April 2025 | Initial Study

COMMUNITY EDUCATION AND RESOURCE CENTER

San Ysidro School District

Prepared for:

San Ysidro School District
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PLACEWORKS

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Abbreviations and Acronyms

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

Abbreviations and Acronyms

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

Abbreviations and Acronyms

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

Abbreviations and Acronyms

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 Ysidro School District (District) proposes to construct a Community Education and Resource Center (CERC) on the former Beyer Elementary School site. The former school has been demolished and the project site is currently vacant and undeveloped, with the exception of a parking lot on the western portion of the site. The 9.9-acre site is at 2300 East Beyer Boulevard in the San Ysidro community in the City of San Diego. The proposed project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA).

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

1.1 PROJECT LOCATION

The project site is at 2300 East Beyer Boulevard in the San Ysidro community in the City of San Diego, California (Assessor's Parcel Number 638-170-1400). The project site is surrounded by residential uses to the north and west, the future Beyer Park to the east, and vacant land to the south.

The southern portion of the City of San Diego, which includes the San Ysidro community, is bounded by the US-Mexico border to the south, the cities of Imperial Beach and Chula Vista to the north, unincorporated San Diego County to the north and east, and the Pacific Ocean to the west. Regional access to the San Ysidro community is by Interstate 805 (I-805) approximately 390 feet to the west, I-5 approximately 0.32-mile to the south, and State Route 905 (SR-905) approximately 0.81-mile to the north of the project site. Figure 1, *Regional Location;* Figure 2, *Local Vicinity;* and Figure 3, *Aerial Photograph,* show the project site in its regional and local contexts.

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing and Surrounding Land Uses

The project site is the former Beyer Elementary School site; the former school has been demolished and the project site is currently vacant and undeveloped, with the exception of a parking lot at the western portion of the site, as shown in Figure 3.

The project site is in a residential community and is surrounded by the following land uses:

- **North:** Filoi Avenue and single-family residences
- **East:** Future Beyer Park

- **South:** Vacant land
- **West:** East Beyer Boulevard and multi-family residences

1.3 PROJECT DESCRIPTION

The District plans to build a CERC at the vacant project site. The District is seeking state funding and anticipates submitting plans to the California Division of the State Architect (DSA) in Summer 2025. Construction would be completed in one phase and is estimated to start in October 2025 and end by December 2026. The CERC is anticipated to be operational starting January 2027. Figure 4, *Conceptual Site Plan,* shows the proposed improvements and the location of the new facilities on the project site.

Building

The proposed project would include a 17,100-square-foot building with a 1,295-square-foot outdoor patio in the northern portion of the project site. The building would include educational and executive services in the western portion, and consist of office spaces, conference rooms, a breakroom, restrooms, and reception. The central portion of the building would include family resource services and the main lobby, and consist of a laundry room, donation room, food storage, health offices, and restrooms. Additionally, the eastern portion of the building would include the multipurpose room and outdoor event space, with storage and a staging kitchen.

The capacity for the outdoor event space would be 200 people, and the types of events anticipated include community gatherings, rallies, and similar large-scale assemblies. There would be approximately 25 to 35 employees and 5 to 15 patrons at the CERC on the site per day, and all uses on-site would be open to the public for daily use between 7:00 a.m. to 5:00 p.m. At its highest point, the CERC would be approximately 33 feet and 8 inches tall. The building would consist of white stucco, blue accent tiles, and terracotta tile roofing, as shown on Figure 5a and Figure 5b, *Conceptual Building Elevations*. The site would include walkway and security lighting. The proposed project would also include outlets for electric bicycle charging.

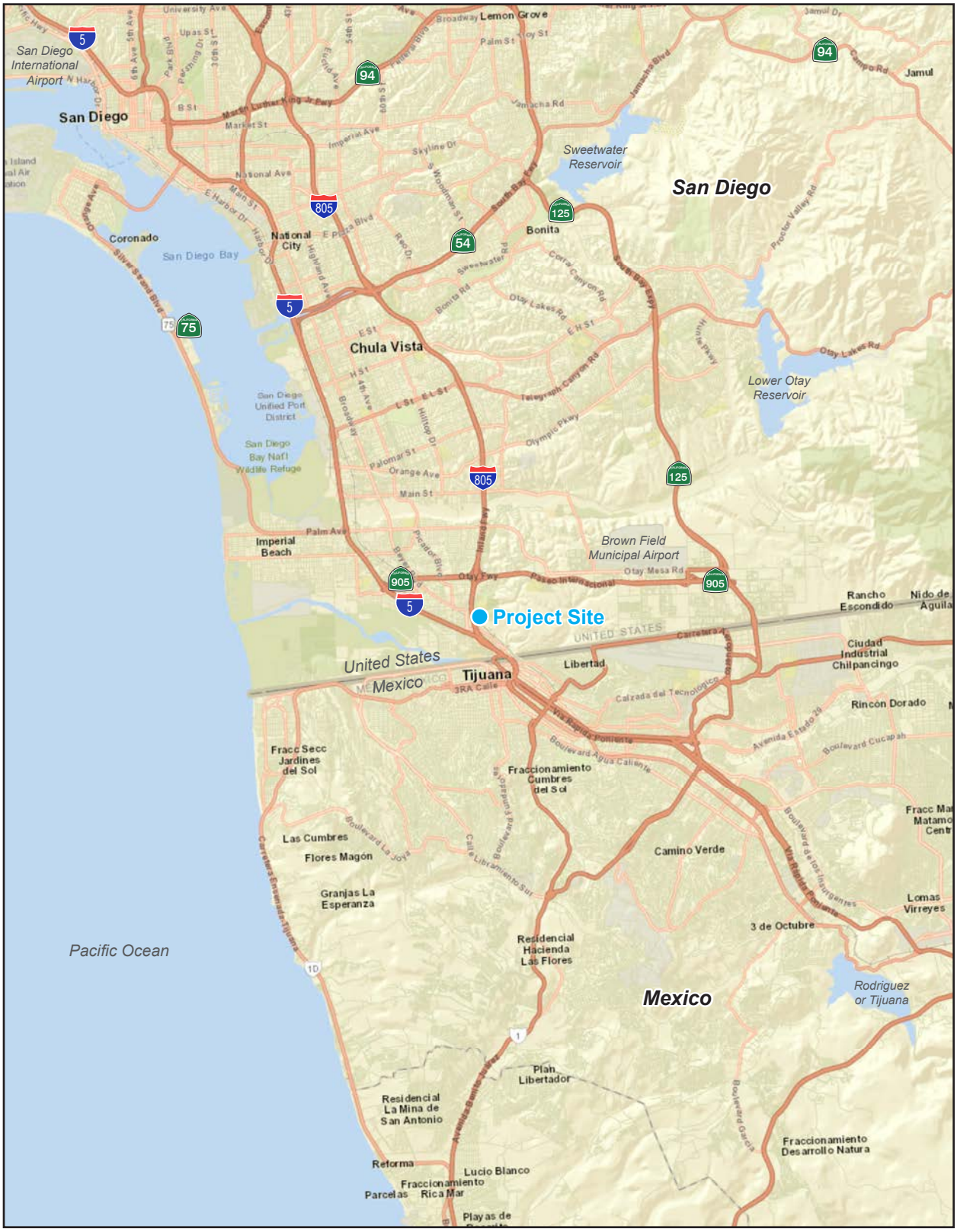
Recreational Facilities

To the southeast of the proposed CERC building would be two basketball courts (9,495 square feet), four pickleball courts (combined with a tennis court) (7,194 square feet), and a soccer field (69,500 square feet) to the south of these courts. These facilities would be open to the public for use during the weekdays, and may be open for use during the weekends or evenings. These recreational facilities may also be used for special events with prior approval from the District. There would be no sport lighting, scoreboards, public address (PA) systems, bleachers, amplified music, or exterior mechanical equipment.

Landscaping

The proposed project would include approximately 64,055 square feet of ornamental landscaping around the building and in the parking lot, 5,481 square feet of landscaping along the western boundary of the site, and 69,500 square feet of grass or turf for the proposed soccer field.

Figure 1 - Regional Location



Source: Generated using ArcMap 2025.

1. Introduction

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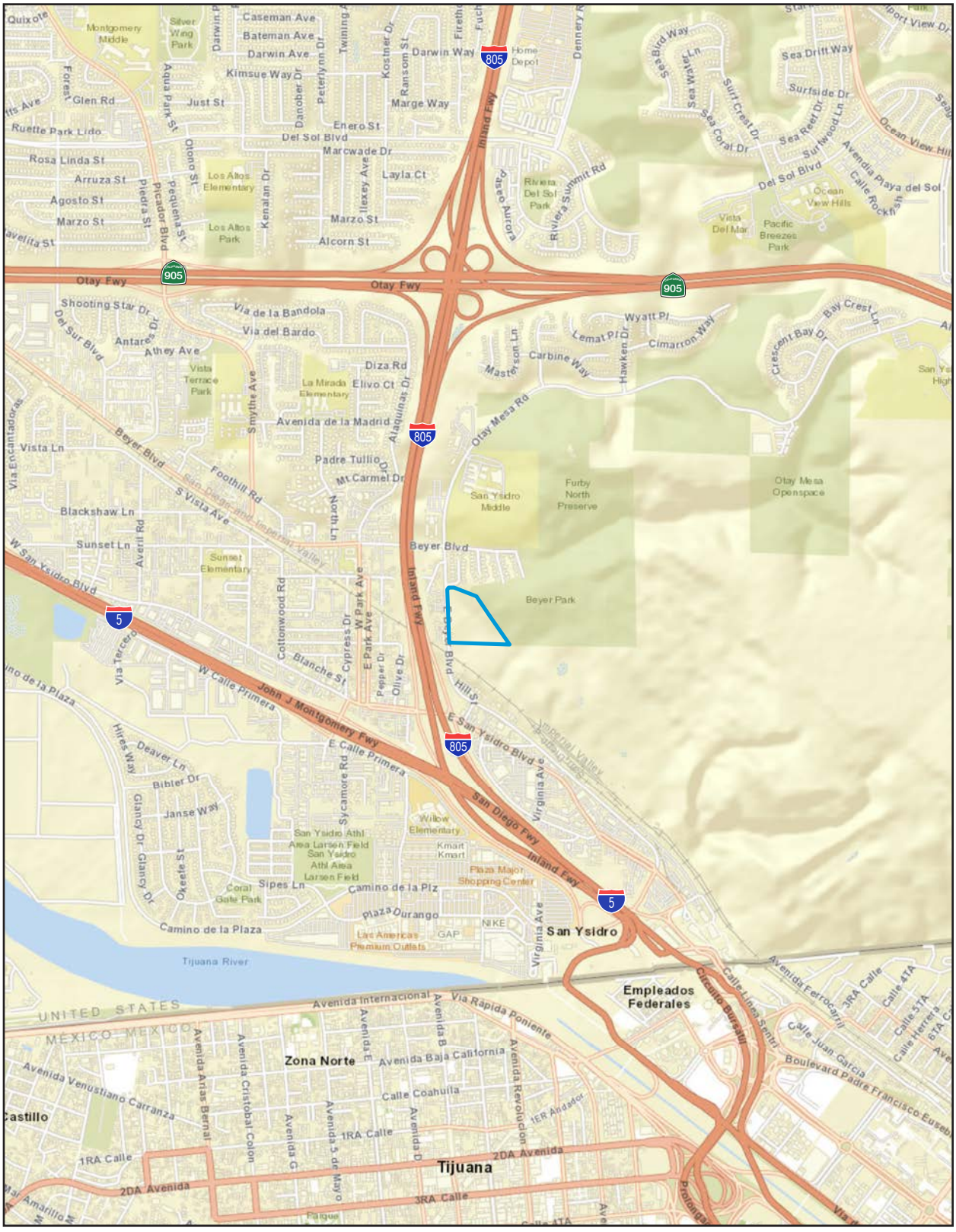
Figure 2 - Local Vicinity



Source: Generated using ArcMap 2025.

