

April 2025 | Initial Study

MISSION HILLS HIGH SCHOOL SITEWIDE ATHLETIC IMPROVEMENTS PROJECT

San Marcos Unified School District

Prepared for:

San Marcos Unified School District

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Abbreviations and Acronyms

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

Abbreviations and Acronyms

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

Abbreviations and Acronyms

MPO	metropolitan planning organization
MT	metric ton
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O ₃	ozone
OES	California Office of Emergency Services
PM	particulate matter
POTW	publicly owned treatment works
ppm	parts per million
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMP	risk management plan
RMS	root mean square
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Government
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

Abbreviations and Acronyms

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

1. Introduction

The San Marcos Unified School District (District) proposes to replace the natural turf with synthetic turf and install permanent non-directional lighting to replace the temporary lighting at the existing multi-purpose field; the District would also resurface the existing stadium and tennis courts, and remove two existing tennis courts and replace them with three volleyball courts (proposed project).

In compliance with the California Environmental Quality Act (CEQA), the San Marcos Unified School District, as lead agency, is preparing the environmental documentation for the proposed project to determine if approval of the requested discretionary actions and subsequent development would have a significant impact on the environment. As defined by Section 15063 of the CEQA Guidelines, an initial study is prepared primarily to provide the lead agency with information to use as the basis for determining whether an environmental impact report, negative declaration (ND), or mitigated negative declaration (MND) would provide the necessary environmental documentation and clearance for the proposed project. This initial study has been prepared to support the adoption of an MND.

1.1 PROJECT LOCATION

Mission Hills High School is part of the San Marcos Unified School District and is at 1 Mission Hills Court in the City of San Marcos, San Diego County (Assessor's Parcel Numbers [APN] 220-231-4100 and 220-231-0300). The Mission Hills High School Field Lighting and Sports Facilities Project would be developed within the existing school campus.

The City of San Marcos is in northern San Diego County and is bounded by the City of Escondido to the east, unincorporated San Diego County to the south and north, the City of Encinitas to the southwest, the City of Carlsbad to the west, and the City of Vista to the northwest. Regional access to the City is provided by Interstate 15 (I-15) and State Route 78 (SR-78). I-15 is approximately 2.5 miles to the east of the project site, and SR-78 approximately 0.25-mile south of the project site. See Figure 1, *Regional Location*.

Mission Hills High School is bounded by residential uses to the northeast and east; Hollandia Park to the northwest; and industrial uses to the south (see Figure 2, *Local Vicinity*, and see Figure 3 *Aerial Photograph*).

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing Land Use

San Marcos Unified School District

The San Marcos Unified School District provides public education in the City of San Marcos and a portion of Carlsbad, Vista, Escondido, and unincorporated San Diego County. The District operates 19 school facilities: 10 elementary schools, three middle schools, two K-8 schools, three high schools, and one adult

1. Introduction

schools/programs (SMUSD 2025). The total District enrollment during the 2023-2024 school year was 19,456 students (CDE 2025).

Mission Hills High School

According to the San Marcos General Plan Land Use and Zoning Maps, Mission Hills High School is designated Public Institutional (PI) and zoned Public-Institutional (P-I), respectively.

Mission Hills High School serves students in grades 9 through 12 and had a total enrollment of 2,834 students during the 2023-2024 school year (CDE 2025). The Mission Hills High School campus is approximately 45 acres, and consists of tennis courts, a baseball field, and a parking lot in the northern portion of the site; a multi-purpose field, a softball field, hardcourts, and parking lot in the southeastern portion of the site; classroom and administrative buildings and a parking lot in the northern portion of the site; and a football field in the southern portion of the site. Landscaping is included throughout the campus.

1.2.2 Surrounding Land Use

The campus is bordered by residential uses to the northeast and east; Hollandia Park to the northwest; and industrial uses to the south. Richland Road, Mission Road, Mission Hills Court, and Rock Springs Road bound the eastern, southern, western, and northwestern portions of the campus, respectively. The multi-purpose field, where the proposed lighting would be installed, is located to the west of the residential uses on Richland Road, as shown on Figure 3 *Aerial Photograph*.

The properties surrounding the campus have a land use designation of Parks (P), Very Low Density Residential (VLDR), Low Density Residential (LDR), Medium Density Residential 2 (MDR2), Industrial (I); and are zoned Public-Institutional (P-I), Residential Low (R-1-10), Residential (R-1-7.5), Residential (R-3-10), and Industrial (I-2).

Figure 1 - Regional Location



Note: Unincorporated county areas are shown in white.

Source: Generated using ArcMap, Inc. 2023.

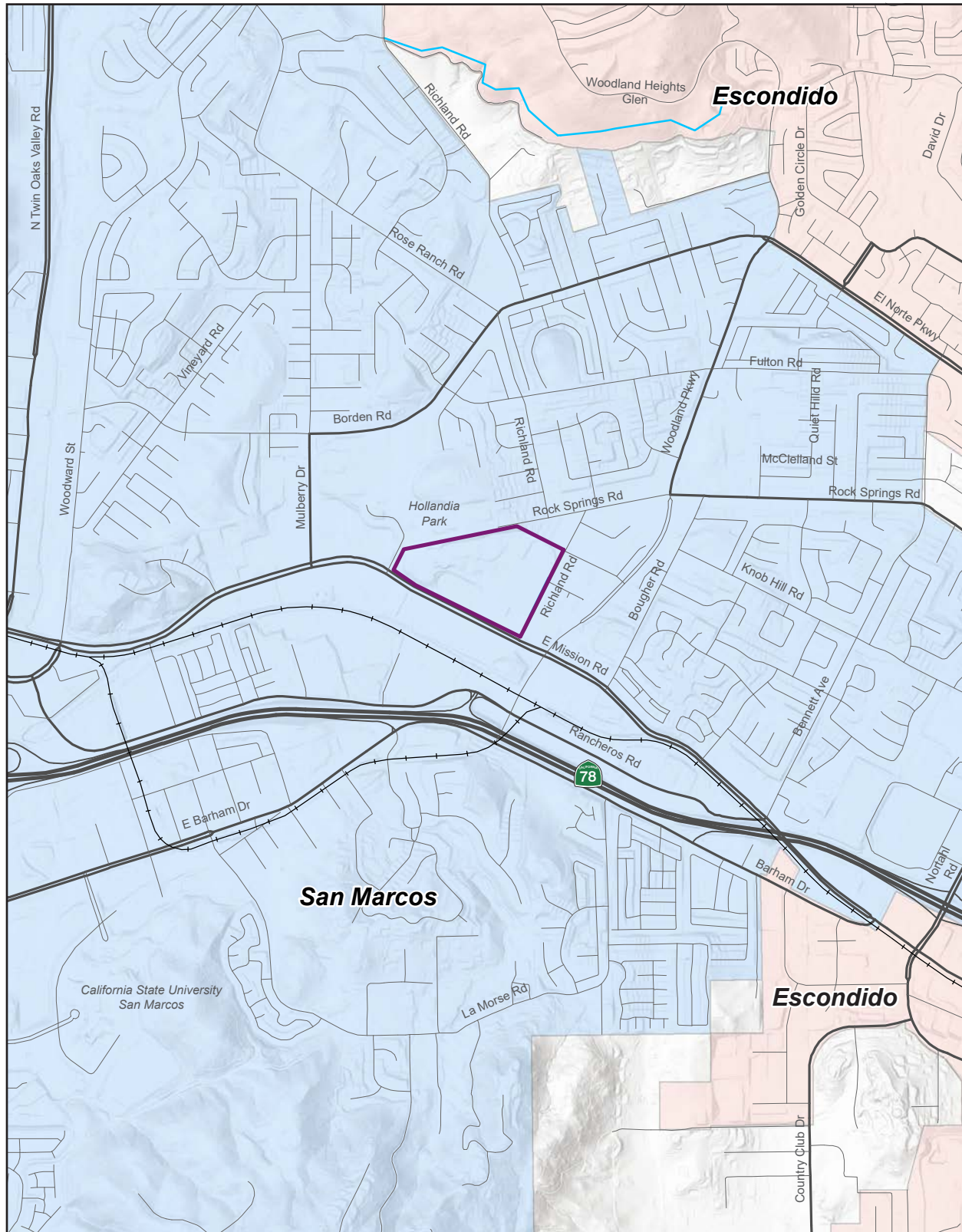
0 3
Scale (Miles)



1. Introduction

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Figure 2 - Local Vicinity



— Mission Hills High School Boundary

Note: Unincorporated county areas are shown in white.

Source: Generated using ArcMap, Inc. 2023.

0 2,000
Scale (Feet)



1. Introduction

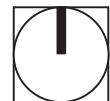
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Figure 3 - Aerial Photograph



— Mission Hills High School Boundary

0 600
Scale (Feet)



Source: Nearmap, Inc. 2023.

1. Introduction

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1. Introduction

1.3 PROJECT DESCRIPTION

The proposed project would include replacing the natural turf with synthetic turf and installing permanent non-directional lighting to replace the temporary lighting at the existing multi-purpose field. The proposed project would also include resurfacing the existing stadium and tennis courts, and removing two existing tennis courts and replacing them with three volleyball courts. The proposed project would not result in changes to student, staff, or bleacher capacity, and no additional lighting or Public Address (PA) systems would be added to the stadium, volleyball courts, and tennis courts. Figure 4, *Conceptual Site Plan*, shows the locations of the proposed improvements.

Multi-purpose Field

The District is proposing to add permanent nighttime sports lighting to the existing multi-purpose field, at the eastern portion of the site, as shown in Figure 5, *Proposed Field Lighting Locations*. The proposed lighting improvements are prompted by the passage of Senate Bill (SB) 328, which requires high schools to start no earlier than 8:30 am. Instituting a later start time is expected to reduce the negative impacts of sleep deprivation on adolescents and give them multiple health, safety, and learning benefits. However, with the later start time, schools will also end later, which will affect sports activities. Currently, the multi-purpose field is lit for evening use using temporary lights.

The field lighting would consist of four, 70-foot galvanized steel light poles with pre-cast concrete bases. There would be a total of 16 LED luminaires. The proposed lighting would provide an average of 31 footcandles (fc), with a minimum light level of 25 fc and a maximum light level of 42 fc. The lighting has been designed to meet the California Interscholastic Federation field lighting recommendations for competitive events. Appendix A, *Lighting Plan*, includes details on the proposed lighting.

The intent of the field lighting is to extend the hours available for team practices at Mission Hills High School. The school currently uses temporary field lights on the field during night time practice. The existing multi-purpose field does not have bleachers or seating to accommodate spectators, nor would bleachers/benches be added. The multi-purpose field would be used for practice only. Mission Hills High School would be able to have practice onsite instead of using other locations, such as Palomar Community College, San Marcos Middle School, and Woodland Park Middle School.

Additionally, the existing natural turf at the multi-purpose field would be replaced with new synthetic turf. The practice area at the southern portion of the multi-purpose field would remain as natural turf, and the existing shot put and discus facilities would remain. The proposed project would require limited demolition of softscape to install lighting poles and replace the natural turf with synthetic turf at the existing multi-purpose field. No structural demolition would be required, and no PA system would be installed.

Activities and Events

The following includes potential activities and events that would occur on the multi-purpose field after school hours:

- August through October: Fall sports and marching band. Use of field until 8 p.m.

1. Introduction

- November: Fall and winter sports and marching band. Use of field until 9 p.m.
- December – January: Winter and spring sports. Use of field until 9 p.m.
- March – June: Spring sports. Lights on the field would be needed when the stadium is being used for games or events; use of field until 9 pm.

Stadium

The existing stadium in the southwestern portion of the site would be resurfaced to allow for the continued use of the track and field for football, soccer, boy's and girl's lacrosse, field hockey, and flag football; no changes to games or events at the stadium would occur. The proposed project would install ball control netting at each of the end zones, as well as remove and replace: long/triple jump take-off boards, base mat, and potentially contaminated aggregate at the perimeter of the field. The proposed project may also include installing new slot drains on the north and south track straights.

Natural Turf Field

The existing natural turf field north of the multi-purpose field would remain.

Tennis and Volleyball Courts

The asphalt of the 10 existing tennis courts would be removed, eight of the tennis courts would be paved in concrete, and the two eastern tennis courts would be removed and replaced with three new sand volleyball courts. The existing chain link fence would be removed and replaced with new fence; the maintenance gates and accessible pathways would be reconstructed. The proposed project would also remove and replace the net posts and center hold downs, and would construct a new continuous trench drain at the eastern courts to allow discharge into the existing storm drain system. The landscaping to the east and south of the tennis courts would be restored. No changes to the tennis games would occur as a result of the reduction in courts; however, the number of spectators is expected to decrease from 20 to 14-16 spectators. The proposed volleyball games are anticipated to have 2-8 spectators.

1.3.2 Project Phasing

The project construction is anticipated to start in June 2025 and to finish by late November 2025.

1.4 EXISTING ZONING AND GENERAL PLAN

The high school has a land use designation of Public Institutional (PI) and is zoned Public-Institutional (P-I).

1.5 DISTRICT ACTION REQUESTED

- Approve the proposed project.
- Adopt the Mitigated Negative Declaration.
- Adopt the Mitigation Monitoring and Reporting Program.

Figure 4 - Conceptual Site Plan



1. Introduction

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Figure 5 - Proposed Field Lighting Locations



Mission Hills High School Recreation Field

San Marcos, CA

Equipment Layout

INCLUDES:
· Football Practice

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.

Equipment List For Areas Shown

Pole				Luminaires		
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE
2	F1	70'	-	70'	TLC-LED-1200	1
	F4			70'	TLC-LED-1500	3
2	F2-F3	70'	-	70'	TLC-LED-1200	2
				70'	TLC-LED-1500	2
4	Totals					16

Single Luminaire Amperage Draw Chart

Driver Specifications (.90 min power factor)	Line Amperage Per Luminaire (max draw)						
	208 (60)	220 (60)	240 (60)	277 (60)	347 (60)	380 (60)	480 (60)
Single Phase Voltage							
TLC-LED-1500	8.4	7.9	7.3	6.3	5.0	4.6	3.6
TLC-LED-1200	6.9	6.5	6.0	5.2	4.2	3.8	3.0

Pole location(s) ⓧ dimensions are relative to 0,0 reference point(s) ⊗

Mission Hills High School Boundary
Multi-Purpose Field

Source: MUSCO 2025.



