately 0.4-mile west of the site. The San Diego Metropolitan Transit System (MTS) operates Route 936 on Skyline Drive and Route 856 on Sweetwater Road, approximately 0.25-mile east of the project site. The proposed project would not make changes to non-motorized modes of travel. The proposed project would support the use of alternative modes of transportation as the project site is situated in an area that provides these facilities.

Overall, the proposed project would not adversely affect the performance of any roadway, transit, or non-motorized transportation facilities and would not conflict with any plans or policies related to these transportation modes. Therefore, impacts would be less than significant.

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

No Impact. Section 3.3.1, Screening Criteria for CEQA VMT Analysis, of the San Diego County Transportation Study Guidelines (September 2022), states that public facilities that serve the surrounding community may be presumed to have a less than significant impact. The guidelines provide a list of locally serving public facilities, which includes schools and government offices. As the proposed project is a District Office and ECEC, the proposed project would be screened from any further vehicle miles traveled (VMT) analysis. Therefore, no impacts would occur.

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

Less Than Significant Impact. Ingress to the parking area at the northeastern portion of the site is provided via the signalized intersection of Palm Street and Golden Avenue, and egress would be provided via two lanes (one right-turn only and one left-turn only) at the northeastern portion of the site, at a signalized intersection at Palm Street and the campus driveway. The parking lot in the northwestern portion of the site would also be accessible via the driveway at the intersection of Palm Street and Golden Avenue. A crosswalk would be provided in this parking lot to allow access to and from the parking lot. A bus loading/unloading area would also be provided in the parking lot; the flow of vehicular traffic would be counterclockwise. While the project site and project area would experience an increase in traffic and pedestrians, impacts would not be significant because the streets, intersections, and driveways are designed to accommodate the anticipated levels of vehicular and pedestrian activity. The streets and intersections in the project area have been accommodating school-related traffic on a daily basis given the project site was formerly used as a school campus. As such, the proposed project would not result in any major safety or operational issues related to access or circulation, and would not result in a substantial increase in hazards due to a geometric design feature or incompatible uses. Therefore, impacts would be less than significant.

d) Result in inadequate emergency access?

No Impact. The access and circulation features at the project site, including onsite roadways, parking lots, and fire lanes, would accommodate emergency ingress and egress by emergency vehicles. The ECEC portion of the site includes a fire lane loop that extends around the buildings. Emergency access to the site is also provided via the cul-de-sac on Palm Street, off of Camino de Las Palmas, at the northeastern portion of the site. The project site was designed to meet the standards of the CFC and DSA, and design plans were reviewed by the City Fire Marshal. The proposed project would not result in changes to the project site's design or access. Therefore, no impacts would occur.

3.18 TRIBAL CULTURAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				X
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				X

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

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

No Impact. The project site is developed with the District Office and ECEC buildings. There are no state or national historic resources on the project site, as stated in Impact 3.5.a., above. The proposed project

would operate administrative and educational uses on the project site; no building alterations or demolition would occur. Therefore, no impacts would occur.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

No Impact. The project site is developed with the District Office and ECEC buildings. Operations of the proposed project would include administrative and educational uses. As the proposed project does not include ground-disturbing activities, there is no potential to unearth tribal cultural resources during operational activities. Therefore, no impacts would occur.

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

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

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

No Impact. The project site is developed with the District Office and ECEC buildings. Operations of the proposed project would include administrative and educational uses. The proposed project would not include

ground-disturbing activities, and therefore, would not require the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Therefore, no impacts would occur.

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

Less Than Significant Impact. The project site is within the San Diego Regional Water Quality Control Board region. As the proposed project would relocate students and staff from other campuses within the District to the project site, the proposed project would not result in a substantial increase in water demand compared to existing conditions. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The Lemon Grove Sanitation District is responsible for the collection of wastewater within the City. The proposed project would relocate students and staff from other campuses within the District to the project site. As such, the proposed project would not result in a substantial increase in wastewater generation compared to existing conditions. Therefore, it is anticipated that the wastewater facilities would continue to have adequate capacity to serve the proposed project. Therefore, impacts would be less than significant.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Waste from the proposed project would be transported to the West Miramar Sanitary Landfill at 5180 Convoy Street in San Diego, California. The West Miramar Sanitary Landfill has a maximum daily permitted disposal rate of 8,000 tons per day (CalRecycle 2024). The Landfill has a remaining capacity of 11,080,871 cubic yards and a cease operation date of January 1, 2031 (CalRecycle 2024). According to CalRecycle, the solid waste generation rate for schools is 1 pound per student per day (lb/student/day) and 0.6 lb/person/day for employees (CalRecycle 2019). The special education program would have 75 students and 70 staff, and the ECEC would accommodate 400 students and 50 staff. Therefore, the proposed project would be expected to generate 547 lbs/day.[3] The proposed project would make up approximately 0.003 percent per day[4] of the Landfill's maximum daily disposal rate. Therefore, the proposed project would result in a nominal increase and impacts would be less than significant.