1. Introduction

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Figure 3 - Aerial Photograph

Project Location

0 650
Scale (Feet)

Source: Nearmap 2024.

1. Introduction

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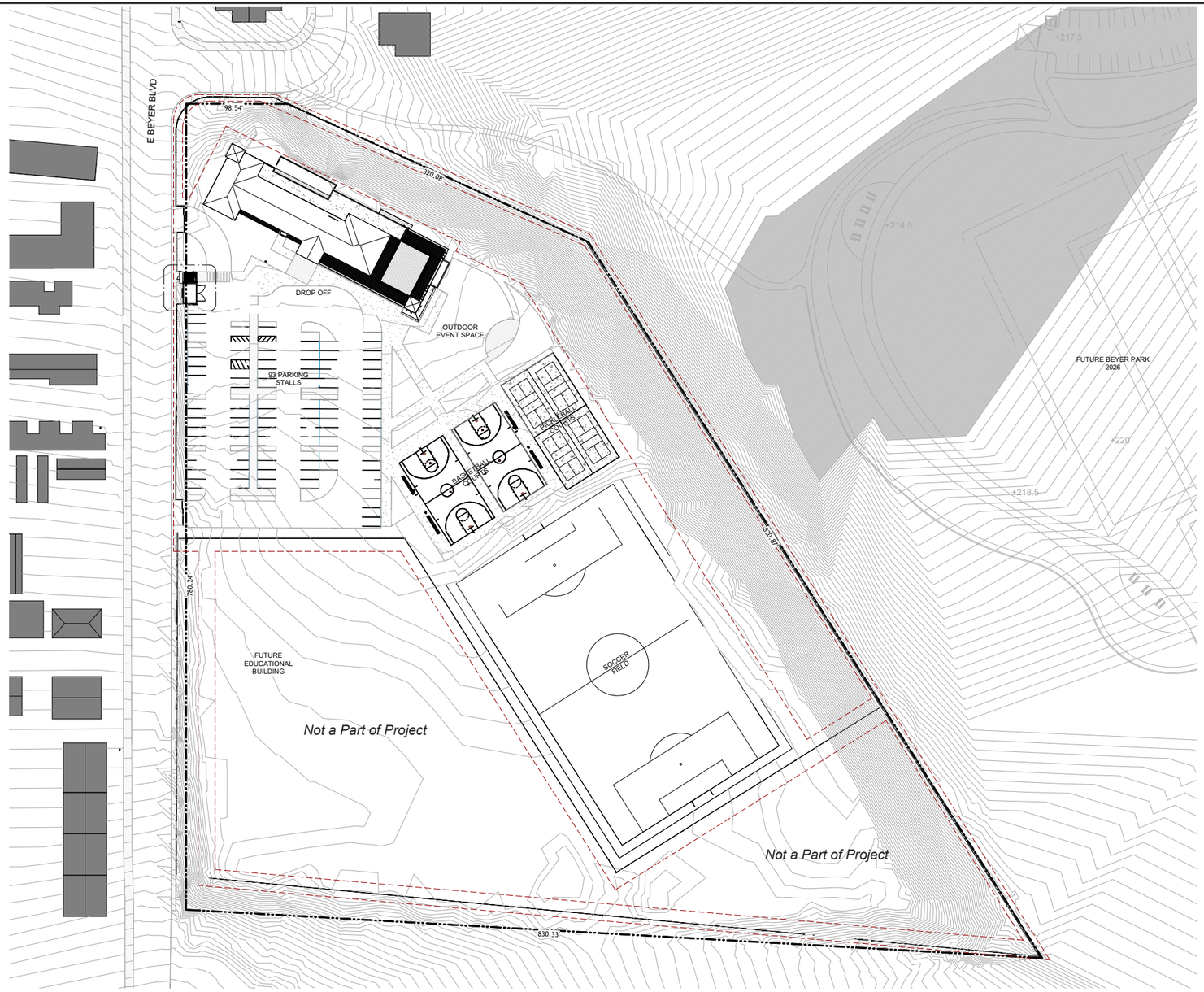
Figure 4 - Conceptual Site Plan



SITE PLAN GENERAL NOTES

1. EXISTING FIRE HYDRANTS SHOWN ON SITE PLAN ARE LOCATED WITHIN 600FT OF PROPOSED BUILDING

Property Line

Limit of Work

Existing Building Outside of Scope

0 120
Scale (Feet)

Source: RNT Architects 2024.

1. Introduction

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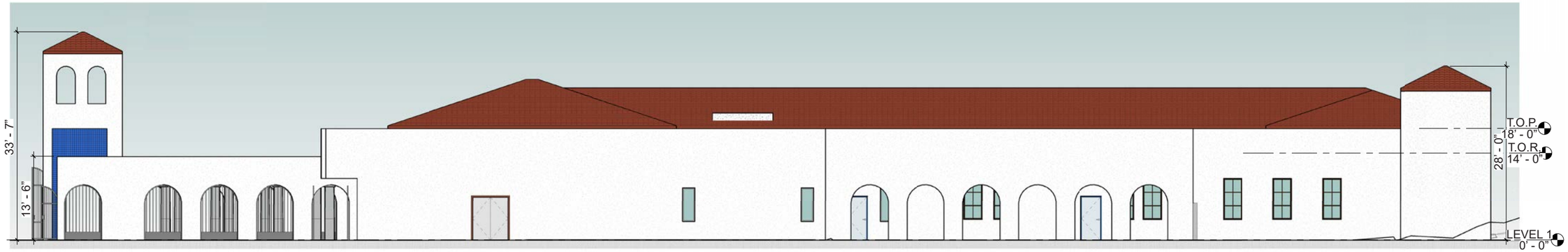
Figure 5a - Conceptual Building Elevations



NORTH BUILDING ELEVATION

WEST BUILDING ELEVATION

0 16
Scale (Feet)

Source: RNT Architects 2024.

1. Introduction

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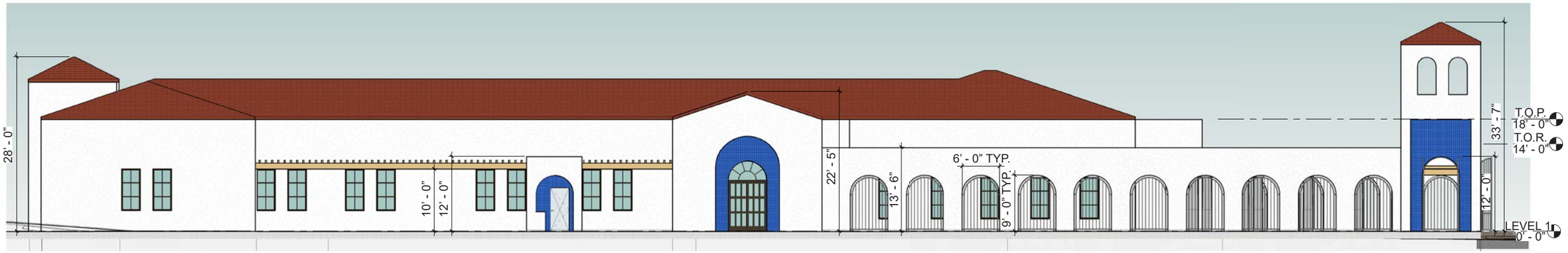
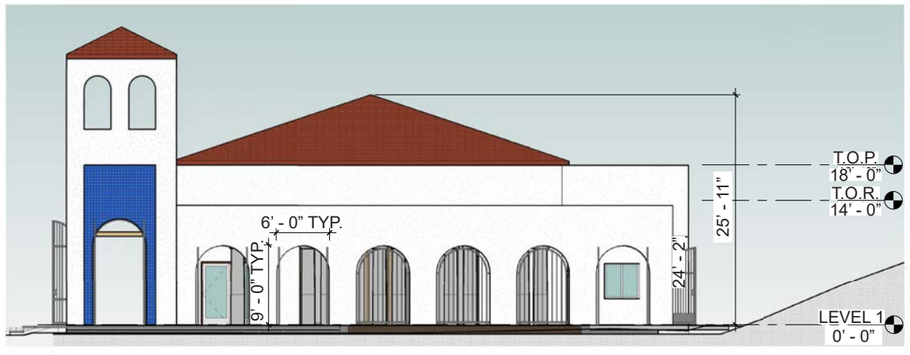
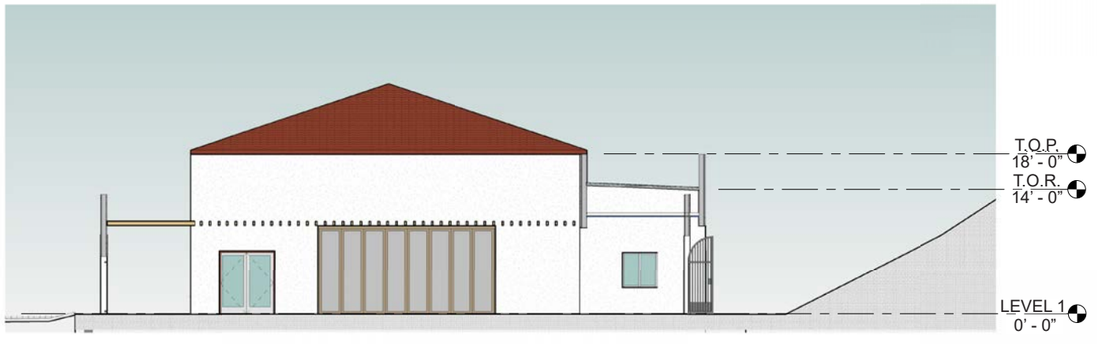
Figure 5b - Conceptual Building Elevations



SOUTH BUILDING ELEVATION



EAST BUILDING ELEVATION - COURTYARD



EAST BUILDING ELEVATION - MPR

0 17
Scale (Feet)

Source: RNT Architects 2024.