1. Introduction

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2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** Mission Hills High School Field Lighting and Sports Facilities Project

2. **Lead Agency Name and Address:**

San Marcos Unified School District
255 Pico Avenue, Suite 250
San Marcos, California 92069

3. **Contact Person and Phone Number:**

Tova Kay Corman, Executive Director, Facilities Planning and Development
760.752.1227

4. **Project Location:** 1 Mission Hills Court, San Marcos, California.

5. **Project Sponsor's Name and Address:**

San Marcos Unified School District
255 Pico Avenue, Suite 250
San Marcos, California 92069

6. **General Plan Designation:** Public Institutional (PI)

7. **Zoning:** Public-Institutional (P-I)

8. **Description of Project:**

The proposed project would include replacing the natural turf with synthetic turf and installing permanent non-directional lighting to replace the temporary lighting at the existing multi-purpose field. The proposed project would also include resurfacing the existing stadium and tennis courts, and removing two existing tennis courts and replacing them with three volleyball courts.

9. **Surrounding Land Uses and Setting:**

The campus is bordered by residential uses to the northeast and east; Hollandia Park to the northwest; and industrial uses to the south. Richland Road, Mission Road, Mission Court, and Rock Springs Road bound the eastern, southern, western, and northwestern portions of the campus, respectively. The multi-purpose field, where the proposed lighting would be installed, is located to the west of the residential uses on Richland Road.

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

Division of State Architect

2. Environmental Checklist

California Department of Education

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

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

The District notified the Rincon Band of Luiseno Indians about the proposed project on June 2, 2023, and January 31, 2025. See Section 3.18, *Tribal Cultural Resources*.

2. Environmental Checklist

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- | | | |
|--|---|--|
| ☐ 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.

Signature

Tova K. Corman

Date

3/31/2025

Exec. Director, Facilities
Planning & Development

2. Environmental Checklist

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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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 of San Marcos General plan describes scenic vistas as views of Mount Whitney, Double Peak, Owens Peak, San Marcos Mountains, Merriam Mountains, Cerro de Las Posas, Franks Peak, San Elijo Hills, and canyon areas (San Marcos 2012a). The City designates SR-78 as a view corridor (San Marcos 2012a). SR-78 is approximately 0.25-mile south of the campus. Figure 4-5, Scenic Resources, of the Conservation and Open Space Element of the General Plan, shows the locations of the scenic ridgelines in the City. The campus is over 1 mile away from the designated ridgelines, as shown in Figure 4-5, Scenic Resources, of the Conservation and Open Space Element in the City's General Plan. The proposed project would install field lighting and replace the natural turf with synthetic turf at the existing multi-purpose field, resurface the existing stadium and tennis courts, and remove two existing tennis courts and replace them with three volleyball courts at Mission Hills High School. Given the distance, topography, and intervening development between the project site and scenic resources, the proposed project would not obstruct or alter

3. Environmental Analysis

views of any scenic vista. Views of these scenic vistas would continue to be visible from surrounding roadways. 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 officially designated state scenic highway is SR-52 approximately 21 miles south of the campus. The nearest eligible designated state scenic highways are SR-76 and I-5, both approximately 10 miles north and west, respectively (Caltrans 2019). The City of San Marcos General Plan designates SR-78 as a view corridor and stated SR-78 is eligible as a State scenic highway; however, the segment eligible as a State scenic highway is approximately 27 miles west of the project site. Due to the distance, topography, and intervening development, the proposed project would not be visible from a State scenic highway and would not result in changes or damage to scenic resources within a State Scenic highway. 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. Mission Hills High School is located within a fully urbanized portion of the City with residential, park, and industrial uses surrounding the campus. The lighting and recreational improvements are proposed on an existing high school campus, consistent with its Public-Institutional (P-I) zoning. The proposed light poles and improvements to the sports facilities would not adversely affect scenic views as other vertical elements currently exist on the campus and surrounding areas such as fencing, light poles on the football field, baseball netting, and power lines. Under existing conditions, views from the residential uses to the east are obstructed due to the difference in elevation as well as intervening trees, fencing, power lines, and other vertical elements.

The campus is in an urbanized area, the proposed project would not degrade views of any scenic resource, the project is consistent with its Public-Institutional (P-I) zoning and would not violate any regulations governing scenic quality. 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.

New permanent lighting fixtures would be installed on the existing multi-purpose field, as described in Section 1.3, *Project Description*. The existing school generates nighttime light from the parking lots, building lights (interior and exterior), and field lighting at the football and multi-purpose fields. Surrounding land uses also generate lights from streetlights, vehicle lights, and building lights, typical in urban neighborhoods.

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Terminology

The foot-candle (fc) is a unit based on English measurements. Although foot-candles are considered obsolete in some scientific circles, they are nevertheless used because many existing light meters are calibrated in foot-candles. Moonlight produces approximately 0.01 fc, and sunlight can produce up to 10,000 fc. The general benchmarks for light levels are shown in Table 1, *General Light Levels Benchmark*.

Table 1 General Light Levels Benchmark

Outdoor Light	Foot-Candles
Direct Sunlight	10,000
Full Daylight	1,000
Overcast Day	100
Dusk	10
Twilight	1
Deep Twilight	0.1
Full Moon	0.01
Quarter Moon	0.001
Moonless Night	0.0001
Overcast Night	0.00001
Gas Station Canopies	25-30
Typical Neighborhood Streetlight/Parking Garage	1-5

Horizontal foot-candle. The amount of light received on a horizontal surface such as a roadway or parking lot pavement.

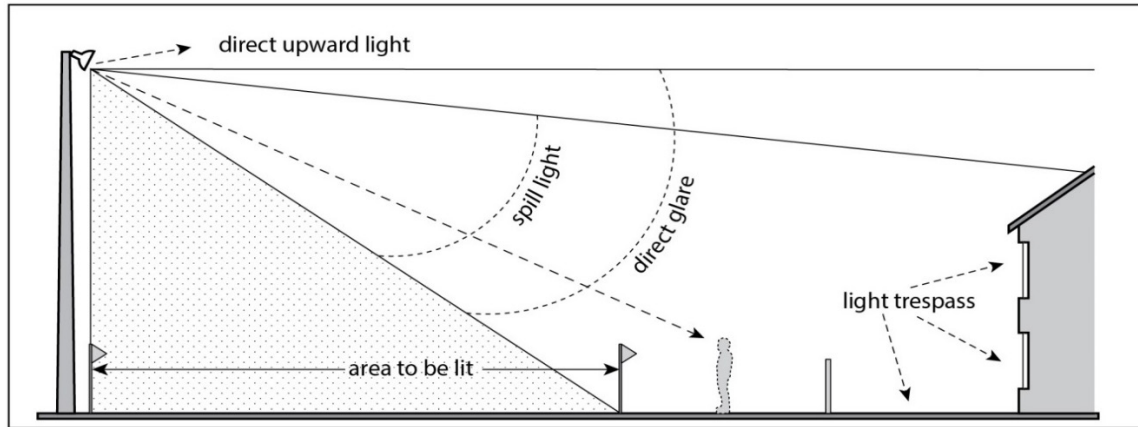
Vertical foot-candle. The amount of light received on a vertical surface such as a billboard or building façade.

Glare means lighting entering the eye directly from a light fixture or indirectly from reflective surfaces that causes visual discomfort or reduced visibility. Glare can be generated by building-exterior materials, surface-paving materials, vehicles traveling or parked on roads and driveways, and sports lights. Any highly reflective façade material is a concern because buildings can reflect sunrays. The concepts of spill light, direct glare, and light trespass are illustrated in Exhibit A, *Spill Light, Direct Glare, and Light Trespass*, adapted from the Institution of Lighting Engineers (ILE 2003).

Direct glare is caused by looking at an unshielded lamp or a light at maximum candlepower. Direct glare is dependent on the brightness of the light source, the contrast in brightness between the light source and the surrounding environment, the size of the light source, and its position.

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Exhibit A: Spill Light, Direct Glare, and Light Trespass



Illuminance is the amount of light on a surface or plane, typically expressed in a horizontal plane (e.g., on the ground) or in a vertical plane (e.g., on the side of a building).

Lumen means the unit of measure used to quantify the amount of visible light produced by a light source or emitted from a luminaire (as distinct from “watt,” a measure of power consumption).

Luminaire means outdoor electrically powered illuminating devices that include a light source, outdoor reflective or refractive surfaces, lenses, electrical connectors and components, and all parts used to mount the assembly, distribute the light, and/or protect the light source, whether permanently installed or portable. An important component of luminaires is their shielding:

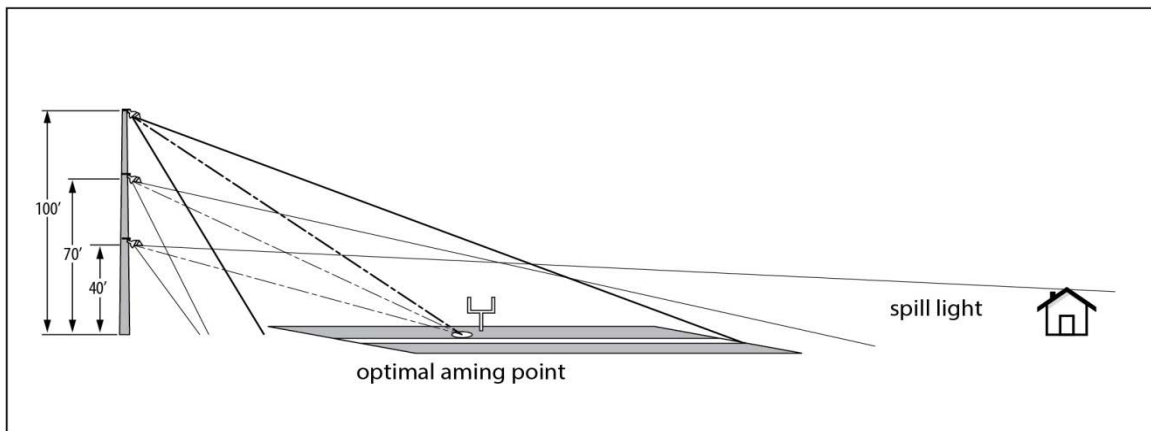
- **Fully Shielded.** A luminaire emitting no light above the horizontal plane.
- **Shielded.** A luminaire emitting less than 2 percent of its light above the horizontal plane.
- **Partly Shielded.** A luminaire emitting less than 10 percent of its light above the horizontal plane.
- **Unshielded.** A luminaire that may emit light in any direction.

Light trespass means light that falls beyond the property on which it originates. The amount of trespass is expressed in foot-candles and is measured in the vertical plane at five feet above grade at the property line of the site on which the light(s) is located. If the adjacent property is a street, alley, or sidewalk, the point at which trespassing light is measured is the center of the street, alley, sidewalk, or right-of-way. Field measurements to determine light trespass compliance do not include the effect of light produced by streetlights.

As a general rule, taller poles allow fixtures to be aimed more directly on the playing surface, which reduce the amount of light spilling into surrounding areas. Proper fixture angles ensure even light distribution across the playing area and reduce spill light, as shown in Exhibit B, *Pole Heights and Lighting Angles*.

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Exhibit B: Pole Heights and Lighting Angles



Sky Glow is light that reflects into the night sky and reduces visibility of the sky and stars. It is a concern in many jurisdictions, especially those with observations.

Section 20.300.080, Light and Glare Standards, of the San Marcos Municipal Code, is intended to provide safety at entryways, along walkways, between buildings, and within parking areas. This Section includes general standards, such as shielding or directing lighting away from adjacent residential uses and property perimeter lighting not exceeding 0.5 fc at any point along the property line of the subject or adjacent parcel.

Some of the design elements for light control and reduced spill lighting impact include mounting height and steep aiming angles, various lighting modes, visors and shielding, reflective housing around the lamp, number of lamps, and appropriate light levels. Higher poles could increase off-site glare, and shorter poles could increase off-site spill light and detrimentally affect lighting levels and performance. The proposed lighting poles incorporate all these elements, and each element can be arranged individually to control and minimize any potential spill lighting impacts. Each light assembly would be adjusted, and additional shields would be installed as necessary to ensure that light levels at the sensitive receptors do not exceed the light threshold and to reduce sky glow impacts. For the purposes of this analysis, the District's standard of 0.8 fc was used for a significance determination because 0.8 fc is twilight light levels. It should also be noted that school districts can exempt educational facilities from a jurisdiction's zoning ordinance; the District has exempted its school projects from the City of San Marcos' zoning ordinance.

Figure 4, *Proposed Field Lighting Locations*, shows the locations of the proposed four light poles on the project site; two poles (F2 and F3) would be located closest to the campus' boundary. Figure 6, *Horizontal Spill Light Levels*, and Figure 7, *Vertical Spill Light Levels*, show the lighting level at the property line, and the illustration summary box in the Figures highlights the scan average. The numbers shown are projected maximum horizontal and vertical footcandles, which range from 0.0 to 0.37 fc, and 0.0 to 0.67 fc, respectively. Therefore, the projected light levels do not exceed the 0.8 fc District standard. The LED luminaires would be shielded and directed downward and away from the adjacent sensitive uses and public rights-of-way so that glare impacts are minimized, as shown in Figure 8, *Lighting Simulations – Richland Road (Looking East)*, Figure 9, *Lighting Simulations*

3. Environmental Analysis

– *Richland Road (Looking West)*, and Figure 10, *Lighting Simulations – Rock Springs Road (Looking South)* Additionally, landscaping along Richland Road would further reduce impacts. As such, spill light and glare impacts to the adjacent sensitive uses 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

Figure 6 - Horizontal Spill Light Levels



Mission Hills High School Recreation Field

San Marcos, CA

Grid Summary	
Name	Spill @ 3ft.
Spacing	30.0'
Height	3.0' above grade

Illumination Summary	
INITIAL HORIZONTAL FOOTCANDLES	
Entire Grid	0.0612
Scan Average	0.37
Maximum	0.00
Minimum	0.00
CU	0.00
No. of Points	43
LUMINAIRE INFORMATION	
Applied Circuits	A,B
No. of Luminaires	16
Total Load	21.12 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

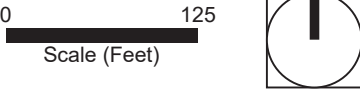
Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.