[3] Students = 475, staff = 120 staff
475 students x 1 lb/student/day = 475 lb/day
120 staff x 0.6 lb/person/day = 72 lb/day
Total = 72 lb/day + 475 lb/day = 547 lb/day

[4] 1 lb = 0.0005 ton
547 lb = 0.27 ton
0.27 ton (proposed project) / 8,000 ton (landfill maximum throughput) = 0.00003375 ton

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

Less Than Significant Impact. Solid waste would be generated during operation of the proposed project. The proposed project would comply with all regulations pertaining to solid waste, such as the California Integrated Waste Management Act and local recycling and waste programs. The proposed project would comply with all applicable local, state, and federal statutes and regulations related to solid waste disposal. Therefore, impacts would be less than significant.

3.20 WILDFIRE

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

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

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

Less Than Significant Impact. The proposed project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project site and surrounding properties during operation. Both the City Fire Marshal and DSA reviewed and to approved the fire access on the project site. As part of the DSA process, a Fire and Life Safety Review was conducted to verify occupants can safely exit the buildings in case of a fire. The proposed project would not result in inadequate emergency access, and impacts would be less than significant.

0.0000341875 ton x 100 = 0.003 percent

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

Less Than Significant Impact. There are three primary factors used in assessing wildfire hazards—topography, weather, and fuel. The project site is relatively flat and is in an urbanized environment. The proposed project would not impact weather or topography. The site is developed with a District Office and the ECEC, and includes pervious and impervious surfaces. According to CAL FIRE, the project site is not within a VHFHSZ (CAL FIRE 2024). Therefore, the project and site conditions would not contribute to an increase in exposure to wildfire risk. Additionally, the buildings onsite were constructed to meet the most recent versions of the CBC and CFC at the time of construction. As the proposed project would not impact weather or topography, impacts would be less than significant.

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

Less Than Significant Impact. The proposed project would not require connections to utilities as the project site is currently developed with a District Office and the ECEC. The utilities onsite were installed to meet service requirements. Operations of the proposed project would not exacerbate fire risk. The project site is currently developed, located in an urbanized portion of the City, and is not within a VHFHSZ. Impacts would be less than significant.

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

Less Than Significant Impact. The project site is relatively flat. As indicated in Impact 3.7.a.iv, the project site is not in an area subject to landslides. Additionally, as indicated in Impact 3.10.c.iv, the project site is within Zone X and is not within a 100-year flood zone. The project site is developed with a District Office and ECEC. Operational activities would include BMPs to reduce impacts associated with slope instability. As the project site is not within a VHFHSZ, landslide, or flood zone, impacts would be less than significant.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. As discussed above in Section 3.4, *Biological Resources*, given that the project site and surrounding area are developed and disturbed by human activities, it is unlikely that there are sensitive animal or plant species onsite, and there are no natural or riparian/wetland habitats that exist onsite or in the vicinity of the project site. Additionally, the proposed project would not remove any trees within the public right-of-way. Impacts to biological resources would be less than significant.

As discussed under Section 3.5, *Cultural Resources*, and Section 3.7, *Geology and Soils*, the project site is developed with a District Office and the ECEC buildings; there are no state or national historic resources onsite. Operation of the proposed project would not include ground-disturbing activities; therefore, there is no potential to unearth archaeological resources or paleontological resources, disturb human remains, or impact historic resources during operational activities. Therefore, no impacts would occur. Furthermore, as discussed in Section 3.18, *Tribal Cultural Resources*, the project site is developed and there are no state or national historic resources on the project site. Additionally, since the proposed project does not include ground-disturbing activities, there is no potential to unearth tribal cultural resources during operational activities. Therefore, no impacts to tribal cultural resources would occur.

3. Environmental Analysis

The proposed project would not have the potential to degrade the quality of the environment, reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal nor eliminate important examples of the major periods of California history or prehistory. A less than significant impact would occur.

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

Less Than Significant Impact. The potential for cumulative impacts occurs when the independent impacts of a given project are combined with the impacts of related projects in proximity to the project site that would create impacts that are greater than those of the project alone. As discussed previously in this Initial Study/Negative Declaration, the proposed project would have no impact or a less than significant impact to all the environmental topical areas discussed. Therefore, all impacts are individually limited and would not result in any cumulatively significant impact. Impacts would be less than significant.

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

Less Than Significant Impact. The proposed project would comply with applicable local, state, and federal laws governing general welfare and environmental protection. Operation of the proposed project, as specified in this Initial Study/Negative Declaration would result in no impact or a less than significant impact. The proposed project would not, directly nor indirectly, result in environmental effects that could cause substantial adverse effects on human beings. A less than significant impact would occur.

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4. References

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