1. Introduction

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Access and Circulation

The site would be accessed via two driveways along Beyer Boulevard. The proposed parking lot would be south of the CERC building and consist of 93 parking spaces. A drop-off zone would be proposed at the northern portion of the parking lot, adjacent to the CERC building.

Fencing

The project site perimeter would be fenced to provide controlled access by the District. A large amount of the southwestern portion of the site will not be developed but saved for a future educational facility. This area would be fenced off from the rest of the proposed uses onsite. The District would prepare the appropriate environmental documentation and analyses at the time a project is proposed for this portion of the site. The site would include an 8-foot chain-link fence and 8-foot ornamental fence, and the pickleball courts would consist of 4-foot chain-link fencing, as shown in Figure 6, *Conceptual Fencing Plan*.

1. Introduction

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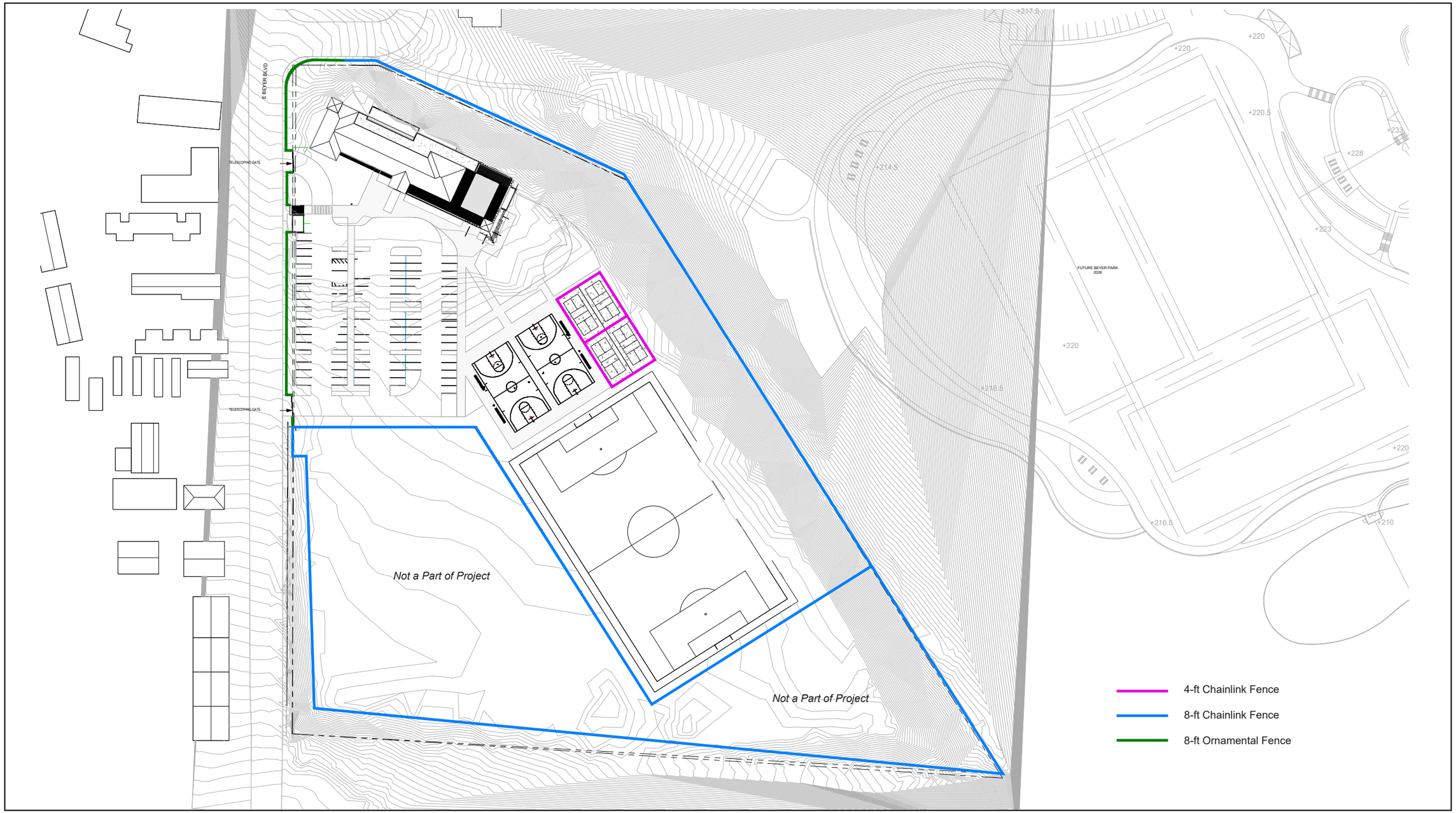
Figure 6 - Conceptual Fencing Plan



Source: RNT Architects 2024.

1. Introduction

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2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** Community Education and Resource Center Project

2. **Lead Agency Name and Address:**
   San Ysidro School District
   4350 Otay Mesa Road
   San Diego, CA 92154

3. **Contact Person and Phone Number:**
   Jose F. Iniguez, Ed.D., Assistant Superintendent – Admin. Leadership, School Support and Safety
   619.428.4476

4. **Project Location:**
   2300 East Beyer Boulevard,
   San Diego, CA 92173

5. **Project Sponsor's Name and Address:**
   San Ysidro School District
   4350 Otay Mesa Road
   San Diego, CA 92154

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

7. **Zoning:** RS-1-7 (Residential – Single Unit, requires minimum 5,000-square-foot lots)

8. **Description of Project:**
   The District plans to build a Community Education and Resource Center (CERC) at the vacant project site at 2300 East Beyer Boulevard in the City of San Diego, which would include the construction of the 17,100-square-foot CERC building. The building would include educational and executive services, family resource services, and a multipurpose room as well as an outdoor event space. The proposed project would include basketball courts, pickleball courts combined with a tennis court, and a soccer field.

9. **Surrounding Land Uses and Setting:**
   The project site is surrounded by residential uses to the north and west, the future Beyer Park to the east, and vacant land to the south.

2. Environmental Checklist

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

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

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

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

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

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

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

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

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

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

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

J.F. Iniguez J.F. Iniguez — *Signature*

4/10/25 — *Date*

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 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) I**mpacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

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

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

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

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

9. The explanation of each issue should identify:

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

2.5 MITIGATION MEASURE SUMMARY

As indicated in Section 3, *Environmental Analysis,* several topical areas will require mitigation measures to reduce potential impacts to a level of less than significant. The topical areas and mitigation measures identified for the proposed project are as follows:

Biological Resources

BIO-1 Permanent impacts to Diegan Coastal Sage Scrub – Disturbed habitat shall be offset through mitigation of habitat of equal or higher biological value at a one-to-one ratio. Prior to ground-disturbing activities, the District shall ensure that mitigation occurs by implementing one or a combination of the following: off-site or on-site preservation, enhancement, restoration, and/or creation of habitat; purchase of habitat mitigation credits from an approved mitigation area or bank, or other location deemed acceptable by the applicable regulatory agencies. If on-site preservation, enhancement, restoration, and/or creation of habitat is chosen, a restoration plan shall be prepared by qualified personnel with experience in Southern California ecosystems and native plant restoration techniques. At a minimum, the restoration plan shall include the following information: (a) the location of the mitigation site(s); (b) a schematic depicting the mitigation areas; (c) the plant species to be used, container sizes, and seeding rates; (d) a planting schedule; (e) a description of installation requirements, irrigation sources and methodology, erosion control, maintenance and monitoring requirements; (f) measures to properly control exotic vegetation on-site; (g) site-specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; (j) a summary of the annual reporting requirements; and (k) identification of the responsible party(ies) for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

BIO-2 A qualified biologist shall monitor initial vegetation clearing, grubbing, and ground disturbance activities to ensure that activities occur within the approved limits of work and that protective measures (e.g., flagging, fencing, sloped excavations) are in place.

BIO-3 Project activities that could result in vegetation removal, permanent habitat modification, and/or ground disturbance activities within suitable habitat for the coastal California gnatcatcher shall occur outside of its breeding season (February 15 through August 30). If such activities are unavoidable during the breeding season, focused protocol surveys shall be

conducted prior to conducting the activities. Surveys shall follow the current United States Fish and Wildlife Service protocol. If coastal California gnatcatchers are determined to occur within or adjacent to the proposed Project footprint, consultation with the United States Fish and Wildlife Service under the Federal Endangered Species Act, shall be initiated, and any resulting mitigation measures (including but not limited to breeding season activity restrictions and/or habitat-based compensatory mitigation) identified during consultation shall be implemented.

BIO-4 Clearing or grubbing of vegetation during the general bird breeding season (February 15 through September 15) or raptor breeding season (January 15 through July 15) shall be avoided except as outlined by this measure. If clearing and grubbing of vegetation is unavoidable during the breeding season, a pre-construction survey shall be conducted by a qualified biologist no more than seven days prior to conducting work in the Project footprint to determine if active bird nests are present. If no nesting birds are documented within the Project footprint, clearing, grubbing, and grading shall be allowed to proceed. If an active nest is observed within the Project footprint, the qualified biologist shall determine an appropriate buffer around the nest based on the biology of the species and the specific Project footprint constraints. Activities shall not occur within the buffer area until the qualified biologist has determined that the nest is no longer active, young have fledged, or determined which activities within the buffer would not jeopardize nesting success. The buffer area shall be demarcated in the field with flagging, stakes, and/or temporary fencing. The nesting buffer may be determined and adjusted depending on the species present, individual Project activities, site constraints, and in consultation with applicable wildlife agencies.

Cultural Resources

CUL-1 Prior to grading activities, a qualified archaeological monitor shall be identified to be on call during ground-disturbing activities. If archeological resources are discovered during excavation and/or construction activities, construction shall stop within 100 feet of the find, and the qualified archaeologist shall be consulted to determine whether the resource requires further study. The archaeologist shall make recommendations to the District to protect the discovered resources.