Equipment List For Areas Shown								
Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
2	F1	70'	-	70'	TLC-LED-1200	1	1	0
	F4			70'	TLC-LED-1500	3	3	0
2	F2-F3	70'	-	70'	TLC-LED-1200	2	2	0
				70'	TLC-LED-1500	2	2	0
4	Totals					16	16	0

Pole location(s) ⓧ dimensions are relative to 0,0 reference point(s) ⊗

Mission Hills High School Boundary
Multi-Purpose Field
fc Values greater than 0.0

Source: MUSCO 2025.



3. Environmental Analysis

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Figure 7 - Vertical Spill Light Levels



Mission Hills High School Recreation Field

San Marcos, CA

Grid Summary	
Name	Spill @ 5ft.
Spacing	30.0'
Height	5.0' above grade

Illumination Summary	
INITIAL MAX VERTICAL FOOTCANDLES	
Scan Average	0.1131
Maximum	0.67
Minimum	0.00
CU	0.00
No. of Points	43
LUMINAIRE INFORMATION	
Applied Circuits	A,B
No. of Luminaires	16
Total Load	21.12 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

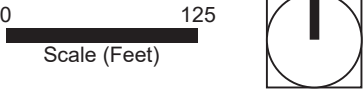
Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.

Equipment List For Areas Shown								
Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
2	F1 F4	70'	-	70'	TLC-LED-1200	1	1	0
				70'	TLC-LED-1500	3	3	0
2	F2-F3	70'	-	70'	TLC-LED-1200	2	2	0
				70'	TLC-LED-1500	2	2	0
4	Totals					16	16	0

Pole location(s) Ⓢ dimensions are relative to 0,0 reference point(s) ⊗

Mission Hills High School Boundary
Multi-Purpose Field
fc Values greater than 0.0

Source: MUSCO 2025.



3. Environmental Analysis

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Figure 8 - Lighting Simulations – Richland Road (Looking East)



① Existing Day



① Proposed Day

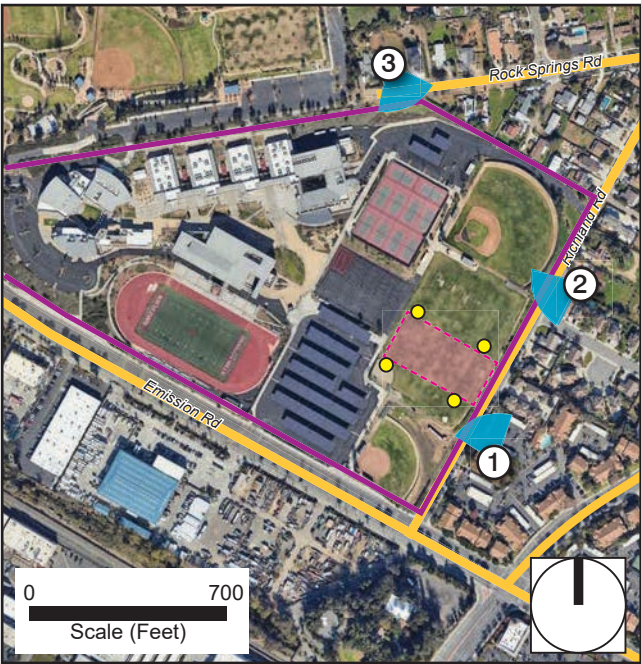


① Existing Night



① Proposed Night

Photograph Location and Direction
Key Map



- Mission Hills High School Boundary
- ① Photograph Location and Direction
- Multi-Purpose Field
- Light Pole Locations (4)

3. Environmental Analysis

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Figure 9 - Lighting Simulations – Richland Road (Looking West)



② Existing Day



② Proposed Day

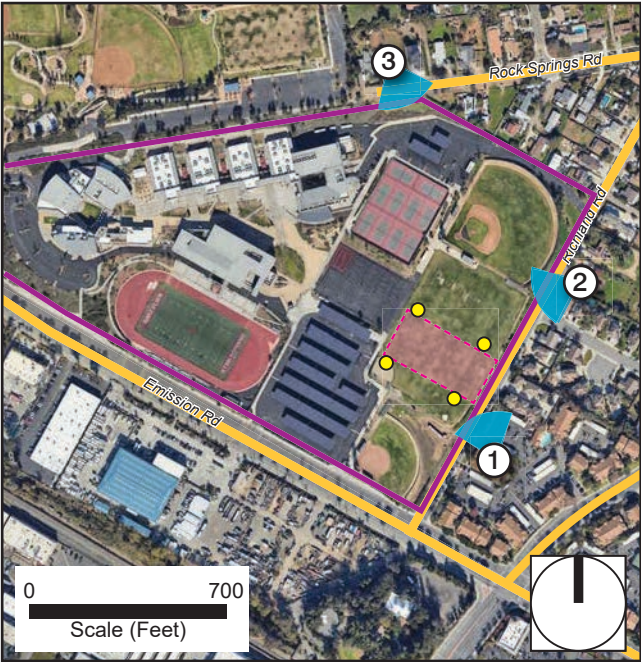


② Existing Night



② Proposed Night

Photograph Location and Direction
Key Map



- Mission Hills High School Boundary
- ② Photograph Location and Direction
- Multi-Purpose Field
- Light Pole Locations (4)

3. Environmental Analysis

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Figure 10 - Lighting Simulations – Rock Springs Road (Looking South)



③ Existing Day



③ Proposed Day

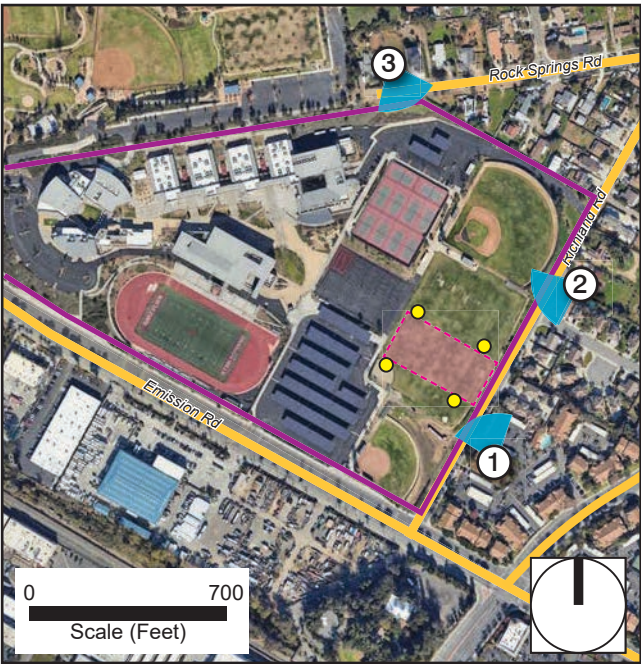


③ Existing Night



③ Proposed Night

Photograph Location and Direction
Key Map



- Mission Hills High School Boundary
- ③ Photograph Location and Direction
- Multi-Purpose Field
- Light Pole Locations (4)

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- 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. According to the California Important Farmland Finder, the project site is mapped as “Urban and Built-Up Land” and is surrounded by urbanized land (CDC 2022). The proposed project would occur within the project site boundary and would not convert farmland to non-farmland uses. Therefore, no impact would occur.

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

No Impact. There are no Williamson Act contracts onsite (CDC 2025a). The campus is zoned Public-Institutional (P-I) and would continue to operate as a school upon project implementation. The project site is surrounded by urbanized uses. Therefore, no impacts 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 occur within the boundaries of the existing Mission Hills High School campus. The campus is zoned Public-Institutional (P-I), and therefore, would not conflict with existing zoning for forestland or timberland, as none exist on the campus or surrounding areas. Therefore, no impact would occur.

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

No Impact. The proposed project would occur within the boundaries of the existing Mission Hills High School campus which is surrounded by urbanized uses. No forestlands exist onsite or within the project vicinity. Therefore, implementation of the proposed project would not result in the conversion of forestland to non-forest uses. Therefore, no impacts 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 proposed project would occur within the boundaries of the existing Mission Hills High School campus which is located within an urbanized area. There are no forestlands or agricultural uses onsite. The proposed project would not result in the conversion or loss of forestlands or agricultural uses to non-forestlands or non-agricultural uses. Therefore, no impact would occur.

3.3 AIR QUALITY

The Air Quality section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthy pollutant concentrations. The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O₃), carbon

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monoxide (CO), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead (Pb). Areas are classified under the federal and California Clean Air Act as in either attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The San Diego Air Basin (SDAB), which is managed by the San Diego County Air Pollution Control District (SDAPCD), is designated under the California AAQS as a nonattainment area for PM₁₀ and PM_{2.5} and designated under both the California AAQS and the Federal AAQS as nonattainment for O₃ (SDAPCD 2023).

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

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

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

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

Less Than Significant Impact. A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the San Diego Regional Air Quality Strategy (RAQS). The most current RAQS is the 2022 RAQS (SDAPCD 2022). The RAQS fulfills the CEQA goal of informing decision-makers of the environmental effects of the project under consideration at a stage early enough to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to clean air goals contained in the RAQS. Only new or amended general plan elements, specific plans, and major projects need to undergo a consistency review. This is because the RAQS is based on projections from local general plans. Projects that are consistent with the local general plan or do not trigger the San Diego Association of Government's (SANDAG) intergovernmental review criteria are considered consistent with the RAQS.

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The proposed project would include replacing the natural turf with synthetic turf and installing permanent non-directional lighting to replace the temporary lighting at the existing multi-purpose field. The proposed project would also include resurfacing the existing stadium and tennis courts, and removing two existing tennis courts and replacing them with three volleyball courts. No new permanent buildings would be developed, and no increase in student or staff capacity would occur upon implementation of the proposed lighting installation.

As such, the proposed project would not substantially affect housing, employment, and population projections within the San Diego region, which is the basis of the RAQS projections. The proposed project is in the City of San Marcos and would be subject to the County of San Diego thresholds under the SDAPCD. Projects whose stationary source emissions do not exceed the San Diego County screening-level emission thresholds would not be considered to violate an air quality standard or contribute substantially to an existing or projected air quality violation. As discussed below in Impact 3.3(b), project-related operation emissions would not be at levels that would exceed the San Diego County screening-level thresholds. Therefore, the proposed project would not conflict or obstruct implementation of the RAQS and impacts are 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. The SDAB is designated under the California and Federal AAQS as nonattainment for O₃ (8-hour) and under the California AAQS as nonattainment for PM₁₀ and PM_{2.5} (SDACPD 2025). Any project that produces a significant project-level regional air quality impact in an area that is in nonattainment adds to the cumulative impact. Air quality impacts of the proposed project were evaluated based on the San Diego County significance thresholds. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. The following describes project-related impacts from short-term construction activities and long-term operation of the project.

Short-Term Air Quality Impacts

Construction activities would result in the generation of air pollutants. These emissions would primarily be 1) exhaust emissions from powered construction equipment; 2) dust generated by soil transport and other construction activities; and 3) motor vehicle emissions.

Construction would involve activities such as asphalt demolition, site preparation, grading, soil haul, and field lighting installation. Construction activities are anticipated to start in June 2025 and end by October 2025 (4 months). Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1, based on the project's preliminary construction schedule. Results of the modeling are included in Table 2, *Maximum Daily and Annual Regional Construction Emissions*.

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Table 2 Maximum Daily and Annual Regional Construction Emissions

Construction Phase	Pollutants (lbs./day) ^{1, 2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Demolition, Demolition Debris Haul, & Demolition Debris Reprocessing Overlap	3	30	30	<1	3	1
Demolition Debris Haul, Demolition Debris Reprocessing, & Site Preparation Overlap	4	39	40	<1	13	6
Demolition Debris Haul & Site Preparation Overlap	4	35	34	<1	13	6
Demolition Debris Haul, Grading, & Grading Soil Haul Overlap	2	27	26	<1	9	3
Grading Soil Haul, Construction, & Field Lighting Installation Overlap	4	35	25	<1	4	2
Construction & Field Lighting Installation Overlap	3	28	20	<1	2	2
Construction	3	24	17	<1	2	2
Paving & Coating Overlap	19	8	12	<1	1	<1
Maximum Daily Emissions (lbs/day)	19	39	40	<1	13	6
County of San Diego Screening-Level Thresholds	75	250	550	250	100	55
Significant?	No	No	No	No	No	No
Annual Emissions						
Construction Year	Pollutants (tons per year) ^{1, 2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2025	<1	1	1	<1	<1	<1
County of San Diego Screening-Level Thresholds	13.7	40	100	40	15	10
Significant?	No	No	No	No	No	No

Source: CalEEMod, Version 2022.1.1.29, San Diego 2007.

Notes:

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

² Includes implementation of fugitive dust control measures required by SDAPCD under Rule 55, including watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, and street sweeping.

As shown in the Table, air pollutant emissions from project-related construction activities would not exceed the County's screening-level emissions thresholds. Therefore, air quality impacts from project-related construction activities would be less than significant.

Long-Term Operation-Related Impacts

Typical long-term air pollutant emissions generated by a land use would be generated by area sources (e.g., landscape fuel use, aerosols, and architectural coatings), mobile sources from vehicle trips, and energy use (natural gas) associated with the land use. The proposed project would result in permanent lighting installation of the school multi-purpose field, which would be electric-powered and not generate criteria air pollutant emissions. In addition to the permanent field lighting, the proposed project would also result in changes to the athletic programming. Currently, the existing 20 tennis matches generate approximately 20 spectators; however, with the reduction in tennis courts, the number of spectators is estimated to be 14-16. The proposed volleyball courts would result in 20 games per year, which are expected to have between 2 to 8 spectators per game. On a worst-case day basis, volleyball games would not generate more vehicle trips than what is currently generated

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by the existing sporting events and activities in the project area. Therefore, on an annual basis, the proposed project, when accounting for the anticipated decrease in tennis attendance, could result in a net change in sporting events attendance at the project site ranging from a decrease of 80 spectators per year to an increase of 80 spectators per year. However, the potential increase in the number of spectators and new vehicle trips per year would still be low and project generated mobile-source emissions would be minimal. Additionally, any potential increase would be considered negligible because most of these spectators would likely be students, families, and community members who already live in the area and contribute to the existing traffic. Overall, in consideration of these factors, any net increases in criteria air pollutants from operation of the proposed project would be nominal and would not exceed the San Diego County screening-level thresholds. Therefore, impacts to the regional air quality associated with operation of the project would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

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

Localized Impacts

Pursuant to the County of San Diego's *Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality* (San Diego 2007), a project whose stationary source emissions do not exceed or can be mitigated to less than the screening-level thresholds outlined in SDAPCD Rule 20.2 would not be considered to violate an air quality standard or contribute substantially to an existing or projected air quality violation. Projects that exceed these thresholds would be required to conduct an air quality impact analysis to determine the concentrations of stationary emissions at nearby sensitive receptors. As identified above, onsite construction and operation of the proposed project would be substantially below the County's thresholds; and therefore, localized emissions are also less than significant.

CO Hotspots

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

Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (BAAQMD 2023). The proposed project would introduce volleyball games that are anticipated to have 2 to 8 spectators per game, which could potentially result in a nominal increase in vehicle trips. Additionally, on a worst-case game day basis, the proposed volleyball games would not generate more trips than what is currently generated by the existing

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sporting events and activities in the project area. The 24-hour average daily traffic (ADT) counts along the segment of Mission Road between Woodward Street and Bennett Avenue range between 16,858 to 23,546 ADTs and between 14,761 to 18,473 ADTs along the segment of Woodland Parkway between Rock Springs Road and Rancheros Drive (San Marcos 2025). Because the ADT counts are based on a 24-hour count, the trips that occur in the peak hour along these segments would be fewer. Overall, based on the available traffic counts data and the anticipated limited number of new daily vehicle trips, the proposed project would not result in the requisite number of peak hour traffic volumes that could result in a CO hotspot. In addition, the potential for CO hotspots to be generated in the SDAB is extremely unlikely because of the improvements in vehicle emission rates and control efficiencies. Therefore, impacts would be less than significant.

Health Risk

Construction

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

Operation

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

The proposed project would include replacing the natural turf with synthetic turf and installing permanent non-directional lighting to replace the temporary lighting at the existing multi-purpose field. The proposed project would also include resurfacing the existing stadium and tennis courts, and removing two existing tennis courts and replacing them with three volleyball courts. The proposed project would not include uses typically associated with generating substantial stationary sources of emissions. The multi-purpose field lighting would only generate a nominal increase in electricity demand and would not directly generate criteria pollutants.

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Therefore, the proposed project would not expose receptors to substantial concentrations of criteria air pollutants, operational criteria air pollutant emissions would not exceed the California AAQS, and impacts 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 proposed project would not result in objectionable odors. The threshold for odor is if a project creates an odor nuisance pursuant to SDAPCD Rule 51, Nuisance, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations in the growing of crops or raising of fowls or animals.

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 would not fall within the objectionable odors land uses or generate odors different than what is already generated onsite. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be low in concentration, temporary, and would not affect a substantial number of people. Odor impacts 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

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Special status species include those listed as endangered or threatened under the federal Endangered Species Act or California Endangered Species Act, species otherwise given certain designations by the California Department of Fish and Wildlife, and plant species listed as rare by the California Native Plant Society. The areas to be disturbed by the proposed project are already developed as an existing school. According to Figure 4-1, Vegetation Communities, and Figure 4-3, Open Space Areas, of the Conservation and Open Space Element of the City's General Plan, the Mission Hills Campus does not contain, nor is surrounded, by sensitive plant species or open space (San Marcos 2012a). The campus and surrounding area are built-out and urbanized; the frequent disturbances onsite and in the surrounding area would not make the campus a suitable location for sensitive plant or animal species. The area to be disturbed by the proposed project is already developed and frequent activities occur onsite (students playing, maintenance, etc.), as such, there is no suitable breeding or foraging habitat onsite for any sensitive species. 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. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, that are known to provide habitat for sensitive animal or plant species, or are known to be important wildlife corridors. Riparian habitats are those occurring along the banks of rivers and streams. There are no riparian lands mapped onsite (USFWS 2023). The proposed improvements would occur within the limits

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of the existing school campus. The project site does not contain any sensitive natural community or riparian habitat. Therefore, no impact 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?**

Less Than Significant Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands includes areas such as swamps, marshes, and bogs. There is a freshwater emergent wetland mapped onsite that traverses from the northeastern portion of the site to the southwestern portion of the site (USFWS 2023). However, the campus is developed, and the areas where the freshwater emergent wetland traverse include the baseball and multi-purpose fields, football stadium, and parking lot. Therefore, impacts would be less than significant.

- 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. According to Figure 4-2, Wildlife Corridor and Linkage, of the City's General Plan, there are no wildlife corridors or linkages within the campus. The proposed project would make improvements to the existing campus which is already disturbed, and does not provide connection for wildlife populations. The proposed project would not remove any trees, which can be used by migratory birds. Therefore, no impact would occur.

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

No Impact. The proposed project would not require removal of any trees. No impact would occur.

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

No Impact. The proposed project would make improvements to the existing campus which is already developed. The proposed project would not conflict with the provisions of a habitat conservation plan or natural community conservation plan. No impact would occur.

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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 campus is not listed as a historical resource in the National Register of Historic Places or California Historical Resources (NPS 2020; OHP 2023). The proposed project would not demolish any structures that can potentially meet any of the criteria listed above. Therefore, there are no resources on the campus that would be considered “historically significant.” No impact would occur.

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

Less Than Significant Impact With Mitigation Incorporated. Implementation of the proposed project would result in limited soil disturbance to implement the proposed project; soil disturbance would occur in areas already developed. Therefore, the potential discovery of archaeological resources would be minimal. However, if any buried resources are unearthed during any of the ground-disturbing activities, a customary caution and a halt-work would be required to ensure that adverse impacts to archaeological resources do not

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occur. Mitigation Measure CUL-1 requires that if any evidence of cultural resources is discovered, all work within the vicinity of the find will stop until a qualified archaeological consultant can assess the find and make recommendations. Therefore, impacts to archaeological resources would be reduced to a less than significant impact with mitigation.

Mitigation Measures

CUL-1 If cultural resources are encountered during ground-disturbing activities, work in the immediate area shall cease, and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find(s). If resources of Native American origin are encountered, the Rincon Band of Luiseno Indians is to be notified within 48 hours to assess and determine significance of the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted and will be reported to the San Marcos Unified School District. Any data recovery plan is to be consulted on with the Rincon Band of Luiseno Indians, and a Rincon Native American monitor shall be present during the archaeological investigation.

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

Less Than Significant Impact. In the unlikely event that human remains are uncovered during project construction, Government Code Sections 27460 et seq. mandate that there shall be no further excavation or soil disturbance until the County coroner has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death, and the required recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in PRC Section 5097.98.

Pursuant to California Health and Safety Code Section 7050.5, the coroner shall make his or her determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and has reasons to believe that they are those of a Native American, he or she shall contact the Native American Heritage Commission within 24 hours. Compliance with existing regulations would ensure that impacts to human remains would be less than significant.

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3.6 ENERGY

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 from construction activities associated with the construction and operation of the proposed project.

Short-Term Construction Impacts

Electrical Energy

Construction of the proposed project would not require electricity to power most construction equipment. Electricity use during construction would vary during different phases of construction. The majority of equipment during construction of the proposed project would be gas- or diesel-powered, and electricity would not be used to power most of the construction equipment. Later construction phases could result in the use of electricity-powered equipment for interior construction and architectural coatings. It is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws) and lighting, which would result in minimal electricity usage during construction activities. Therefore, project-related construction activities would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant.

Natural Gas Energy

It is not anticipated that construction equipment used for the proposed project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, impacts would be less than significant with respect to natural gas usage.

Transportation Energy

Transportation energy use during construction of the proposed project would come from delivery vehicles, haul trucks, and construction employee vehicles. In addition, transportation energy demand would come from use of off-road construction equipment. It is anticipated that the majority of off-road construction equipment,

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such as those used during site preparation, soil haul, and field installation, would be gas- or diesel-powered. The use of energy resources by these vehicles would fluctuate according to the phase of construction.

The use of energy resources by vehicles and equipment would fluctuate according to the phase of construction and would be temporary. In addition, all construction equipment would cease operating upon completion of project construction. Therefore, impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure. Moreover, to limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. Construction trips would also not result in unnecessary use of energy since the project site is centrally located and is served by numerous regional freeway systems (e.g., I-15 and SR-78) that provide the most direct routes from various areas of the region. Therefore, energy use during construction of the project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant.

Long-Term Impacts During Operation

Operation of the proposed project would generate new demand for electricity on the project site. Operational use of energy would include permanent field lighting.

Electrical Energy

The proposed net increase in electricity consumption from the proposed project is shown in Table 3, *Net Operation-Related Electricity Consumption*.

Table 3 Net Operation-Related Electricity Consumption

Land Use	Electricity (kWh/year)
Field Lighting	17,542
Source: See Appendix B. Note: kWh=kilowatt-hour	

Electrical service to the campus would continue to be provided by San Diego Gas & Electric (SDGE) through connections to existing off-site electrical lines as needed. The proposed project would add permanent light poles to the existing multi-purpose field. As shown in the table, the new electricity demand from field lighting would be 17,542 kilowatt-hours per year. The new permanent lighting would use LED lights and would only be operated during the evening. Therefore, operation of the field lights would not result in wasteful, inefficient, or unnecessary electricity demands. Therefore, operation of the field lights would result in a less than significant impact related to electricity.

Natural Gas Energy

The proposed project would involve installation of field lighting, which would not generate demand for natural gas. Therefore, operation of the field lights would have no impact with respect to natural gas usage.

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Transportation Energy

The proposed project could potentially result in a net change of annual spectators per year ranging from a decrease of 80 spectators per year to an increase of 80 spectators per year due to the addition of volleyball games to the sports programming and the anticipated decrease in spectators for tennis games. A net increase in annual spectators would result in new vehicle trips, although any increases in vehicle trips would be low due to the low maximum number of new spectators that could be introduced. Additionally, any potential increase would be considered negligible because most of these spectators would likely be students, families, and community members who already live in the area and contribute to the existing traffic. Furthermore, as discussed in Impact 3.17(b) of this IS/MND, the proposed project would result in less than significant VMT impacts. Therefore, 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?

Less Than Significant 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—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, Governor Brown signed SB 100, which supersedes the SB 350 requirements. Under SB 100, the RPS for public owned facilities and retail sellers consist of 50 percent by 2026, 52 percent by 2027, and 60 percent by 2030. The bill also established a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Additionally, SB 1020 adds interim targets to SB 100 framework to require renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent of all retail electricity sales by 2040. Under SB 100 and SB 1020 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 requirements do not directly apply to individual development projects, but to utilities and energy providers such as SDGE, whose compliance with RPS requirements would contribute to the state objective of transitioning to renewable energy. Therefore, implementation of the proposed project would not conflict with or obstruct implementation of California's RPS Program and impacts would be less than significant.

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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. The Alquist-Priolo Earthquake Fault Zoning Act was signed into California law in 1972 to reduce losses from surface fault rupture. California created this law following the destructive 1971 San Fernando earthquake (magnitude 6.6), which was associated with extensive surface fault ruptures that damaged numerous structures.

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Alquist-Priolo earthquake fault zones are regulatory zones surrounding the surface traces of active faults in California.¹ Wherever an active fault exists, if it has the potential for surface rupture, a structure for human occupancy cannot be placed over the fault and must be a minimum distance from the fault (generally 50 feet). An active fault, for the purposes of the Alquist-Priolo Act, is one that has ruptured in the last 11,000 years (CDC 2025b).

There are no Alquist-Priolo fault zones on or adjacent to the campus (CDC 2023c). The proposed improvements would be installed in accordance with the applicable California Building Code (CBC) and Division of the State Architect (DSA) criteria for seismic safety which would reduce potential seismic-related impacts. Therefore, impacts would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. According to the California Department of Conservation, no fault zones traverse the campus (CDC 2015). Considering the seismic history of the region, the proposed project would be designed in compliance with seismic requirements of the CBC and DSA criteria for seismic safety. Compliance with established standards would reduce the risk of structural collapse or other shaking-related hazards to a less than significant level.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. According to Figure 6-1, Geologic Hazards – Soil Slippage Susceptibility (Landslides/Liquefaction) of the Safety Element of the General Plan, the campus has a low susceptibility to liquefaction; liquefaction-prone areas include the northern Twin Oaks Valley area, southern San Marcos Creek, and the drainage area south of Palomar Community College) (San Marcos 2012b). Nonetheless, the proposed project would be designed in compliance with seismic requirements of the CBC and DSA criteria for seismic safety, including from liquefaction impacts. Therefore, impacts would be less than significant.

iv) Landslides?

Less Than Significant Impact. Landslides are a type of erosion in which masses of earth and rock move downslope as a single unit. Susceptibility of slopes to landslides and lurching (earth movement at right angles to a cliff or steep slope during ground shaking) depend on several factors that are usually present in combination—steep slopes, condition of rock and soil materials, presence of water, formational contacts, geologic shear zones, and seismic activity. The campus and adjacent properties are flat and exhibit no unusual geographic features or slopes. According to Figure 6-1, Geologic Hazards – Soil Slippage Susceptibility (Landslide/Liquefaction) of the Safety Element of the General Plan, the campus has a low

¹ A trace is a line on the earth's surface defining a fault.

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susceptibility to landslides (San Marcos 2012b). The proposed project would be designed in compliance with seismic requirements of the CBC and DSA criteria for seismic safety, and the proposed project would not result in significant safety impacts due to landslides. Impacts would be less than significant.

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 campus is developed with school buildings and facilities. Implementation of the proposed project would require limited softscape and hardscape demolition to drill holes for the installation of the light poles, trenching for the utilities, and resurfacing the sports facilities. As the campus is already developed, and ground disturbance would be limited, the proposed project would not result in substantial soil erosion or the loss of topsoil. The proposed project would comply with the requirements of the CBC and DSA, and implement best management practices (BMPs) to reduce erosion. Impacts would be less than significant.