If the resources are deemed to be non-tribal, the archaeological resources recovered shall be provided to the South Coastal Information Center and the San Diego Natural History Museum, or any other local museum or repository willing and able to accept and house the resource to preserve for future scientific study.

If the resources are deemed to be tribal-related, the qualified archaeological monitor will determine the most closely-related tribe and contact the tribe to assess the significance of the find as well, in order to obtain recommendations on how best to proceed. Tribal-related archaeological resources discovered will be left in place in order to minimize handling until consultation with the qualified archaeological monitor and tribal monitor can be arranged in

order to determine the appropriate next steps. Continued work in the area of the archaeological find will only proceed after authorization from the District in coordination with the tribal monitor and the qualified archaeological monitor.

Geology and Soils

GEO-1 The District shall incorporate the recommendations of the final Geotechnical report prepared by Ninyo and Moore (Appendix C) into the project plans. The project's building plans shall demonstrate that they incorporate all applicable recommendations of the Geotechnical report and comply with all applicable requirements of the latest adopted version of the California Building Code.

GEO-2 Prior to construction, the District shall identify a qualified paleontologist to be on-call. If unique paleontological resources are discovered during excavation and/or construction activities, construction shall stop within 50 feet of the find, and the qualified paleontologist shall be consulted to determine whether the resource requires further study. The paleontologist shall make recommendations to the District to protect the discovered resources. Any paleontological resources recovered shall be provided to the South Coastal Information Center and the San Diego Natural History Museum, or any other local museum or repository willing and able to accept and house the resource to preserve for future scientific study.

Hydrology and Water Quality

Implement Mitigation Measure GEO-1.

Tribal Cultural Resources

Implement Mitigation Measure CUL-1.

2. Environmental Checklist

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3. Environmental Analysis

3.1 AESTHETICS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. 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	

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

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. There are no designated scenic vistas in the vicinity of the project site according to the City of San Diego General Plan and the San Ysidro Community Plan and Local Coastal Program Land Use Plan (San Ysidro Community Plan). The project site is not visible from the designated scenic overlooks shown in the San Ysidro Community Plan, Figure 4-21, Scenic Overlooks and Vistas. The future Beyer Park to the east of the site may provide views of scenic resources. However, the project site is at a lower elevation than the future Beyer Park and would not impact views of or from the park. Additionally, the proposed building would be in the northern portion of the site, adjacent to the residential uses to the north. Therefore, the proposed project would have a less than significant impact.

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

No Impact. The closest designated state scenic highway is State Route 75 (SR-75), which is approximately 5.2 miles northwest of the project site (Caltrans 2024). Additionally, I-5, which is 0.32-mile south of the project site, is designated as an eligible scenic highway. Due to the distance and intervening structures, project

development would not result in impacts to scenic resources within a designated state scenic highway. Therefore, no impact would occur.

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

Less Than Significant Impact. The project site is surrounded by residential uses to the north and west, and is consistent with the RS-1-7 zoning, which conditionally permits educational facilities. The project site, which was formerly the Beyer Elementary School site, is vacant. As indicated in Impact 3.1(a), there are no designated scenic vistas or resources in the area. Though the future Beyer Park, east of the project site, may provide views of scenic resources, the project site is at a lower elevation than the park and the proposed building would be constructed in the northern portion of the site, adjacent to the residential uses to the north of the project site.

Additionally, the proposed project would not substantially change the character of the surrounding area. Building materials and colors would complement the existing development on adjacent properties. The building would consist of white stucco, blue accent tiles, and terracotta tile roofing. Although the visual qualities of the project site during construction would not appear better than the existing condition of the property, the construction worksite would be temporary. The finished project would include landscaping and ornamental trees, ornamental fencing, and a new building with exterior finishes that complement the design and color of the surrounding development. Although project implementation would alter the visual appearance of the site and surrounding areas, the proposed project would not substantially degrade the visual character and quality of the surrounding area. Therefore, impacts would be less than significant.

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

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

The project site is currently undeveloped and does not generate light or glare; however, vehicle headlights, streetlights, and exterior and interior building lights exist in the surrounding area. The proposed project would include walkway and security lighting but no sports lights are proposed. Additionally, the proposed building would include a stucco exterior that is not reflective. The proposed lighting would be directed onto the intended area to be lit and would not spill off the project site, and landscaping would be planted on the northern and western portions of the site. The proposed project would also be required to comply with the lighting regulations in Section 142.0740, Outdoor Lighting Regulations, of the City of San Diego Municipal Code, which would ensure lighting impacts of outdoor lighting fixtures are reduced. Therefore, impacts would be less than significant.

3.2 AGRICULTURE AND FORESTRY RESOURCES

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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:**					
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

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?

No Impact. The project site has no agricultural or farm use on it, nor is there agricultural or farm use in its immediate proximity. No project-related farmland conversion impact would occur. The project site is not

mapped as important farmland by the Division of Land Resource Protection; the site is mapped as "Other Land," which is land that is not suitable for livestock grazing, confined livestock, or poultry or aquaculture facilities (CDC 2024a). No impact would occur.

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

No Impact. The zoning designation for the project site is RS-1-7, which is most widely used for single-family residential zoning. The proposed project would not conflict with agricultural zoning or a Williamson Act contract as it is not zoned for agricultural use. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no Williamson Act contract in effect onsite; the site was formerly the Beyer Elementary school site. No impact would occur.

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

No Impact. Project development would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits" (California PRC § 12220[g]). Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including trees" (California PRC § 4526). The project site is zoned as RS-1-7. No impact would occur.

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

No Impact. Vegetation onsite is limited to ruderal vegetation and scattered trees. The proposed project would not result in the loss or conversion of forest land. No impact would occur.

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

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

3.3 AIR QUALITY

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3. 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	

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

- *Air Quality and Greenhouse Gas Appendix*, PlaceWorks, January 31, 2025

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

The Air Quality section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthy pollutant concentrations. The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), 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 ozone (1-Hour), PM_{10}, and $PM_{2.5}$ and designated under both the California AAQS and the Federal AAQS as nonattainment for O_3 (8-Hour) (SDAPCD 2024a).

This section analyzes the types and quantities of air pollutant emissions that would be generated by the construction and operation of the proposed project. Air quality impacts are evaluated in accordance with the SDAPCD's *Environmental Review Guidelines, Procedures for Implementing the California Environmental Quality Act* and the City of San Diego *California Environmental Quality Act Significance Determination Thresholds*, which provides local governments with guidance for analyzing and mitigating project-specific air quality impacts (SDAPCD 2024b, San Diego 2022a). Emissions modeling was conducted with the most recent version of CalEEMod (Version 2022.1). 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 A to this Initial Study.

3. Environmental Analysis

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?

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 region's most current RAQS is the 2022 RAQS adopted in March 2023 (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.

The proposed project would provide educational and executive services at the former Beyer Elementary School campus. Construction of the proposed project would not create a significant number of new employment opportunities that could result in a greater demand for local housing, as construction work would be considered temporary, and workers would come from the region. During operational activities, the proposed project would employ up to 35 employees on a typical day and would not result in a significant relocation of employees or substantial unplanned growth to the region due to the size of the existing labor pool in the area. Therefore, the proposed project would not have the potential to substantially affect housing, employment, and population projections within the San Diego region, which is the basis of the RAQS projections.

The proposed project is in the community of San Ysidro within the City of San Diego and would be subject to the City of San Diego thresholds under the SDAPCD. Projects whose stationary source emissions do not exceed the City of San Diego's emission thresholds would not be considered to violate an air quality standard or contribute substantially to an existing or projected air quality violation. As described in Impact 3.3b, the proposed project's short-term construction and long-term operational emissions would not result in significant impacts compared to the City of San Diego's regional significance thresholds, which are based on SDAPCD Table A-2, *SDAPCD Pollutant Thresholds for Stationary Sources* (San Diego 2022a). 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. As stated previously, **t**he SDAB is designated under the California and Federal AAQS as nonattainment for O_3 (8-Hour) and under the California AAQS as nonattainment for O_3 (1-Hour), PM_{10}, and $PM_{2.5}$ (SDACPD 2024). The SDAPCD recently released air quality guidelines for implementing CEQA (SDAPCD 2024b). In addition, the project site is within the City of San Diego; therefore, the City of San Diego's CEQA Significance Determination Thresholds are used to evaluate the proposed project's air quality impacts (San Diego 2022a). Any project that produces a significant project-level regional air quality impact in an area that is designated as nonattainment would substantially contribute to the cumulative impact.

While development projects below the City of San Diego's 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 proposed 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.

The proposed project would be constructed in one phase, with construction activities anticipated to begin in October 2025 and be completed in December 2026. Construction activities would include asphalt demolition, site preparation, rough and fine grading, utility trenching, building construction, asphalt paving, architectural coating, and finishing/landscaping. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1., and results of the modeling are included in Table 1, *Maximum Daily and Annual Regional Construction Emissions*.

Table 1 Maximum Daily and Annual Regional Construction Emissions

Construction Phase	Pollutants (lbs/day)[1, 2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 2025						
Asphalt Demolition	2	16	17	<1	2	1
Site Preparation	4	44	40	<1	13	6
Rough Grading	2	34	30	<1	8	3
Fine Grading	4	144	70	1	30	10
Utility Trenching	<1	4	6	<1	<1	<1
Building Construction	1	11	15	<1	1	<1
Year 2026						
Building Construction 2026	1	11	15	<1	1	<1
Building Construction and Asphalt Paving	2	18	25	<1	1	1
Building Construction, Asphalt Paving, and Architectural Coating	4	19	26	<1	1	1
Building Construction, Asphalt Paving, Architectural Coating, and Finishing/Landscaping	5	26	36	<1	1	1
Building Construction, Architectural Coating, and Finishing/Landscaping	4	19	25	<1	1	1
Maximum Daily Emissions (lbs/day)	5	144	70	1	30	10
Significance Thresholds	**137**	**250**	**550**	**250**	**100**	**55**
Significant?	No	No	No	No	No	No

3. Environmental Analysis

Table 1 Maximum Daily and Annual Regional Construction Emissions

Construction Phase	Pollutants (lbs/day)[1, 2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Annual Construction Emissions						
2025	<1	<1	<1	<1	<1	<1
2026	<1	2	2	<1	<1	<1
Maximum Annual Emissions (tons/year)	<1	2	2	<1	<1	<1
Significance Thresholds	**15**	**40**	**100**	**40**	**15**	**10**
Significant?	No	No	No	No	No	No

Source: CalEEMod, Version 2022.1.; San Diego 2022a.
Notes: Based on SDAPCD Rule 1501, 20.2(d)(2).
[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 Table 1, maximum daily and annual emissions from project-related construction activities would not exceed the regional emissions thresholds. Therefore, criteria pollutant emissions generated during construction of the proposed project would not 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. 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 include a 17,100-square-foot building, recreational facilities, ornamental landscaping, parking lot and drop-off zone, and fencing around the perimeter of the project site. The CERC building would, at a minimum, be designed and built to meet the latest Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen). In addition, the outdoor event space and recreational facilities would be open to the public and would provide space for community gatherings, rallies, and similar large-scale assemblies. As described in the traffic impact study, the community resource center would generate 132 average daily vehicle trips to the project site.