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

Less Than Significant Impact. As discussed in Impacts 3.7.a.iii and 3.7.a.iv, impacts from liquefaction and landslides would be less than significant given the low susceptibility of these geologic hazards onsite. Additionally, the proposed project would be installed in compliance with the applicable requirements of the CBC and DSA.

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 campus is generally flat. Therefore, impacts from lateral spreading would be less than significant.

Subsidence and collapse are generally due to substantial overdraft of groundwater or underground petroleum reserves. 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 City of San Marcos and the campus are not in areas of recorded subsidence due to groundwater pumping (USGS 2023). The proposed project would be constructed in compliance with the applicable CBC and DSA requirements. Therefore, potential impacts related to subsidence and collapsible soil would be reduced to a less than significant level.

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. Highly expansive soils swell when they absorb and shrink as they dry, and can cause structural damage to building foundations. Therefore, they are less suitable for development than

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nonexpansive soils. The soils on campus are Huerhuero loam and Escondido very fine sandy loam; these soils are moderately well-drained and well-drained, respectively (UCDavis 2025). Moreover, the proposed project would be constructed in compliance with the applicable CBC and DSA requirements. Therefore, potential impacts related to expansive soils 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 use any septic tanks or alternative wastewater disposal system. No impact would occur.

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

Less Than Significant Impact With Mitigation Incorporated. Paleontological resources or fossils are the remains of ancient plants and animals that can provide scientifically significant information about the history of life on earth. Paleontological “sensitivity” is defined as the potential for a geologic unit to produce scientifically significant fossils. The sensitivity is determined by rock type, history of the geologic unit in producing significant fossils, and fossil localities that are recorded from that unit. The campus is anticipated to be underlain by Metasedimentary and metavolcanic rocks undivided (Mesozoic) (Mzu), which is described as a wide variety of low- to high-metamorphic grade metavolcanic and metasedimentary rocks that are mostly volcanoclastic breccia and metaandesitic flows, tuffs, and tuff-breccia (CDC 2007a; CDC 2007b). As such, the paleontological sensitivity would be considered low.

Additionally, implementation of the proposed project would not require extensive grading or excavation, and no unique geologic features would be impacted. However, as ground-disturbing activities would occur, there is the potential for discovering paleontological resources if the proposed project disturbs soils beyond previously disturbed artificial fill and the underlain sediments are deposits with some potential for discovery of paleontological resources. Therefore, Mitigation Measure GEO-1, which requires a paleontologist to be on call in the event that paleontological resources are discovered, has been incorporated to reduce impacts to a less than significant level.

Mitigation Measures

GEO-1 A qualified paleontologist shall be on call in the event that paleontological resources are found during ground-disturbing activities. The paleontologist shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossils. The paleontologist shall be empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner.

3.8 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source

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of GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.²

Information on manufacture of cement, steel, and other “life cycle” emissions that would occur as a result of the project are not applicable and are not included in the analysis.³ 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 Senate Bill 32 (SB 32) inventory and treats this short-lived climate pollutant separately.⁴ A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix B, *Air Quality and Greenhouse Gas Modeling*, to this Initial Study

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

² Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

³ Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (CNRA 2018). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

⁴ Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, Air Quality. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017).

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a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Annual average construction emissions were amortized over 20 years to reflect estimated operational lifetime (SBTF 2003). Implementation of the proposed project would result in the installation and operation of four permanent light poles (16 lamps total) for the existing multi-purpose field. In addition, the proposed changes to the sports programming (i.e., introduction of volleyball games) could result in a net increase of 80 additional spectators per year, which would generate new vehicle trips. However, there would not be an increase in water demand, wastewater and solid waste generation, area sources (e.g., consumer cleaning products), or refrigerants as the proposed project would not increase student or staff capacity. As shown in Table 4, *Project-Related Operation GHG Emissions*, the estimated net change in GHG emissions resulting from implementation of the proposed project would be 13 metric tons of carbon dioxide equivalent (MTCO_{2e}) per year and would not exceed the bright-line threshold of 900 MTCO_{2e} per year.

Furthermore, the CARB 2022 Scoping Plan includes three priority areas consisting of zero-emission transportation, vehicle miles traveled (VMT) reduction, and building decarbonization (CARB 2022). Consistency with the three priority areas include compliance with the Tier 2 voluntary electric vehicle parking standards of the California Green Building Standards Code (CALGreen), a less than significant VMT impact as it pertains to Senate Bill 743, and no natural gas connections or onsite use of propane or other fossil fuels, respectively. Per the 2022 Scoping Plan, these three priority areas cover the State's largest sources of emissions over which local governments have authority and where consistency of land use development projects to these three priority areas would support the State's climate goals. Overall, the proposed project would not include new parking or renovation of existing parking, nor would it result in the construction of any buildings. Therefore, the zero-emission transportation and building decarbonization priority areas would not apply. Additionally, as discussed in Impact 3.17(b) of this IS/MND, the proposed project would result in less than significant VMT impacts. Therefore, GHG emissions generated by the project are considered less than significant and no mitigation measures are required.

Table 4 Project-Related Operation GHG Emissions

Source	GHG (MTCO _{2e} /Year)
Field Lighting Energy	5
Mobile Sources ¹	<1
Amortized Construction Emissions ²	8
Total	13
GHG Bright-Line Threshold ³	900 MTCO _{2e} /Yr
Exceeds Bright-Line Threshold?	No

Source: CalEEMod, Version 2022.1.1.29. Totals may not equal to the sum of the values as shown due to rounding.

Notes: metric tons; MTCO_{2e}: metric ton of carbon dioxide equivalent

¹ For purposes of this analysis, it is assumed each spectator would generate 2 one-way vehicle trips for a total of 160 one-way vehicle trips per year.

² Total construction emission are amortized over 20 years to represent a conservative estimate of building lifetime (SBTF 2003).

³ Based on CAPCOA's GHG bright-line threshold (CAPCOA 2008)

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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 the San Diego Association of Governments (SANDAG) San Diego Forward: The Regional Plan. A consistency analysis with these plans is presented below.

CARB 2022 Scoping Plan

CARB's latest Climate Change Scoping Plan (2022) outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279. The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Statewide strategies to reduce GHG emissions in the 2022 Climate Change Scoping Plan include: implementing SB 100, which expands the RPS to 60 percent by 2030; expanding the Low Carbon Fuel Standards (LCFS) to 18 percent by 2030; implementing the Mobile Source Strategy to deploy zero-electric vehicle buses and trucks; implementing the Sustainable Freight Action Plan; implementing the Short-Lived Climate Pollutant Reduction Strategy, which reduces methane and hydrofluorocarbons to 40 percent below 2013 levels by 2030 and black carbon emissions to 50 percent below 2013 levels by 2030; continuing to implement SB 375; creating a post-2020 Cap-and-Trade Program; and developing an Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the CAFE standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and CALGreen. The proposed project would comply with these GHG emissions reduction measures since they are statewide strategies. The proposed project's GHG emissions would be reduced from compliance with applicable provisions from these statewide measures that have been adopted since AB 32, SB 32, and AB 1279 were adopted. Therefore, impacts would be less than significant.

SANDAG's San Diego Forward: The Regional Plan

The California legislature passed Senate Bill 375 (SB 375) to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. SANDAG adopted the 2021 Regional Plan in December 2021 which includes the region's SCS along with the Regional Transportation Plan (RTP) and Regional Comprehensive Plan (RCP) (SANDAG 2021).

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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 make improvements to the existing sports facilities and would not change underlying zoning of or uses on the project site. Additionally, as discussed in Impact 3.17(b) of this IS/MND, the proposed project would result in less than significant VMT impacts. Therefore, the proposed project would not interfere with SANDAG's ability to implement the regional strategies outlined in the 2021 Regional Plan. The proposed project would not have the potential to interfere with the State of California's or SANDAG's ability to achieve GHG reduction goals and strategies. Therefore, impacts 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. The proposed project would require the use of hazardous materials during construction, however, such materials would be used, transported, and stored in compliance with all applicable

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local, state, and federal regulations. Similar to existing conditions, the District would use and store hazardous materials, such as custodial products, to maintain the campus, including the proposed improvements. As such, impacts would be less than significant.

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

Less Than Significant Impact. The proposed project would not create a significant hazard to the public or environment. The use, transport, and storage of hazardous materials during construction would be required to comply with all applicable regulations. The proposed improvements would occur in areas that are already developed and would not place students or the public any closer to existing hazardous conditions or materials. The use of hazardous materials during construction or operation of the proposed project is not anticipated to result in the release of hazardous materials. Less than significant impacts would occur.

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

Less Than Significant Impact. There are no schools within 0.25-mile of the project site. The proposed project would require the use of hazardous materials to construct and maintain the proposed improvements. However, the proposed project would not emit excessive hazardous emissions or involve substantial handling of hazardous materials, substances, or wastes. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. California Government Code Section 65962.5 requires the California Environmental Protection Agency to compile a list (updated at least annually) of hazardous waste and substances release sites, known as the Cortese List or California Superfund. Section 65962.5 requires compiling lists of the following types of hazardous materials sites: hazardous waste facilities, hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders, public drinking water wells containing detectable levels of organic contaminants, underground storage tanks with reported unauthorized releases, and solid waste disposal facilities from which hazardous waste has migrated. Four environmental lists were searched for hazardous materials sites on the project site.

- GeoTracker. State Water Resources Control Board (SWRCB 2025).
- EnviroStor. Department of Toxic Substances Control (DTSC 2025).
- EnviroMapper. US Environmental Protection Agency (USEPA 2025).
- Solid Waste Information System. California Department of Resources Recovery and Recycling (CalRecycle 2019).

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The campus is not listed on GeoTracker, EnviroMapper, and Solid Waste Information System. However, the campus is listed on EnviroStor due to the past agricultural uses onsite; a “No Further Action” was issued as of March 13, 2001 (DTSC 2025). The project site is already developed and used as a high school campus, and no active hazardous materials sites are listed within the project site. Therefore, the proposed project would not create a significant hazard to the public or the environment. Impacts would be less than significant.

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

No Impact. The nearest airport to the campus is the McClellan-Palomar Airport approximately 7 miles west. According to Figure 6-5, McClellan-Palomar Airport Areas of Influence, of the Safety Element in the General Plan, the majority of the City, including the campus, is within Review Area 2 (San Marcos 2012b). Given the distance of the airport, the proposed project would not interfere with inbound or outbound flights of any airport. Implementation of the proposed project would not result in safety hazards or excessive noise impacts for people residing or working in the project area. 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 occur within the existing high school boundaries, and operation of the proposed project would not impair or interfere with any existing vehicular or pedestrian emergency response or evacuation plan. All construction staging would be within the boundaries of the campus, and no off-site roadway or lane closure are anticipated. Therefore, 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 campus is not in a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2025). Furthermore, the proposed project would not change the existing boundaries of the campus, nor would it place students or facilities closer to wildfires. The campus is in an urbanized area. Impacts would be less than significant.

3.10 HYDROLOGY AND WATER QUALITY

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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:			X	
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. A significant impact would occur if the project discharges water that does not meet the quality standards of agencies that regulate surface water quality and discharges into the stormwater drainage system. During construction, water quality impacts could occur from discharge of soil through erosion, sediments, and other pollutants. The State Water Resources Control Board's National Pollutants Discharge Elimination System (NPDES) program regulates industrial pollutant discharges, including construction activities for sites larger than one acre. Because the proposed project would disturb more than one acre, the proposed project would be subject to the NPDES program, as well as prepare a stormwater pollution prevention plan (SWPPP) that requires the incorporation of BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. The NPDES requires that prior to the start of construction activities, the District must file permit registration documents (PRDs) with the State Water Resources Control Board (SWRCB), which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. The construction contractor is required to maintain a copy of the SWPPP onsite at all times and implement all construction BMPs identified in the SWPPP during construction activities. Prior to the start of grading activities, the District is required to provide proof of filing of the PRDs with the SWRCB, which include the preparation of the SWPPP. The SWPPP must describe construction BMPs that address pollutant source reduction and provide measures/controls to mitigate potential pollutant sources.

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The proposed project would not change the land use of the existing school thereby causing a violation of any water quality standards or waste discharge requirements. Long-term water quality impacts generally result from impervious surfaces (e.g., buildings, roads, parking lots, and walkways), which prevent water from soaking into the ground and can increase the concentration of pollutants in stormwater runoff, such as oil, fertilizers, pesticides, trash, soil, and animal waste. The proposed project would implement operational BMPs to control the amount and quality of the stormwater leaving the project site, such as employee training, sweeping parking lots, and providing storm drain system stenciling and signage.

With the compliance with applicable regulations and implementation of the BMPs, the proposed project would not violate any water quality standards or waste requirements, or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant.

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

No Impact. The campus is not used for intentional groundwater recharge, and the proposed project would not create additional demand for groundwater because it would make upgrades to the existing campus. The proposed project would not include new groundwater wells that would extract groundwater from the aquifer. Construction and operation of the proposed project would not lower the groundwater table or deplete groundwater supplies. Therefore, the proposed project would not interfere with groundwater recharge. No 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. Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed or dissolved, and moved from one place to another. Precipitation, running water, waves, and wind are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can greatly accelerate. This can create aesthetic as well as engineering problems on undeveloped sites. Accelerated erosion in an urban area can cause damage by undermining structures; blocked storm drains; and depositing silt, sand, or mud on roads and in tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life.

The campus is already developed as an existing school with sports facilities and landscaping that are subject to imperceptible urban erosion and siltation. As indicated in Impact 3.10(a), the proposed project would be required to submit PRDs and a SWPPP to the SWRCB for approval prior to the commencement of construction activities. The SWPPP would describe BMPs to reduce erosion and siltation. Therefore, impacts would be less than significant.