Table 2, *Maximum Daily and Annual Operation Emissions,* shows the proposed project's maximum daily and annual emissions.

Table 2 Maximum Daily and Annual Regional Operation Emissions

Source	Pollutants (Average lbs/day)[1, 2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Daily Construction Emissions						
Mobile[1]	<1	<1	4	<1	1	<1
Area	1	<1	1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Maximum Daily Emissions (lbs/day)	1	<1	5	<1	1	<1
Significance Thresholds	**137**	**250**	**550**	**250**	**100**	**55**
Significant?	No	No	No	No	No	No
Annual Construction Emissions						
Mobile[1]	<1	<1	1	<1	<1	<1
Area	<1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Maximum Annual Emissions (tons/year)	<1	<1	1	<1	<1	<1
Significance Thresholds	**15**	**40**	**100**	**40**	**15**	**10**
Significant?	No	No	No	No	No	No

Source: CalEEMod, Version 2022.1.; San Diego 2022a.
Notes: Based on SDAPCD Rule 1501, 20.2(d)(2). lbs: Pounds. For maximum daily emissions the highest winter or summer emissions are reported.
[1] Based on 132 average daily vehicle trips provided by Garland Associates, 2025.

As shown in Table 2, the proposed project's maximum daily and annual emissions would not exceed the regional operational emissions thresholds. Impacts to the regional air quality associated with operation of the proposed 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 SDACPD's new adopted *Environmental Review Guidelines, Procedures for Implementing the California Environmental Quality Act*, a project whose stationary source emissions do not exceed or can be mitigated to less than the thresholds identified for construction and operational impacts identified in Table 1 and Table 2 would not be considered to violate an air quality standard or contribute substantially to an existing or projected air quality violation (SDAPCD 2024b, 2025). 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, including $PM_{2.5}$ concentrations.[1] As identified in Impact 3.3b, onsite construction and operation of

[1] Based on personal communication with Stephen Amberg, SDAPCD Program Coordinator, in regard to evaluating localized health risk impacts in compliance with SDAPCD CEQA Guidelines.

the proposed project would be substantially below the regional significance thresholds; and therefore, localized emissions are also considered 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. Currently, the Proposed 2023 Revision to the California SIP for Carbon Monoxide (2023 CO SIP revision) is updating the 2004 CO Maintenance Plan to remove the contingency measures and monitoring requirement for 3 of the 10 maintenance areas included in the 2004 CO Maintenance Plan, which includes Chico, Modesto, and Stockton Urbanized Areas (CARB 2024).

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). Based on the traffic impact analysis, the Beyer Boulevard at the segment West of Beyer Boulevard and Otay Mesa would yield the greatest traffic volumes of 7,787 average daily vehicle trips (ADT) during buildout year (Appendix E). Based on a transportation industry assumption that hourly peak hour trips are 10 percent of average daily counts, the proposed project would not increase peak hour traffic volumes at affected intersections to more than the BAAQMD's screening criteria of 44,000 vehicles per hour, or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited. 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, the proposed project would not introduce new vehicle trips which may result in a CO hotspot when combined with existing traffic volumes and 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 has developed a cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM.

The proposed project would be developed in approximately 14 months, which would limit the exposure to onsite and offsite receptors. In addition, construction activities would not exceed the significance thresholds. For the reasons stated above, construction emissions would not expose onsite and offsite receptors at or near the project site to substantial pollutant concentrations, 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 and typically do not exacerbate existing hazards, so these thresholds are typically applied to new industrial projects.

The proposed project would not include uses typically associated with generating substantial stationary sources of emissions. While operation of the CERC building would use standard onsite mechanical equipment (such as heating, ventilation, and air conditioning system), air pollutant emissions would be nominal. 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 involves construction of the CERC building and various site improvements to provide educational and executive services. Therefore, operation of the proposed project would not fall within the objectionable odors land uses. 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

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

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

- *Beyer Community Resources Center Project Biological Resources Letter Report*, Blackhawk Environmental, Inc., August 15, 2024

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

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?

Less Than Significant Impact with Mitigation Incorporated. The project site is undeveloped and was formerly the Beyer Elementary School site. The project site is surrounded by residential uses and vacant/open space. The Biological Resources Report indicated that the literature search resulted in 10 sensitive wildlife species; however, the field evaluation determined that the project site was not suitable for six of these species

based on the lack of suitable habitat and/or soils (Blackhawk 2024). One species was present on the project site—coastal California gnatcatcher (*Polioptila californica californica*)—and the remaining three species have a moderate potential to occur within the project site due to being previously documented within one mile of the site and the presence of suitable Diegan Coastal Sage Scrub – Disturbed habitat. These species are Blainville's horned lizard (*Phrynosoma blainvillii*; Species of Special Concern [SSC]), California glossy snake (*Arizona elegans occidentalis*; SSC), and the Southern California legless lizard (*Anniella stebbinsi*; SSC).

The Biological Resources Report indicated that a total of 19 plant species were evaluated for potential to occur within the project site. The field evaluation determined that 18 plant species are absent from the project site and have no potential to occur due to lack of connectivity to source populations, lack of suitable habitat, lack of suitable soils, and/or level of anthropogenic disturbance. Furthermore, the June 2024 field survey was conducted during the blooming period of many of the target species, making them identifiable if present, or as perennial shrubs they would have been identified if present. One species, the San Diego bursage (*Ambrosia chenopodiifolia*) is present as a component of the Diegan Coastal Sage Scrub – Disturbed habitat within the project site.

Because development of the proposed project has the potential to impact Diegan Coastal Sage Scrub – Disturbed habitat, Mitigation Measure BIO-1 would be required to reduce impacts. Similarly, the implementation of Mitigation Measure BIO-2 through Mitigation Measure BIO-4 would be required to reduce impacts to sensitive wildlife species as a result of the proposed project. Therefore, impacts would be less than significant with mitigation incorporated.

Mitigation Measures

BIO-1 Permanent impacts to Diegan Coastal Sage Scrub – Disturbed habitat shall be offset through mitigation of habitat of equal or higher biological value at a one-to-one ratio. Prior to ground-disturbing activities, the District shall ensure that mitigation occurs by implementing one or a combination of the following: off-site or on-site preservation, enhancement, restoration, and/or creation of habitat; purchase of habitat mitigation credits from an approved mitigation area or bank, or other location deemed acceptable by the applicable regulatory agencies. If on-site preservation, enhancement, restoration, and/or creation of habitat is chosen, a restoration plan shall be prepared by qualified personnel with experience in Southern California ecosystems and native plant restoration techniques. At a minimum, the restoration plan shall include the following information: (a) the location of the mitigation site(s); (b) a schematic depicting the mitigation areas; (c) the plant species to be used, container sizes, and seeding rates; (d) a planting schedule; (e) a description of installation requirements, irrigation sources and methodology, erosion control, maintenance and monitoring requirements; (f) measures to properly control exotic vegetation on-site; (g) site-specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; (j) a summary of the annual reporting requirements; and (k) identification of the responsible party(ies) for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

BIO-2 A qualified biologist shall monitor initial vegetation clearing, grubbing, and ground disturbance activities to ensure that activities occur within the approved limits of work and that protective measures (e.g., flagging, fencing, sloped excavations) are in place.

BIO-3 Project activities that could result in vegetation removal, permanent habitat modification, and/or ground disturbance activities within suitable habitat for the coastal California gnatcatcher shall occur outside of its breeding season (February 15 through August 30). If such activities are unavoidable during the breeding season, focused protocol surveys shall be conducted prior to conducting the activities. Surveys shall follow the current United States Fish and Wildlife Service protocol. If coastal California gnatcatchers are determined to occur within or adjacent to the proposed Project footprint, consultation with the United States Fish and Wildlife Service under the Federal Endangered Species Act, shall be initiated, and any resulting mitigation measures (including but not limited to breeding season activity restrictions and/or habitat-based compensatory mitigation) identified during consultation shall be implemented.

BIO-4 Clearing or grubbing of vegetation during the general bird breeding season (February 15 through September 15) or raptor breeding season (January 15 through July 15) shall be avoided except as outlined by this measure. If clearing and grubbing of vegetation is unavoidable during the breeding season, a pre-construction survey shall be conducted by a qualified biologist no more than seven days prior to conducting work in the Project footprint to determine if active bird nests are present. If no nesting birds are documented within the Project footprint, clearing, grubbing, and grading shall be allowed to proceed. If an active nest is observed within the Project footprint, the qualified biologist shall determine an appropriate buffer around the nest based on the biology of the species and the specific Project footprint constraints. Activities shall not occur within the buffer area until the qualified biologist has determined that the nest is no longer active, young have fledged, or determined which activities within the buffer would not jeopardize nesting success. The buffer area shall be demarcated in the field with flagging, stakes, and/or temporary fencing. The nesting buffer may be determined and adjusted depending on the species present, individual Project activities, site constraints, and in consultation with applicable wildlife agencies.

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?

Less Than Significant With Mitigation Incorporated. The project site was formerly developed with the Beyer Elementary School and is currently vacant. No riparian habitats are identified onsite (USFWS 2024). However, the San Diego bursage (*Ambrosia chenopodiifolia*) is present as a component of the Diegan Coastal Sage Scrub – Disturbed habitat within the project site. Because development of the proposed project has the potential to impact Diegan Coastal Sage Scrub – Disturbed habitat, Mitigation Measure BIO-1 would be required to reduce impacts. Upon incorporation of Mitigation Measure BIO-1, impacts would be less than significant.

Mitigation Measures

Implement Mitigation Measure BIO-1.

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

No Impact. The project site has no wetland or drainage areas that have been identified onsite (USFWS 2024). Therefore, no impacts would occur.

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

Less than Significant Impact. Wildlife movement corridors facilitate movement of species between large patches of natural habitat. The entire project site is fenced with six- to eight-foot-tall fencing that restricts movement of large mammals such as mule deer (*Odocoileus hemionus*) and coyote (*Canis latrans*); therefore, the project site does not function as a wildlife movement corridor. However, due to its openness, the project site provides raptor foraging opportunities. Trees onsite could be used for nesting by birds protected under the Migratory Bird Treaty Act (MBTA) (US Code Title 16, Sections 703–712), and California Fish and Game Code Sections 3503 et seq.

Compliance with the MBTA requires:

- Avoiding grading activities during the nesting season, February 15 to August 15.
- Or, if grading activities are to be undertaken during the nesting season, a site survey for nesting birds by a qualified biologist before commencement of grading activities. If nesting birds are found, the applicant would consult with the USFWS regarding means to avoid or minimize impacts to nesting birds.

Impacts would be less than significant with compliance with the MBTA.

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

Less Than Significant With Mitigation Incorporated. The City's Municipal Code includes ordinances protecting trees and environmentally sensitive lands. One species was present within the project site: coastal California gnatcatcher (*Polioptila californica californica*). Blainville's horned lizard (*Phrynosoma blainvillii*; [SSC]), California glossy snake (*Arizona elegans occidentalis*; SSC), and the Southern California legless lizard (*Anniella stebbinsi*; SSC) have a moderate potential to occur within the project site due to being previously documented within one mile of the site and the presence of suitable Diegan Coastal Sage Scrub – Disturbed habitat. Because development of the proposed project has the potential to impact Diegan Coastal Sage Scrub – Disturbed habitat, Mitigation Measure BIO-1 would be required to reduce impacts. Similarly, the implementation of Mitigation Measure BIO-2 through Mitigation Measure BIO-4 would be required to reduce impacts to sensitive

wildlife species as a result of the proposed project. Therefore, impacts would be less than significant with Mitigation Measure BIO-1 through Mitigation Measure BIO-4 incorporated.

Additionally, the proposed project would not remove or plant trees within the public right-of-way. The project site was formerly developed and is currently vacant. The proposed project would be required to comply with all applicable regulations pertaining to the protection of biological resources. Therefore, with the implementation of Mitigation Measure BIO-1 through Mitigation Measure BIO-4, the proposed project would be consistent with the City's Municipal Code and impacts would be reduced to less than significant.

Mitigation Measures

Implement Mitigation Measure BIO-1 through Mitigation Measure BIO-4.

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

No Impact. The project site is not within the Multi-Habitat Planning Area of the Multi-Species Conservation Program (MSCP). Therefore, the proposed project would not conflict with the provisions of the MSCP. No impact would occur.

3.5 CULTURAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
5. 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	

Would the project:

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

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

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

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

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

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

The project site is undeveloped and vacant. There are no state or national historic resources on the project site (NPS 2024; OHP 2024). Construction of the proposed project would occur within the project site boundary. Therefore, no impacts 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 require ground disturbing activities such as ground clearing, excavation, grading, and other construction activities. Although the project site has been previously disturbed with the past development of the Beyer Elementary School, potential buried resources could be unearthed during ground disturbing activities. 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 monitor 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 Prior to grading activities, a qualified archaeological monitor shall be identified to be on call during ground-disturbing activities. If archeological resources are discovered during excavation and/or construction activities, construction shall stop within 100 feet of the find, and the qualified archaeologist shall be consulted to determine whether the resource requires further study. The archaeologist shall make recommendations to the District to protect the discovered resources.

If the resources are deemed to be non-tribal, the archaeological resources recovered shall be provided to the South Coastal Information Center and the San Diego Natural History Museum, or any other local museum or repository willing and able to accept and house the resource to preserve for future scientific study.

If the resources are deemed to be tribal-related, the qualified archaeological monitor will determine the most closely-related tribe and contact the tribe to assess the significance of the find as well, in order to obtain recommendations on how best to proceed. Tribal-related archaeological resources discovered will be left in place in order to minimize handling until consultation with the qualified archaeological monitor and tribal monitor can be arranged in order to determine the appropriate next steps. Continued work in the area of the

archaeological find will only proceed after authorization from the District in coordination with the tribal monitor and the qualified archaeological monitor.

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

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

3.6 ENERGY

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
6. 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	

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

- Appendix A, *Air Quality and Greenhouse Gas Appendix*, PlaceWorks, January 31, 2025

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

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?

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

Short-Term Construction Impacts

Electrical Energy

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 large off-road 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 the construction equipment used for the proposed project would be powered by natural gas. Therefore, no impacts would result from 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, such as those used during asphalt demolition, site preparation, and grading activities, would be gas or diesel powered.

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. Furthermore, to limit wasteful and unnecessary energy consumption, the construction contractors would minimize nonessential idling of construction equipment, in accordance with the California Code of Regulations, Title 13, Article 4.8, Chapter 9, Section 2449.

Construction trips would also not result in unnecessary use of energy since the project site is centrally located and is served by regional freeway systems (e.g., I-805 and I-5) that provide the most direct routes from various areas of the region. Therefore, energy use during construction of the proposed 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 (e.g., appliances and cooling), natural gas (e.g., heating), and transportation energy.

3. Environmental Analysis

Electrical and Natural Gas Energy

The proposed increase in electricity and natural gas consumption from the proposed project are shown in Table 3, *Operation-Related Energy Consumption*.

Table 3 Operation-Related Energy Consumption

Land Use	Electricity (kWh/year)	Natural Gas (kBTU/year)
Building Energy	283,767	547,594
Parking Lot	36,792	n/a

Source: CalEEMod Version 2022.1, see Appendix A.
Note: kWh=kilowatt-hour; kBTU = kilo British thermal unit

While the proposed project would generate additional energy demand at the site, it would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements. Compliance with the current Building Energy Efficiency Standards and CALGreen would be consistent with the goals outlined in Appendix F of the CEQA Guidelines, which would promote the use of renewable energy and decrease reliance on fossil fuels to meet the energy demands of the proposed project. The 2022 Building Energy Efficiency Standards include prescriptive photovoltaic (PV) system standards for non-residential land uses. Compliance with the prescriptive standards would result in the installation of on-site PV systems. Additionally, the CERC building would be equipped with cool/green roofs and low-flow appliances.

The 2022 Building Energy Efficiency Standards also have performance standards as an alternative to the prescriptive standards pathway for residential and nonresidential uses. Although the performance standards pathway does not require installation of a PV system, it does require land uses that would opt for this compliance option to achieve an energy-efficiency performance of the "Standard Design Building." As stated, the "Standard Design Building" represents the energy-efficiency performance of a project that includes all prescribed features (e.g., solar) with no additional energy-efficiency features beyond what is required at minimum under the mandatory requirements and prescriptive pathway. Therefore, projects that opt for the performance pathway would still achieve a similar level of energy efficiency as those that opt for compliance with the prescriptive pathway. Because the proposed project would comply with these regulations and would provide features to promote the use of renewable energy and energy efficiency, it would not result in wasteful, inefficient, or unnecessary electricity demands.

In addition to the proposed building energy efficiency, San Diego Gas & Electric (SDG&E) is required to comply with the state's renewable portfolios standard (RPS), which mandates utilities to procure a certain proportion of electricity from eligible renewable and carbon-free sources and increasing the proportion through the coming years with an ultimate procurement requirement of 100 percent by 2045. The RPS requirements would support the use of electricity by the proposed project that is generated from renewable or carbon-free sources.

Overall, the proposed project would generally be consistent with the goals outlined in Appendix F of the CEQA Guidelines regarding increasing energy efficiency, decreasing reliance on fossil fuels, and increasing renewable energy sources. Because the proposed project would comply with these regulations, it would not result in wasteful, inefficient, or unnecessary electricity and natural gas demands.

Transportation Energy

Buildout of the proposed project would consume transportation energy during operations from the use of motor vehicles associated with visitors and employees to the project site. Based on the traffic impact study, the proposed project would generate an increase of 132 average day vehicle trips and 317 peak day vehicle trips (Appendix E). As further described in Section 3.17, *Transportation*, the proposed project would be in the locally serving public facility category and, per the City of San Diego's "Transportation Study Manual," is not a land developed project that would result in a significant VMT impact. Therefore, operation of the proposed project would not contribute to a substantial increase in VMT and transportation fuel usage.

Moreover, fuel efficiency of vehicles after buildout would on average improve compared to vehicle fuel efficiencies experienced under existing conditions, resulting in a lower per capita fuel consumption, assuming travel distances, travel modes, and trip rates remain the same. The improvement in fuel efficiency would be attributable to the statewide fuel reduction strategies and regulatory compliances (e.g., Corporate Average Fuel Economy [CAFE] standards), resulting in new cars that are more fuel efficient and the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to land use development projects, but to car manufacturers. Therefore, the visitors and employees of the proposed project do not have direct control in determining the fuel efficiency of vehicles that are manufactured and available. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing more fuel-efficient vehicle options. 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 the RPS Program. Eligible renewable sources under the RPS include wind, small hydropower, solar, geothermal, biomass, and biogas. The RPS goals have been updated since adoption of SB 1078 in 2002. In general, California has RPS requirements of 50 percent by 2026 (SB 100), 60 percent by 2030 (SB 100), 90 percent by 2035 (SB 1020), and 100 percent carbon free by 2045 (SB 100 and SB 1020).

The statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers such as SDG&E, whose compliance with RPS requirements would contribute to the state objective of transitioning to renewable energy. As previously stated, the proposed project would be required to comply with the current Building Energy Efficiency Standards. Therefore, implementation of the proposed project would not conflict with or obstruct implementation of California's RPS program or other plans or policies adopted for renewable energy and energy efficiency. Impacts would be less than significant.

3. Environmental Analysis

City of San Diego Climate Action Plan

The 2022 Climate Action Plan (2022 CAP) includes six equity-focused strategies to achieve a goal of net zero emissions by 2035 through reducing and avoiding GHG emissions. As demonstrated in Table 5, *Project Consistency with the City of San Diego 2022 CAP*, in Section 3.8, *Greenhouse Gas Emissions,* the proposed project would be consistent with the applicable energy-related 2022 CAP strategies. Therefore, the proposed project would not conflict or obstruct implementation of the City's CAP, and impacts would be less than significant.

3.7 GEOLOGY AND SOILS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
7. 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		

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

Geotechnical Evaluation: Beyer Community Resource Center, Ninyo and Moore Geotechnical and Environmental Sciences Consultants, February 6, 2025

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

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.