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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 campus is developed as an existing school with school buildings and sports facilities. The proposed project would not involve the alteration of any natural drainage or watercourse. The proposed project would result in a minor increase in impervious surfaces on the project site, and the majority of the project site would remain in its current state. Therefore, the amount of stormwater runoff would be similar to existing conditions. The proposed project would not substantially increase the rate or amount of surface runoff in a manner that would cause flooding on or off site. Therefore, impacts related to stormwater drainage and flooding 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 proposed project would not substantially increase the amount of impervious surfaces. The majority of the project site would remain in its current state. Therefore, the proposed project would generate stormwater similar to existing conditions. Stormwater that does not percolate into the ground would be directed to storm drains on campus and to surrounding storm drains in the public right-of-way. Construction and operation of the proposed project would be required to implement BMPs that would control the amount and quality of stormwater exiting the project site. The proposed project would not exceed the capacity of stormwater drainage systems and would not create substantial additional sources of polluted runoff. Impacts would be less than significant.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The western portion of the campus is located within a Letter of Map Revision (LOMR) zone, which is FEMA's modification to an effective Flood Insurance Rate Map (FIRM), or Flood Boundary and Floodway Map (FBFM), or both (FEMA 2012; FEMA 2025). The eastern portion of the campus is within Flood Zone X, area of minimal flood hazard (FEMA 2012). As discussed in Impact 3.10(c)(ii), the proposed project would not substantially increase the overall quantity of impervious areas or runoff speed, and any impacts on flooding would be negligible. The proposed project would not increase the flooding hazard at any of the existing school. The proposed project would not impede or redirect flood flows. Impacts would be less than significant.

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 water. According to Figure 6-3, FEMA Flood Hazards and Reservoir/Dam Inundation Zones, in the Safety Element of the General Plan, the campus is not within a dam inundation zone (San Marcos 2012b). No impact would occur.

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A tsunami is earthquake-induced flooding that is created from a large displacement of the ocean floor. The campus is approximately 10.6 miles east of the Pacific Ocean; therefore, the likelihood of a tsunami impacting the campus 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 impacts would occur.

In summary, the project site is not in flood hazard, tsunami, or seiche zones, and the proposed project would not release pollutants due to project inundation. No impact would occur.

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

No 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 not create substantial water quality impacts during construction and operation, and therefore would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impact would occur.

3.11 LAND USE AND PLANNING

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 proposed project would occur on an existing high school campus, and no community would be physically divided, as a result of the proposed improvements. Therefore, no impact would occur.

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

No Impact. The proposed project would occur on an existing high school campus. No land use changes would occur. The proposed project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.

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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. In 1975, the State legislature adopted the Surface Mining and Reclamation Act (SMARA). This designated Mineral Resources Zones that were of statewide or regional importance. The classifications used to define MRZs are:

- **MRZ-1:** Areas where the available geologic information indicates no significant mineral deposits or a minimal likelihood of significant mineral deposits.
- **MRZ-2:** Areas where the available geologic information indicates that there are significant mineral deposits or that there is a likelihood of significant mineral deposits.
- **MRZ-3:** Areas where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined.
- **MRZ-4:** Areas where there is not enough information available to determine the presence or absence of mineral deposits.

The California Department of Conservation Division of Geological Survey produces Mineral Land Classification studies that identify areas with potentially important mineral resources. The Department of Conservation Mineral Land Classification Map shows the campus is mapped within MRZ-1 and MRZ-3 (CDC 2017). Although the campus is in an area where mineral deposits may exist, the site is an existing campus and no mineral resources are being extracted. Implementation of the proposed project would not result in the loss of availability of a known mineral resource. No impact would occur.

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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 campus is within MRZ-1, which is an area where the available geologic information indicates no significant mineral deposits or a minimal likelihood of significant mineral deposits, and MRZ-3, which is an area where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined. The Conservation and Open Space Element of the General Plan indicates that there are no active mines or quarries in the City (San Marcos 2012a). The campus is developed with existing school buildings and facilities, and is surrounded by urban development. Implementation of the proposed project would not result in the loss of availability of a known mineral resource. No impact would occur.

3.13 NOISE

Environmental Setting

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, federal, state, and local 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. Noise monitoring was conducted in May 2023 and noise modeling was prepared by PlaceWorks in January 2025 which is summarized herein and included as Appendix C. Additional information on noise and vibration fundamentals and applicable regulations are contained in Appendix C.

Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. The City of San Marcos Plan Noise Element identifies residential uses (e.g., single- and multi-family, mobile homes), guest lodging, hospitals, nursing homes and other long-term medical care facilities, parks and outdoor recreational facilities, schools, libraries, churches, and places of public assembly as noise sensitive. There are sensitive receptors including residences to the north and to the east of the campus. The closest residences to the proposed construction activities at the multi-purpose field are the single-family homes approximately 125 feet east of the nearest proposed light pole installation along Richland Road. The closest residences to the center of proposed construction activities at the tennis courts are the single-family homes approximately 365 feet north along Rock Springs Road.

Ambient Noise Monitoring

Short Term

Three short-term (15-minute) measurement locations were selected and conducted around Mission Hills High School (project site). All measurements were conducted Thursday, May 25, 2023. All short-term measurements were conducted during the regular school hours.

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The short-term sound level meter used (Larson Davis LxT) for noise monitoring satisfies the American National Standards Institute (ANSI) standard for Type 1 instrumentation.⁵ The short-term sound level meter was set to “slow” response and “A” weighting (dBA). The meter was calibrated prior to and after each monitoring period. All measurements were at least 5 feet above the ground and away from reflective surfaces. Short-term measurement locations are described below and shown in Figure 11, *Approximate Noise Monitoring Locations*, and results are summarized in Table 5, *Short-term Noise Measurements*.

- **Short-Term Location 1 (ST-1)** was within the Mission Hills High School Boundary, adjacent to the residence at 404 Richland Road. The measurement location was located approximately 75 feet south of the residence. A 15-minute noise measurement began at 2:33 PM on Thursday, May 25, 2023. The noise environment is characterized primarily by cars passing by as well as students conversating along the sidewalks. Noise levels generally ranged around 48 dBA.
- **Short-Term Location 2 (ST-2)** was next to the residence at 305 Richland Road. A 15-minute noise measurement began at 1:02 PM on Thursday, May 25, 2023. The noise environment is characterized primarily by residential noise and bird chirping activity along the roadway as well as car passbys. Noise levels generally ranged from 55 dBA to 60 dBA.
- **Short-Term Location 3 (ST-3)** was along the multi-family residences at the Mission Park Condos south near the cross section of Richland and E Mission Road. A 15-minute noise measurement began at 1:25 PM on Thursday, May 25, 2023. The noise environment is characterized primarily by cars passing by as well as pedestrians and bikers talking. Noise levels generally ranged from 65 dBA to 70 dBA.

Table 5 Short-Term Noise Measurements Summary in A-weighted Sound Levels

Monitoring Location	Description	15-minute Noise Level, dBA						
		L _{eq}	L _{max}	L _{min}	L ₅₀	L ₂₅	L ₈	L ₂
ST-1	Within the Mission Hills High School Boundary, adjacent to the residence at 404 Richland Road 5/25/2023, 2:33 PM	47.7	48.0	47.5	47.7	47.8	47.9	48.0
ST-2	Next the residence at 305 Richland Road. 5/25/2023, 1:02 PM	58.3	75.9	44.0	48.5	52.0	63.1	68.9
ST-3	Along the multi-family residences at the Mission Park Condos south near the cross section of Richland and E Mission Road. 5/25/2023, 1:25 PM	72.2	90.3	53.9	63.9	68.9	74.1	82.0

Source: PlaceWorks 2023.

⁵ Monitoring of ambient noise was performed using Larson-Davis model LxT sound level meters.

3. Environmental Analysis

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, 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 sources or fixed-guideway sources. 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.

San Marcos Municipal Code Noise Ordinance

The City of Marcos Municipal Code includes noise regulations (referred to generally as the Noise Ordinance). Of the regulations within the municipal code, not all are applicable to the proposed project. The following regulations would apply to the proposed project:

Construction

Section 10.24.020 (b)(9) of the City Municipal Code identifies permissible hours for general construction activities. Excluding City holidays or on Sundays, construction may occur on weekdays from 7:00 AM to 6:00 PM or Saturdays from 8:00 AM to 5:00 PM. Grading is often the loudest phase of construction. Section 17.32.180 restricts grading and earthworks activities to between the hours of 7:00 AM and 4:30 PM., Monday through Friday.

Figure 11 - Approximate Noise Monitoring Locations



— Mission Hills High School Boundary

● ST-X

Short-Term Noise Measurement Locations (3)

— Multi-Purpose Field

Pole location(s) ⊕ dimensions are relative to 0,0 reference point(s) ⊗

Source: Nearmap, Inc. 2023.

0 230
Scale (Feet)



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General (Exterior) Noise Level Standards

Under Section 20.300.070 no person shall create any sound, or allow the creation of any sound, on any property that causes the exterior sound level on any other occupied property to exceed the sound level standards set forth in Table 20.300-4 (Table 2). Increases in allowable noise levels listed in Table 20.300-4 (Table 6, *Exterior Noise Standards by Zone*). Increases in allowable noise levels listed in Table 20.300-4 (see Table 6) may be permitted in accordance with the standards outlined in Table 20.300-5 (Table 7, *Permitted Increase in Noise Levels*).

Table 6 Exterior Noise Standards by Zone

Zone	Allowable Noise Level (dBA L _{eq}) Measured from the Property Line	
	7:00 AM to 10:00 PM	10:00 PM to 7:00 AM
Single-Family Residential	60	50
Multi-Family Residential	65	55

Source: San Marcos Municipal Code 2023.

Table 7 Permitted Increase in Noise Levels

Permitted Increase (dBA L _{eq})	Duration (cumulative minutes per hour)
5	15
10	5
15	1
20	Less than 1 minute

Source: San Marcos Municipal Code 2023.

Vibrations

Section 20.300.070(f) exempts certain activities which produce vibration which may annoy individuals. The ground vibration caused by moving vehicles, trains, aircraft, or temporary construction or demolition is exempted.

Federal Transit Administration

The City of San Marcos 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 used in this analysis (FTA 2013).

A vibration or construction noise 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) will be used to assess vibration damage to residences at the nearby sensitive receptors.

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- Project construction activities would generate noise levels greater than 80 dBA L_{eq} at the sensitive receptor property line or if noise from construction results in a decibel increase over 5 dB for construction activity that occurs longer than 15 minutes within any hour (as shown in Table 7).

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 with Mitigation Incorporated. Following is a discussion of the temporary and permanent noise impacts as a result of the proposed project's construction and operational phases.

Construction Noise

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

Construction Vehicles

The transport of workers and materials to and from the construction site would incrementally increase noise levels along site access roadways. Individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA L_{max} at 50 feet from the worker and vendor vehicles. However, these occurrences would generally be infrequent and last only a short period of time.

Based on CalEEMod methodology, worker, vendor, and haul trips would total a maximum of approximately 57 daily trips over a total of an 8-hour workday during soil haul. Given that the school would remain open the addition of 57 daily construction trips would result in a temporary noise increase of less than 0.5 dBA CNEL,

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which would not be substantial nor permanent. Therefore, construction-vehicle noise impacts would be considered less than significant.

Construction Equipment

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

The noise produced at each construction stage is determined by combining the L_{eq} contributions from each piece of equipment used at a given time, while accounting for the ongoing time-variations of noise emissions. Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA L_{max} at 50 feet. However, overall noise emissions vary considerably, depending on the specific activity performed at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and shielding effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements.

Construction Noise

Average noise levels from project-related construction activities are calculated by modeling the three loudest pieces of equipment per activity phase. Equipment site preparation and site preparation soil hauling is modeled at spatially averaged distances (i.e., from the acoustical center of the general construction site to the property line of the nearest receptors) because the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors for mobile equipment. Construction equipment for field lighting is modeled from where the proposed field lighting is to the nearest sensitive receptors.

The proposed project's expected construction equipment mix was categorized by construction activity using the FHWA Roadway Construction Noise Model (RCNM 2006). The associated, aggregate sound levels—grouped by construction activity—are summarized in Table 8, *Project-Related Construction Noise (dBA Leq)*. RCNM modeling input and output worksheets are included in Appendix C.

As shown in Table 8, on-site construction-related noise levels would not exceed the 80 dBA L_{eq} threshold at the nearest sensitive receptors that are 125 feet from the nearest proposed project light pole installation. In addition, the nearest sensitive receptors to the acoustical center of the tennis court construction activities are 365 feet to the north. However, as shown on Table 7, construction activity would exceed the 5 dB threshold increase for any activity that occurs for 15 minutes or more within any hour. Therefore, construction-equipment noise impacts would be considered potentially significant.

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Table 8 Project-Related Construction Noise, dBA Leq

Construction Activity Phase	RCNM Reference Noise Level	Residences to the North at 909 Rock Springs Road	Residences to the East at 305 Richland Road	Residences to the Southeast at Mission Park Condominiums	Mission Hills High School Buildings to the West
<i>Distance in feet</i>	50	365	235	325	175
Demolition	81	64	68	65	70
Site Prep	79	62	66	63	68
Grading	80	63	67	64	69
<i>Distance in feet</i>	50	450	125	200	400
Field Lighting Install	72	53	64	60	54
Maximum dBA L_{eq}		64	68	65	70
Exceed 80 L_{eq} dBA Threshold?		No	No	No	No
Measured Ambient		~48	~58	~72	NA
Exceed 5 dB Over Ambient?		Yes	Yes	No	

Notes: Calculations performed with the FHWA RCNM software are included in Appendix C.

However, implementing Mitigation Measure N-1 would reduce noise from construction activities at the impacted sensitive receptors along Richland Road and Rock Springs Road. Construction noise levels would be reduced by 6 dBA with the use of the best available noise control techniques, specifically the use of proper engine mufflers. A study prepared for the US Department of Transportation found that in cases where a particular piece of equipment either does not have or has a very poor muffler, the application of a good muffler will reduce the overall noise by 6 to 12 dBA (Toth 1979).

Mitigation Measures

N-1 The San Marcos Unified School District construction contract bid shall require the chosen construction contractor(s) to prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan shall be included as part of the permit application drawing set and as part of the construction drawing set. The Construction Noise Control Plan shall include, but not be limited to the following:

- At least 90 days prior to the start of construction activities, all off-site businesses and residents within 300 feet of the project site shall be notified of the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification shall include the telephone numbers of the San Marcos Unified School District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint.
- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the San Marcos School District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint,

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they shall investigate, take appropriate corrective action, and report the action to the San Marcos Unified School District.