Less Than Significant Impact. The project site is not in an Alquist-Priolo Earthquake Fault Zone and no active fault lines traverse the site (CDC 2024b; Ninyo and Moore 2025). The nearest active fault to the project site, the Rose Canyon Fault, has been mapped approximately 6.3 miles west of the project site. In addition, the inactive La Nacion fault trends north-south along the eastern side of the site (Ninyo and Moore 2025). Therefore, impacts would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. According to the Geotechnical report, the site is not underlain by known active or potentially active faults, and the site is not within an Alquist-Priolo Zone. However, like the majority of Southern California, the site is in a seismically active area, and the potential for strong ground motion exists (Ninyo and Moore 2025). The nearest active fault is the Rose Canyon Fault located approximately 6.3 miles west of the site. The proposed project would be constructed to meet the latest California Building Code (CBC) and DSA requirements, which would reduce impacts from ground shaking. Impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based on three main contributing factors: 1) cohesionless, granular soils having relatively low densities (usually of Holocene age); 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking. According to the Geotechnical report, based on the absence of shallow groundwater along with the cemented and dense nature of the underlying formational materials, liquefaction and seismically-induced settlement are not anticipated (Ninyo and Moore 2025). Therefore, impacts would be less than significant.

iv) Landslides?

Less Than Significant Impact. Landsliding is a type of erosion in which masses of earth and rock move downslope as a single unit. The eastern portion of the site is mapped as "most susceptible" to landsliding while the western portion of the site is mapped as being "generally susceptible" (Ninyo and Moore 2025). However, based on the site reconnaissance, and review of applicable hazards and geologic maps and aerial photographs, landslides or indications of deep-seated slope instability were not observed at the project site (Ninyo and Moore 2025). Furthermore, all structures on the site would comply with the most recent version

of the CBC as well as the DSA criteria, which provides minimum standards to protect property and public welfare by regulating design and construction to reduce the effects of adverse soil conditions. Therefore, 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 project site is currently undeveloped, and the proposed project would include pervious and impervious surfaces. The proposed project would implement structural and nonstructural best management practices (BMPs) before and after construction to control surface runoff and erosion to retain sediment on the project site. Therefore, 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 previously discussed in Impacts 3.7(a)(iii and iv), the project site is not within an area subject to landslides or liquefaction. Additionally, compliance with the most current CBC and DSA criteria would reduce potential impacts related to liquefaction and landslides to less than significant.

Subsidence of basins attributed to overdraft of groundwater aquifers or over pumping of petroleum reserves has been reported in various parts of California. Collapsible soils may appear strong and stable in their natural (dry) state, but they rapidly consolidate under wetting, generating large and often unexpected settlements. Seismically-induced settlement consists of dynamic settlement of unsaturated soil (above groundwater) and liquefaction-induced settlement (below groundwater). These settlements occur primarily in low-density sandy soil due to the reduction in volume during and shortly after an earthquake. The proposed project would not require withdrawal of groundwater from the site, and is not within areas of land subsidence according to the US Geological Survey (USGS 2025). Additionally, the proposed project would be required to comply with the CBC and DSA criteria which would ensure adequate design and construction of building foundations to resist soil movement. Therefore, impacts would be less than significant.

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

Less Than Significant Impact With Mitigation Incorporated. Expansive soils swell when they become wet and shrink when they dry out resulting in the potential for cracked building foundations. According to laboratory testing, soils onsite have a medium to high potential for expansion to occur (Ninyo and Moore 2025). The Geotechnical report states that areas where clays exhibit a medium to high expansion index should be selectively graded to segregate the unsuitable expansive materials from the low expansive materials; the proposed project would implement Mitigation Measure GEO-1 to reduce impacts to less than significant. Additionally, the proposed project would adhere to the most recent version of the CBC and DSA criteria. Therefore, impacts would be less than significant with mitigation incorporated.

Mitigation Measures

GEO-1 The District shall incorporate the recommendations of the final Geotechnical report prepared by Ninyo and Moore (Appendix C) into the project plans. The project's building plans shall demonstrate that they incorporate all applicable recommendations of the Geotechnical report and comply with all applicable requirements of the latest adopted version of the California Building Code.

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

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

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

Less Than Significant Impact With Mitigation Incorporated. The project site was formerly the Beyer Elementary School site, and therefore was previously disturbed. While it is unlikely that the proposed construction activities would uncover paleontological resources, because the proposed project would require ground-disturbing activities, the proposed project would comply with the grading requirements in Section 142.0151, Paleontological Resources Requirements for Grading Activities, in the City's Municipal Code. Additionally, the proposed project would implement Mitigation Measure GEO-2, which would ensure that if resources are discovered during ground-disturbing activities, that resources would be recovered in accordance with applicable requirements. Implementation of Mitigation Measure GEO-2 would reduce impacts to less than significant.

Mitigation Measures

GEO-2 Prior to construction, the District shall identify a qualified paleontologist to be on-call. If unique paleontological resources are discovered during excavation and/or construction activities, construction shall stop within 50 feet of the find, and the qualified paleontologist shall be consulted to determine whether the resource requires further study. The paleontologist shall make recommendations to the District to protect the discovered resources. Any paleontological resources recovered shall be provided to the South Coastal Information Center and the San Diego Natural History Museum, or any other local museum or repository willing and able to accept and house the resource to preserve for future scientific study.

3.8 GREENHOUSE GAS EMISSIONS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
8. 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

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

- *Air Quality and Greenhouse Gas Appendix*, PlaceWorks, January 31, 2025

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

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHG), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[2]

Information on the manufacture of cement, steel, and other "life cycle" emissions that would occur as a result of the proposed project are not applicable and are not included in the analysis.[3] Black carbon emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this short-lived climate pollutant in the state's Senate Bill 32 (SB 32) and Assembly Bill (AB 1279) inventory but treats it

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

[3] 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).

separately.[4] A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

Methodology

City of San Diego's CEQA Significance Determination Thresholds

GHG impacts are evaluated in accordance with the City of San Diego's *California Environmental Quality Act Significance Determination Thresholds* (San Diego 2022a). The City's CEQA Significance Determination Thresholds for GHG cross-reference the CEQA Guidelines Sections 15183.5(b), 15064(h)(3), and 15130(d), which allow for mitigating cumulative GHG impacts through adoption of a plan for the reduction of GHG emissions.

City of San Diego Climate Action Plan

In December 2015, the City adopted a CAP that provided a roadmap for the City to reduce carbon emissions in a cost-effective manner. The 2015 CAP identified five strategies to reduce GHG emissions to meet the City's GHG reduction target of 15 percent below the 2010 baseline levels by 2020 (aligned with AB 32), 40 percent below the 2010 baseline levels by 2030 (aligned with SB 32), and 50 percent below the 2010 baseline levels by 2035. By meeting the 2035 target, the City will maintain its trajectory to meet its proportional share of the 2050 state target (80 percent below 1990 levels by 2050) (San Diego 2015). In August 2022, the City updated the CAP (2022 CAP), building on the 2015 CAP and establishing an updated community-wide goal of net zero by 2035 (aligned with AB 1279) (San Diego 2022b).

CEQA Guidelines Section 15183.5, Tiering and Streamlining the Analysis of Greenhouse Gas Emissions, allows for lead agencies to analyze and mitigate the significant effects of GHG emissions at a programmatic level. Pursuant to CEQA Guidelines Section 15183.5, later project-specific environmental documents may tier from and/or incorporate by reference the GHG reduction plan so long as it includes the following plan elements:

- **Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.** The San Diego CAP includes communitywide GHG emissions for existing conditions and emissions forecast for year 2030, 2035, and year 2050 for emissions sources in the City of San Diego. The inventory and forecast include emissions associated with schools and school-district-owned facilities within the City limits. For example, the energy sector (electricity and natural gas) includes building energy associated with all buildings within the City limits except the San Diego County Regional Airport Authority, San Diego Unified Port District, and the military, and the on-road transportation emissions include VMT from the SANDAG model that includes school- and district-owned facilities trips (since these trips have an origin or destination with the City limits).

[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).

- **Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable.** The San Diego CAP aligns the GHG emissions reduction targets for the City with the GHG reduction goals identified for Senate Bill 32 (for year 2030) and Assembly Bill 1279 (for the 2050 horizon year).

- **Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area.** The CAP identifies the business-as-usual forecast for emission sources within the City limits (including schools and district-owned facilities) and identifies the additional reductions needed to achieve the gap.

- **Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.** The CAP identifies specific measures and quantifies individual measures that would achieve the gap and achieve the City's local GHG reduction goals. As part of this, the 2015 CAP included a CAP Consistency Checklist to ensure that new development implements the mandatory measures of the CAP. The 2022 update to the CAP mandatory measures were codified as an amendment to the Land Development Code under Chapter 14, Article 3, Division 14: Climate Action Plan Consistency Regulations.

- **Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels.** The CAP was originally adopted in 2015 and updated in 2022. The 2022 CAP includes an implementation and monitoring plan to ensure tracking and monitoring. The City commits to providing an annual progress report and conducting comprehensive GHG emissions inventories at least every two years.

- **Be adopted in a public process following environmental review.** The City of San Diego prepared and certified the Climate Action Plan Program Environmental Impact Report (PEIR) (Project No. 416603/SCH No. 2015021053) in 2015. For the 2022 CAP update, which was adopted by the City Council in August 2022, the City prepared an Addendum. Therefore, the CAP was adopted in a public process following environmental review.

Based on the above, the San Diego CAP is a qualified GHG reduction plan. As described in Section 3.11, *Land Use and Planning,* the project site is zoned RS-1-7 and the existing land use designation is Institutional and Public and Semi-Public Facilities. Implementation of the proposed project would not change the zoning or land use designations of the site. The proposed project is generally consistent with the land use and zoning requirements of the project site and, consequently, emissions associated with the project development are included in GHG forecast in the CAP. Therefore, the proposed project's GHG emissions impacts are evaluated based on consistency with the CAP in accordance with CEQA Guidelines Section 15183.5.

Would the project:

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

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

As identified above, the City of San Diego's CAP is a qualified GHG reduction plan. Therefore, the proposed project's GHG emissions impacts are evaluated below based on consistency with the CAP in accordance with CEQA Guidelines Section 15183.5.

Net Increase in Emissions

Long-term operation of the proposed project would result in water demand, wastewater and solid waste generation, area sources (e.g., consumer cleaning products), energy usage (i.e., electricity), refrigerant use, and vehicle trips. The total long-term, operational GHG emissions that are associated with the proposed project are shown in Table 4, *Project-Related Operational GHG Emissions*.