- During the entire active construction period, equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds).
- Require the contractor to use impact tools (e.g., jack hammers and hoe rams) that are hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- During the entire active construction period, stationary noise sources shall be located as far from sensitive receptors as possible, and they shall be muffled and enclosed within temporary sheds, or insulation barriers or other measures.
- Select haul routes that avoid the greatest amount of sensitive use areas.
- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.
- During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.

Operational Noise

Mobile Noise

The proposed project would not result in an increase in the number of students nor staff at the campus. Additionally, there are no planned roadway upgrades associated with the proposed project. Furthermore, no bleachers or general seating is proposed for audience viewing. The proposed project would not result in a significant change in long-term traffic volumes. Therefore, traffic noise increases from the proposed project on nearby roadway segments would be less than significant.

Student Recreational Noise

The proposed project would include replacing the natural turf with synthetic turf and installing permanent non-directional lighting to replace the temporary lighting at the existing multi-purpose field. The proposed project would also include resurfacing the existing stadium and tennis courts, and removing two existing tennis courts and replacing them with three volleyball courts. The field lighting would consist of four, 70-foot galvanized steel light poles with pre-cast concrete bases. The intent of the field lighting is to extend the hours

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available for team practices at Mission Hills High School. The school currently uses temporary field lights; the multi-purpose field would be used for practice only. Mission Hills High School would be able to have practice onsite instead of using other locations, such as Palomar Community College, San Marcos Middle School, and Woodland Park Middle School.

Multi-Purpose Field and Tennis/Volleyball Courts

Noise levels for multi-purpose field activities measure approximately 60 dBA Leq at 15 feet. The nearest noise sensitive receptor to the nearest multi-purpose field goalie box is approximately 100 feet to the east across Richland Road. At that distance, noise levels would attenuate to 44 dBA dBA Leq.

Noise levels for tennis activities measure approximately 60 dBA at 20 feet. The nearest noise sensitive receptor to the nearest existing tennis court is approximately 270 feet to the north along Rock Springs Road. At that distance, noise levels would attenuate to 37 dBA Leq. The nearest proposed volleyball court would also be approximately 270 feet from the nearest noise sensitive receptor to the north along Rock Springs Road and would also attenuate to below 40 dBA Leq.

As a result, activities on the multi-purpose field, tennis, and volleyball courts would not exceed the City's daytime and nighttime exterior noise standards of 60 dBA and 50 dBA, respectively, at single and multi-family residences along Richland Road. Furthermore, activities on the field would result in a less than 1 dBA increase to existing ambient noise levels and would not represent a substantial increase. Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

Operational Vibration

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.

Construction Vibration

Vibration Annoyance

Groundborne vibration is rarely annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers. For annoyance, vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames. Since construction activities are typically distributed throughout the project site, vibration annoyance impacts are typically based on average vibration levels (levels that would be experienced by sensitive receptors most of the time). Therefore, to represent the worst-case scenario of vibration levels, distances to the nearest sensitive receptor buildings are measured from the closest distances the equipment below might occur to the sensitive receptor. As a result, the calculations were measured from the closest construction activity/light pole installation. For vibration annoyance, the FTA vibration level limit of 72 VdB will apply to the surrounding residential receptors and classroom buildings.

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Table 9, *Worst-Case Annoyance Vibration Levels from Construction Equipment*, shows the vibration levels from typical earthmoving construction equipment at the nearest receptors. Table 9 shows construction-generated vibration levels from a roller would not exceed 72 VdB at sensitive receptors to the east and north of the project site. The nearest Richland Road receptors to construction vibration activity would be 125 feet from the multi-purpose field, resulting in a vibration level of up to 66 VdB at that distance. The nearest Rock Springs Road receptors to construction vibration activity would be 260 feet from tennis courts/volleyball courts, resulting in a vibration level of up to 64 VdB at that distance. A roller would only be used at the tennis court/volleyball court area of the project site. In addition, Section 20.300.070(f) of the Municipal Code exempts vibration annoyance for temporary construction and demolition during daytime hours. Therefore, impacts related to construction vibration annoyance would be less than significant.

Table 9 Worst-Case Annoyance Vibration Levels from Construction Equipment

Equipment	Vibration Levels (VdB)				
	Reference Levels at 25 feet	Residences North of the Tennis/ Volleyball Court Improvements at 260 feet	Residences East of the Light Pole Installation at 125 feet	Residences South of the Light Pole Installation at 375 feet	Mission Hills High School Buildings to the West of the Tennis/ Volleyball Court Improvements at 145 feet
Vibratory Roller	94.0	63.5	73.0	58.7	71.1
Static Roller	82.0	51.5	61.0	46.7	59.1
Hoe Ram	87.0	56.5	66.0	51.7	64.1
Large Bulldozer	87.0	56.5	66.0	51.7	64.1
Caisson Drilling	87.0	56.5	66.0	51.7	64.1
Loaded Trucks	86.0	55.5	65.0	50.7	63.1
Jackhammer	79.0	48.5	58.0	43.7	56.1
Small Bulldozer	58.0	27.5	37.0	22.7	35.1
FTA Threshold	-	72	72	72	72
Exceeds Threshold?	-	No	No ¹	No	No

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

Bold numbers indicate values that exceed the FTA annoyance criteria.

NA= Not Applicable

Distances are from the nearest distance from where these equipment pieces may be used to the nearest receptor building within each land use type. See Appendix C

¹ Based on vibration levels due to a bulldozer, a vibratory would only be used at the tennis court area, more than 450 feet from sensitive receptors to the east.

Vibration Damage

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

For reference, a vibration level of 0.2 in/sec PPV is used as the limit for non-engineered timber and masonry buildings (which would apply to the surrounding residential structures) (FTA 2018). Vibration damage is

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measured from the edge of the project site to the nearest structure (home) façade because vibration damage, unlike human vibration perception or annoyance, is determined by measuring instantaneous peak particle velocity generated by equipment. Table 10, *Vibration Damage Levels for Typical Construction Equipment*, summarizes vibration levels for typical construction equipment at a reference distance of 25 feet and at the nearest sensitive receptors. The nearest structures to proposed construction activities are the residences approximately 125 feet to the east of the campus. If paving, demolition, grading, and earthwork equipment operating within approximately 25 feet or less of the residences, the 0.2 in/sec PPV threshold would be exceeded.

Table 10 Vibration Damage Levels for Typical Construction Equipment

Equipment	PPV (in/sec)				
	FTA Reference at 25 feet	Residences to the north of Tennis/ Volleyball Court Improvements at 260 feet	Residences to the east of the Light Pole Installation at 125 feet	Residences to the south of the Light Pole Installation at 375 feet	Mission Hills High School Buildings to the West of Tennis/ Volleyball Court Improvements at 145 feet
Vibratory Roller	0.21	0.006	0.019	0.004	0.015
Static Roller	0.05	0.001	0.004	0.001	0.014
Hoe Ram	0.089	0.003	0.008	0.002	0.004
Large Bulldozer	0.089	0.003	0.008	0.002	0.006
Caisson Drilling	0.089	0.003	0.008	0.002	0.006
Loaded Trucks	0.076	0.002	0.007	0.001	0.006
Jackhammer	0.035	0.001	0.003	0.001	0.005
Small Bulldozer	0.003	0.000	0.000	0.000	0.003

Sources: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

NA= Not Applicable

Bold = Threshold exceedance

See Appendix C

As shown in Table 10, the nearest vibration sensitive receptor would be exposed to project construction vibration levels of up to 0.019 in/sec PPV. As a result, project vibration levels would not exceed the 0.2 in/sec PPV threshold at nearby sensitive receptors. Therefore, impacts related to construction vibration damage would be less than significant.

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

No Impact. The proposed project is located approximately 7.1 miles southwest from the nearest airport which is the McClellan-Palomar Airport. The proposed project would not expose people working in the project area to excessive aircraft noise levels. Therefore, no impact would occur, and no mitigation measures are necessary.

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3.14 POPULATION AND HOUSING

Would the project:

XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

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

No Impact. The proposed project would be served by existing roads and other infrastructure. No new roads, expanded utility lines, or housing would be constructed or required as part of the proposed project. The proposed project would serve students already living in the area and would not change capacity. No impacts would occur.

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

No Impact. No housing exists on the high school campus. The proposed project would not require the relocation or construction of replacement housing, nor would the proposed project displace people. Therefore, 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:

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. 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:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?				X
d) Parks?				X
e) Other public facilities?				X

a) Fire protection?

Less Than Significant Impact. The San Marcos Fire Department (SMFD) provides fire and emergency medical services to the City of San Marcos, including Mission Hills High School. The nearest SMFD station to the campus is SMFD Fire Station 3 at 404 Woodland Parkway, approximately 0.14 mile east of the campus. The proposed project would make improvements to the District's sports facilities and would not increase enrollment or capacity at the school. Additionally, the proposed project would not modify any existing fire lanes at the school. The project site is already served by SMFD, and the proposed project would accommodate the existing school program and students. Therefore, impacts would be less than significant.

b) Police protection?

Less Than Significant Impact. The Mission Hills High School campus and the surrounding areas are already served by the existing San Diego County Sheriff Department's San Marcos Station at 182 Santar Place, approximately 0.15 mile southwest of the campus. The proposed project would not substantially increase the need for police protection service because the student enrollment and capacity would not increase. The proposed project would not require the San Diego County Sheriff Department to expand or build new facilities, and impacts would be less than significant.

c) Schools?

No Impact. The proposed project would not increase demand for new or expanded public schools. No impact would occur.

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d) Parks?

No Impact. Impacts to public parks are generally caused by population or employment growth. The proposed project would improve the sports facilities onsite and would not induce growth or influence housing in the area to create additional demands for parks. Therefore, no physical impacts to parks and recreation would occur.

e) Other public facilities?

No Impact. Physical impacts to public services are usually associated with population in-migration and growth, which increase the demand for public services and facilities. The proposed project would not result in impacts associated with the provision of other new or physically altered public facilities (e.g., libraries, hospitals, childcare, teen or senior centers). The proposed project would not induce population growth, and no impacts would occur.

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. Implementation of the proposed project make improvements to the existing sports facilities at the campus. The proposed project would accommodate the existing school programs and students already served by the District. The proposed project would not increase capacity or the number of people using existing parks and recreation facilities. No impact 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. Physical effects of the sports facilities improvements are addressed throughout this Initial Study. The proposed project would not construct or expand recreational facilities other than what is being proposed as part of this project. As discussed in various sections of the Initial Study, the

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proposed project would not result in adverse physical effects on the environment with the implementation of mitigation measures. No other mitigation measures are required.

3.17 TRANSPORTATION

This section summarizes the results of a traffic/transportation analysis that was conducted for the proposed field lighting project at Mission Hills High School in the City of San Marcos, San Diego County. The high school campus is bounded by Richland Road to the east, Mission Road to the south, Mission Hills Court to the west, and Hollandia Park and single-family residences to the north. The following paragraphs provide a brief description of the streets that provide access to the high school campus, the existing bicycle and pedestrian facilities, and the existing transit service in the area.

Street Network, Sidewalks, Crosswalks, and Bike Lanes

Richland Road

Richland Road is a two lane north-south street that abuts the east side of the school campus and is adjacent to the athletics/multi-purpose field that is proposed to be lit with permanent lighting poles. It has a sidewalk and parking on the east side of the street and no sidewalk or parking on the west side of the street adjacent to the school campus. North of the campus, Richland Road has a sidewalk and parking on the west side of the street, no sidewalk on the east side of the street, and parking along a shoulder. There is one school access driveway on the west side of Richland Road that provides access to a school parking lot and bus loading area on the north end of the campus. The speed limit on Richland Road is 25 miles per hour (mph).

Mission Road

Mission Road is a six lane east-west street that abuts the south side of the school campus. It has sidewalks and bike lanes on both sides of the street and parking is prohibited. There is a raised median with a fence in the center of the street to prevent midblock pedestrian crossings. There are two school access driveways on the north side of Mission Road that provide access to a school parking lot and student drop-off/pick-up area. The speed limit on Mission Road is 45 mph and there are signs that say “School – Speed Limit 25 When Children Are Present.”

Mission Hills Court

Mission Hills Court is a two to five lane north-south street that abuts the west side of the school campus. It has five lanes adjacent to the school campus (two northbound and three southbound lanes) and two lanes north of the school campus. There are sidewalks and/or walking paths on both sides of the street and parking is prohibited along the school frontage. There is intermittent parking on the segment of Mission Hills Court north of the school campus. The speed limit on Mission Hills Court is 25 mph.

Intersections Adjacent to the School Campus

The intersections that are adjacent to the school campus and the types of traffic control at each intersection are shown in Table 11, *Intersections Adjacent to the Mission Hills High School*. The locations of the existing yellow school crosswalks are also shown in Table 11.

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Table 11 Intersections Adjacent to Mission Hills High School

Intersection	Traffic Control	School Crosswalks (Yellow)
Mission Road at Mission Hills Court	Traffic Signal	On East, West, & North Sides
Mission Road at Liberty RV & Boat Depot Driveway	Traffic Signal	On East & West Sides across Mission Road
Mission Road at School Driveway	Traffic Signal	On West & North Sides
Mission Road at Richland Road	Stop Sign on Richland Road	None
Mission Hills Court at School Driveway	All-Way Stop Signs	On South & East Sides

Bike Lanes

Marked bike lanes are in place on both sides of Mission Road, which runs along the south side of the school campus. Bike lanes are also in place on Rock Springs Road, which is located approximately 600 feet north of the school campus, and on Mulberry Drive, which is located approximately one-quarter mile west of the school campus.

Public Transportation

North County Transit District (NCTD) operates one bus line in the vicinity of Mission Hills High School. Route 305 runs along Mission Road adjacent to the school site and has eastbound and westbound bus stops adjacent to the school campus. This bus route offers a convenient public transportation option for patrons of the athletics/multi-purpose field.

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION. Would the project:				
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. The proposed project would not increase the number of games/activities at the multi-purpose field. Currently, the existing 20 tennis matches generate approximately 20 spectators; however, with the reduction in tennis courts, the number of spectators is estimated to be 14-16. The proposed

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volleyball courts would result in 20 games per year, which are expected to have between 2 to 8 spectators per game. On a worst-case day basis, volleyball games would not generate more vehicle trips than what is currently generated by the existing sporting events and activities in the project area. Therefore, on an annual basis, the proposed project, when accounting for the anticipated decrease in tennis attendance, could result in a net change in sporting events attendance at the project site ranging from a decrease of 80 spectators per year to an increase of 80 spectators per year. However, the potential increase in the number of spectators and new vehicle trips per year would be considered negligible because most of these spectators would likely be students, families, and community members who already live in the area and contribute to the existing traffic.

The proposed project could generate a demand for non-motorized travel as some students/participants would travel to and from the campus as pedestrians or on bicycles. The streets adjacent to and near the school have sidewalks along one or both sides of the street, and the signalized and all-way stop intersections listed in Table 11 are equipped with painted crosswalks. The signalized intersections have pedestrian walk signals with pedestrian push buttons, and bike lanes are provided on Mission Road, Rock Springs Road, and Mulberry Drive. In addition, bike racks are available at the school. As such, there are multiple features at and near the project site that can accommodate bicycle and pedestrian travel.

Some students and/or coaches could potentially use public transit, provided by NCTD, to travel to and/or from the school site. NCTD operates one bus line in the vicinity of Mission Hills High School—Route 305 that runs along Mission Road adjacent to the school site. The proposed project's impact on this bus route would be negligible.

In summary, the proposed project would not adversely affect traffic conditions on the study area street network or the performance of any transit or non-motorized transportation facilities. The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The proposed project would not create new trips, but rather redirect trips to the project site as opposed to other locations within the project area. Therefore, impacts would be less than significant.

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

No Impact. Vehicle delays and levels of service (LOS) have historically been used as the basis for determining the significance of traffic impacts as standard practice in CEQA documents. On September 27, 2013, SB 743 was signed into law, starting a process that fundamentally changed transportation impact analyses as part of CEQA compliance. SB 743 eliminates auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as the sole basis for determining significant impacts under CEQA. As part of the new CEQA Guidelines, the new criteria “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (Public Resources Code Section 21099(b)(1)). Pursuant to SB 743, the California Natural Resources Agency adopted revisions to the CEQA Guidelines on December 28, 2018, to implement SB 743. CEQA Guidelines Section 15064.3 describes how transportation impacts are to be analyzed after SB 743. Under the new Guidelines, metrics related to “vehicle miles traveled” (VMT) are required beginning July 1, 2020, to evaluate the significance of transportation impacts under CEQA for development projects, land use plans, and transportation infrastructure projects. The State provided an

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“opt-in period” and did not require lead agencies to apply a VMT metric until July 1, 2020. However, in January 2020, State courts stated that under the Public Resources Code Section 21099, subdivision (b)(2), “automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment” under CEQA, except for roadway capacity projects.

As stated in the “Technical Advisory on Evaluating Transportation Impacts in CEQA” (California Office of Planning and Research, December 2018) and the “Vehicle Miles Traveled – Focused Transportation Impact Study Guide” (Caltrans, May 20, 2020), projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact and can be screened from a CEQA VMT analysis because they fall into the small project category.

While the proposed project could result in an increase in 80 spectators per year, this would be less than 110 trips per day, and therefore, it is assumed that the proposed project can be screened from a CEQA VMT analysis.

In addition to the State of California screening methodology outlined above, the “Transportation Impact Analysis Guidelines” prepared by the City of San Marcos (November 16, 2020) state that uses that are local-serving public facilities can be presumed to have a less-than-significant transportation impact and would not require a detailed VMT analysis, absent substantial evidence that they will generate significant VMT. The proposed project is included in the local-serving public facilities category. Therefore, the proposed project can be screened from any further VMT analysis in accordance with the City of San Marcos criteria.

It is concluded, based on the State of California CEQA VMT guidelines and the City of San Marcos VMT guidelines, that the project would have no VMT impacts. The proposed project would not create a substantial increase in new trips and is a local-serving public facility. 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)?

No Impact. The proposed project would not modify the on- or off-site access or circulation system. Access to the school for vehicles, bicyclists, and pedestrians would continue to occur via the existing driveways, sidewalks, and on-site pedestrian pathways. The school’s parking lots would continue to be accessed via the existing driveways on Richland Road and Mission Hills Court. The streets, intersections, driveways, and on-site circulation system are designed to accommodate the anticipated levels of vehicular and pedestrian activity and have historically been accommodating school and sports-related traffic on a daily basis. As the proposed project would not result in any modifications to the existing access or circulation features at the school or on the surrounding streets, there would be no impacts involving increased hazards due to a geometric design feature or incompatible uses.

d) Result in inadequate emergency access?

No Impact. The existing access and circulation features at the school, including the driveways, on-site circulation roads, parking lots, and fire lanes, would continue to accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. The proposed project would not alter any

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emergency access features at the school. Emergency vehicles could easily access the school via on-site travel corridors. The proposed project would not, therefore, result in inadequate emergency access. 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 campus is not listed as a historical resource in the National Register of Historic Places or California Historical Resources (NPS 2020; OHP 2023). Therefore, implementation of the proposed project would not impact tribal cultural resources pursuant to Public Resources Code Section 21074(a)(1). No impact to historical resources 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**

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Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact With Mitigation Incorporated. As part of the AB 52 process, Native American tribes must submit a written request to the District to be notified of projects within their traditionally and culturally affiliated areas. The District must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to the District within 30 days of receiving this notification if they want to engage in consultation on the project, and the District must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes under these circumstances: 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource; 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached; or 3) a tribe does not engage in the consultation process or provides comments.

The District notified the Rincon Band of Luiseno Indians on June 2, 2023. The Tribe responded asking for additional information in order to determine if AB 52 consultation would be needed. The District put the project on hold from January 2024 through September 2024. The District re-engaged correspondence with the Tribe on January 31, 2025. The Tribe responded on March 10, 2025, requesting consultation. The District and the Tribe consulted on March 25, 2025. On March 28, 2025, the Tribe sent edits to the cultural and tribal cultural resources mitigation measures, and requested that the revisions be included in the IS/MND; the mitigation measures in this IS/MND incorporated the Tribe's revisions.

The high school is not identified as historically significant in the California Register of Historic Resources or meets any of the criteria for listing in the National Register of Historic Places. The proposed project would require minimal ground-disturbing activities to install the lights and replace the flooring of the sports facilities. Because the campus has already been developed, ground-disturbing activities would occur within the artificial fill layer of the soil and would not disturb native soils that may contain tribal cultural resources. Although the likelihood of discovering tribal cultural resources is unlikely, the potential for discovering previously unidentified subsurface tribal cultural resources exists. Therefore, Mitigation Measure TCR-1 has been incorporated to reduce impacts to a less than significant level.

Mitigation Measures

TCR-1 If cultural resources are encountered during ground-disturbing activities, the District shall enter into a pre-excavation and monitoring agreement with the Rincon Band of Luiseno Indians. The tribal monitor shall only be present on-site during the construction phases that involve ground-disturbing activities. If cultural resources are encountered during ground-disturbing activities, ground-disturbing activities are defined as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the project area. The tribal monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soils, and any cultural materials identified. The on-site monitoring shall end when the grading and excavation activities are completed or when the

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tribal representatives and monitor have indicated that the project site has a low potential for affecting tribal cultural resources.

Upon discovery of any tribal cultural resources, construction activities shall cease in the immediate vicinity of the find until the Rincon Native American monitor can assess the find. The evaluation of all tribal cultural resources unearthed by project construction activities shall be evaluated by a qualified archaeologist, Rincon Native American monitor, and Rincon Representative. If resources are Native American in origin, the District is to coordinate the temporary storage of the materials. All cultural materials are to be repatriated to the Rincon Band of Luiseno Indians and reburied on project site at a designated location. The District may continue work on other parts of the project site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]).

If the tribal monitor determines a resource to constitute a “historical resource” or “unique archaeological resource,” time and funding sufficient to allow for implementation of avoidance measures or appropriate mitigation must be available. The treatment plan established in consultation with the Rincon Band of Luiseno Indians for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Section 21083.2(b) for unique archaeological resources. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource. All materials of Native American origin are to be repatriated to the Rincon Band of Luiseno Indians for reburial on project site at a location agreed upon in consultation between the Rincon Band of Luiseno Indians. The District shall be responsible for ensuring that a public, nonprofit institution with a research interest in the materials, such as the San Diego Natural History Museum, curate any historic archaeological material that is not Native American in origin if such an institution agrees to accept the material.

If no institution accepts the archaeological material, the District shall offer it to a local historical society for educational purposes or retain the material and use it for educational purposes.

TCR-2 Installation of an interpretive sign to highlight the rich history and culture of the Luiseno people. Given the Rincon Band of Luiseno Indians’ deep-rooted connection to this land, it is vital to educate the public about their traditions, language, and historical presence in the region. The sign shall be placed at a prominent location near the previously recorded archaeological site, an area of cultural significance, ensuring that visitors gain a meaningful understanding of the Luiseno heritage. Content for the sign shall be developed in consultation with the Rincon Band of Luiseno Indians and could include information on the Rincon Band of Luiseno Indians’ ancestral lands, traditional practices, and ongoing efforts to preserve and revitalize the Rincon Band of Luiseno Indians’ culture.

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3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

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

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

Less Than Significant Impact.

Water and Wastewater Treatment

The Vallecitos Water District provides water and wastewater services to the campus. The proposed project would make improvements to the sports facilities onsite. The proposed project would not increase the existing student capacity and would not generate additional water demand or wastewater. Therefore, the overall demand for the treatment of water and wastewater would not increase. The proposed project would not require the relocation or construction of new or expanded water and wastewater treatment facilities; impacts would be less than significant.

Stormwater Drainage

The proposed project would result in a minor increase in impervious surfaces on the project site, and the majority of the project site would remain in its current state. Therefore, the amount of stormwater runoff would be similar to existing conditions. The proposed project would not substantially increase the rate or

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amount of stormwater runoff. The proposed project would not result in the relocation or construction of stormwater drainage. Impacts would be less than significant.

Electric Power

Electricity is provided by San Diego Gas and Electric (SDGE). The proposed project would require connecting to existing and new electric power infrastructure for operation. Trenching for electrical lines would be necessary to connect to existing electrical facilities within the campus. The school currently uses temporary lights to light the multi-purpose field. The proposed project would install permanent lights. As such, the proposed project's electricity demand would be similar to existing conditions. Implementation of the proposed project would not result in major construction related to electrical power facilities that could cause significant environmental impacts. Impacts would be less than significant.

Natural Gas

Natural gas service is provided by the SDGE. The proposed project would not require use of natural gas during operation. However, if necessary, there are SDGE lines to connect to because the site is already developed and operating as a high school. The proposed project would not require the construction of new or expanded facilities. No impact would occur.

Telecommunications

There are existing telecommunications facilities and services in the immediate area for the proposed project to connect to, if necessary. However, the proposed project would not require additional telecommunications demand. The proposed project would not require off-site construction or relocation of utilities, and therefore, would not cause significant environmental effects from such action. Impacts would be less than significant.

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

No Impact. The proposed project would make improvements to the sports facilities on campus. The proposed project would not increase the existing student capacity, and therefore, would not generate additional water demand. No impact to existing water supplies would occur.

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?

No Impact. The proposed project would make improvements to the sports facilities on campus. The proposed project would not increase the existing student capacity, and therefore, would not generate additional wastewater. No impact would occur.

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- 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. The proposed project would make improvements to the sports facilities on campus. During construction, the proposed project would generate some demolition debris from clearance and waste, and debris from construction. CALGreen Section 5.408.1.1 requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction activities be recycled and/or salvaged for reuse. The proposed project would comply with the required regulation pertaining to construction and demolition waste and would not exceed the capacity of regional landfills or impair the attainment of solid waste reduction goals in the City of San Marcos. The proposed project would not increase the existing student capacity and therefore, any increases in solid waste during operational activities would be negligible. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The proposed project is required to comply with federal, state, and local statutes and regulations related to solid waste and would continue this practice. CALGreen Section 5.408 requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction be recycled and/or salvaged for reuse. Solid waste demand from the proposed project would not impact the City's ability to comply with AB 939 and the solid waste landfill capacity. Project development would not conflict with laws governing solid waste disposal, and 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	

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 campus is not within a VHFHSZ (CAL FIRE 2025). However, the campus is approximately 0.5 mile north of a 2007-2011 recommended area designated VHFHSZ in a Local Responsibility Area. The proposed project would not increase student capacity or other school programs that would affect the existing emergency response plan or emergency evacuation plan. Impacts would be less than significant.

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

Less Than Significant Impact. The campus is not within a VHFHSZ (CAL FIRE 2025). The proposed project, which is flat, would not exacerbate wildfire risks. The proposed project would not result in increased exposure to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. 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 campus is not within a VHFHSZ (CAL FIRE 2025). Additionally, the campus is served by existing infrastructure. Installation of sports lighting and necessary utility lines would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. 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 campus is not within a VHFHSZ or flood zone. The proposed project would have minimal impact on the existing drainage and runoff. The project site is flat, and no slope instability would occur. Implementation of the proposed project would not expose people or structures to significant downslope or downstream flooding or landslides. Impacts would be less than significant.

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3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Less Than Significant Impact With Mitigation Incorporated. As discussed in Section 3.4, *Biological Resources*, the proposed project would not have a significant impact on biological resources, including plant, fish, and wildlife species. As discussed in Section 3.5, *Cultural Resources*, Section 3.7, *Geology and Soils*, and Section 3.18, *Tribal Cultural Resources*, implementation of Mitigation Measure CUL-1, Mitigation Measure GEO-1, and Mitigations TCR-1 and TCR-2, would reduce impacts to cultural, paleontological, and tribal cultural resources, respectively, to less than significant. Therefore, impacts to wildlife species and California history or prehistory would be less than significant upon implementation of mitigation measures.

- 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. A cumulative impact could occur if the proposed project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. Because the proposed project would

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accommodate sports programs and events within the District's boundaries, construction would be short-term, and the proposed project would not increase capacity, impacts would not be cumulatively considerable. Therefore, 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 With Mitigation Incorporated. The proposed project would comply with applicable local, state, and federal laws governing general welfare and environmental protection. Implementation of Mitigation Measure N-1 would reduce construction-related noise on sensitive receptors to less than significant. Therefore, impacts of the proposed project on human beings, directly or indirectly, would be less than significant with mitigation incorporated.

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