Table 4 Project-Related Operational GHG Emissions

Source	GHG Emissions ($MTCO_2e$)	Percent of Total
Mobile[1]	130	75%
Area	<1	<1%
Energy	36	21%
Water	3	1%
Solid Waste	5	3%
Refrigerants	<1	<1%
Total	174	100%

Source: CalEEMod, Version 2022.1.
Notes: $MTCO_2e$ = metric tons carbon dioxide-equivalent
[1] Based on 132 average daily vehicle trips provided by Garland Associates, 2025.

City of San Diego Climate Action Plan

In August 2022, the City updated the CAP (2022 CAP) that built upon the 2015 CAP and established an updated community-wide goal of net zero by 2035 (aligned with AB 1279) (San Diego 2022b). The CAP identifies specific measures and quantifies individual measures that would achieve the City's local GHG reduction goals. The 2015 CAP included a CAP Consistency Checklist to ensure that new development implements the mandatory measures of the CAP. In the 2022 update to the CAP, mandatory measures were codified as an amendment to the Land Development Code under Chapter 14, Article 3, Division 14: Climate Action Plan Consistency Regulations.

3. Environmental Analysis

The first step in determining CAP consistency is to determine if the project is consistent with growth projections used in the development of the CAP. As described under "Methodology," above, the proposed project is generally consistent with the land use and zoning requirements of the project site.

The 2022 CAP includes six equity-focused strategies to achieve a goal of net zero emissions by 2035 through reducing and avoiding GHG emissions. The proposed project would be consistent with the applicable 2022 CAP strategies (shown in Table 5, *Project Consistency with the City of San Diego 2022 CAP*) and with the 2015 CAP Consistency Checklist (see Appendix A). Therefore, the proposed project would not interfere with the implementation of the City's CAP. Consequently, GHG emissions generated by the proposed project are considered less than significant and no mitigation measures are required.

Table 5 Project Consistency with the City of San Diego 2022 CAP

Applicable 2022 CAP Strategies	Consistency with 2022 CAP Strategies
Strategy 1: Decarbonization of the Built Environment	**Consistent.** The proposed project would be required to be constructed in accordance with current building codes in existence at the time of construction. The incorporation of building efficiency standards required by the Building Energy Efficiency Standards and CALGreen, which improve every 3 years, would serve to reduce embodied carbon emissions in construction. Additionally, the CERC building would be equipped with cool/green roofs and low-flow appliances. Therefore, the proposed project would be consistent with this CAP Strategy.
Strategy 2: Access to Clean and Renewable Energy	**Consistent.** The proposed project would be required to be constructed in accordance with current building codes in existence at the time of construction. The incorporation of building efficiency standards required by the Building Energy Efficiency Standards and CALGreen, which improve every 3 years, would serve to reduce unnecessary energy consumption. As described previously, the CERC building would be equipped with cool/green roofs and low-flow appliances. Additionally, the proposed project would provide electric vehicle infrastructure per CALGreen Nonresidential Mandatory Measures and provide outlets for electric charging at three bicycle spaces per the City's Municipal Code Section 143.1410(c). Therefore, the proposed project would be consistent with this CAP Strategy.
Strategy 3: Mobility and Land Use[1] Mobility and Land Use Regulations: Street Trees and Pedestrian Amenities: • **Section 143.1410 (a):** Pedestrian enhancements that reduce heat island effects shall be provided. • **Section 143.1410 (b):** Development on premises with 250 linear feet or more of street frontage shall provide and privately maintain at least one of the following publicly accessible pedestrian amenities for every 250 linear feet of street frontage. EV Bicycle Charging: • **Section 143.1410 (c)**: At least 50 percent of all residential and non-residential bicycle parking spaces shall be supplied with individual outlets for electric charging at each bicycle parking space.	**Consistent.** The proposed project would not adversely affect the performance of any roadway, transit, or non-motorized (pedestrian and bicycle) transportation facilities. Specifically, the proposed project would not alter the existing sidewalks or crosswalks near the project site, which would readily accommodate the anticipated pedestrian activity. San Diego Metropolitan Transit System (MTS) also operates Routes 906 and 907 along San Ysidro Boulevard. The closest bus stop near the project site is at the intersection of San Ysidro Boulevard and Center Street approximately one-quarter mile south of the project site. Furthermore, the proposed project would provide electric vehicle infrastructure, six short-term bicycle spaces, and long-term bicycle spaces per CALGreen Nonresidential Mandatory Measures.

Table 5 Project Consistency with the City of San Diego 2022 CAP

Applicable 2022 CAP Strategies	Consistency with 2022 CAP Strategies
	Not Applicable. To be consistent with the City's Municipal Code Section 143.1410(a) and (b), Mobility and Land Use Regulations, the proposed project would be required to provide 15 street trees and street frontage improvements for every 250 linear feet of street frontage. However, there is no room for vegetation in the right-of-way (ROW) as the project site abuts the sidewalk. Therefore, these requirement are infeasible and are not applicable to the proposed project. **Consistent.** Based on the City's Municipal Code Section 143.1410(c), the proposed project would comply and provide three individual outlets for electric charging out of six bicycle parking spaces. Therefore, the proposed project would help reduce mobile source emissions, be consistent with the Mobility Element of the City's General Plan and promote alternative modes of transportation. Overall, the proposed project would be consistent with this CAP Strategy.
Strategy 4: Circular Economy and Clean Communities	**Consistent.** The proposed project would comply with all regulations pertaining to solid waste, such as the California Integrated Waste Management Act and the City's recycling and waste programs. The District and its construction contractor would comply with all applicable laws and regulations to reuse and/or recycle the construction debris that would otherwise be taken to a landfill. Specifically, the proposed project would be required to comply with City's Municipal Code Chapter 6, Article 6, Division 6: Construction and Demolition Debris Diversion Deposit Program, in compliance with the AB 939 goal of diverting 50 percent of its waste from landfill disposal and achieving the diversion goals identified in the City's Zero Waste Plan. Furthermore, the District is required to complete a Waste Management Form to ensure the maximum amount of construction and demolition waste would be diverted. Therefore, the proposed project would be consistent with this CAP Strategy.
Strategy 5: Resilient Infrastructure and Healthy Ecosystems[1] Resilient Infrastructure and Healthy Ecosystems Regulations: • Section 143.1415 (a): Two trees shall be provided on the premises for every 5,000 square feet of lot area, with a minimum of one tree per premises.	**Consistent.** The proposed project would provide landscape areas in compliance with CALGreen Nonresidential Mandatory Measures and ornamental trees to provide shade. This would increase tree canopy over the buildings and hardscaped areas, reducing the energy needed to cool the CERC building. Additionally, the proposed project would be required to be constructed in accordance with the Municipal Separate Storm Sewer System (MS4) Permit from the San Diego Regional Water Quality Control Board and a Storm Water Pollution Prevention Plan, which includes best management practices (BMPs) to reduce or eliminate pollutants in stormwater discharges. Lastly, the CERC building would be equipped with cool/green roofs and low-flow appliances. Therefore, the proposed project would be consistent with this CAP strategy. **Consistent.** To be consistent with the City's Municipal Code Section 143.1415(a), Resilient Infrastructure and Healthy Ecosystem Regulations, the project would be required to plant two trees for every 5,000 square feet of lot area. The proposed project

Table 5 Project Consistency with the City of San Diego 2022 CAP

Applicable 2022 CAP Strategies	Consistency with 2022 CAP Strategies
	would disturb 5.54 acres (241,136 square feet) of the 9.9-acre project site. However, 0.42 acres (18,395 square feet) are for the building footprint and patio, 0.22 acres (9,495 square feet) are for the basketball courts, 0.17 acres (7,194 square feet) are for the pickleball courts, and 1.60 acres (69,500 square feet) are for the soccer field, which are building and recreational areas that cannot be planted with trees. Excluding these areas, the proposed project would be required to plant 55 trees (136,552 square feet / 5,000 x 2 trees). The landscaping plans currently show approximately 68 tree plantings and therefore, the proposed project would be consistent with this CAP Strategy.
Strategy 6: Emerging Climate Actions	**Not Applicable.** The City is the responsible party for this CAP Strategy and this CAP Strategy would not be applicable to the proposed project.

Source: San Diego 2022b.
Notes:
[1] Includes a consistency with the City of San Deigo Municipal Code, Division 14, Climate Action Plan Consistency Regulations, for Mobility and Land Use Regulations and Resilient Infrastructure and Healthy Ecosystems Regulations.

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

No Impact. Applicable plans adopted for the purpose of reducing GHG emissions include the City's CAP, CARB's Scoping Plan, and SANDAG's San Diego Forward: The Regional Plan. A consistency analysis of the proposed project with the City's CAP is presented in Table 5 and included in Appendix A. A consistency analysis with CARB's Scoping Plan and SANDAG's The Regional Plan is presented below.

CARB 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 (CARB 2022). 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 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's GHG emissions would be further reduced with compliance with statewide measures that have been adopted since AB 32, SB 32, and AB 1279 were adopted. Therefore, the proposed project would not obstruct implementation of the 2022 Scoping Plan, and no impacts would occur.

SANDAG's San Diego Forward: The Regional Plan

The California legislature passed Senate Bill 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 San Diego Forward: The 2021 Regional Plan (2021 Regional Plan) in December 2021, which includes the region's SCS along with the Regional Transportation Plan (RTP) and Regional Comprehensive Plan (RCP). Currently, SANDAG is developing the Draft 2025 RTP with expected public feedback in spring 2025 (SANDAG 2025).

The SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency for governments and developers. The proposed project would provide recreational facilities and educational/community services for community use. As described in Section 3.11, *Land Use and Planning*, the proposed project would be consistent with the existing land use designation of Institutional and Public and Semi-Public Facilities. 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, no impact would occur.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
9. 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	

3. Environmental Analysis

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

Would the project:

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

Less Than Significant Impact. Project construction would require small amounts of hazardous materials, including fuels, greases, and other lubricants, and coatings such as paint. The handling, use, transport, and disposal of hazardous materials by the construction phase of the project would comply with existing regulations of several agencies—the US Environmental Protection Agency (EPA), Occupational Safety and Health Administration, California Division of Occupational Safety and Health, and the US Department of Transportation. The proposed project would operate as a CERC with recreational facilities. Project maintenance may require the use of cleaners, solvents, pesticides, and other custodial products that are potentially hazardous. These materials would be used in relatively small quantities, clearly labeled, and stored in compliance with State and federal requirements. With the exercise of normal safety practices, the proposed project would not create substantial hazards to the public or the environment. Therefore, impacts with respect to the transport, use, and disposal of hazardous materials 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. Construction projects typically maintain supplies onsite for containing and cleaning small spills of hazardous materials. However, construction activities would not involve a significant amount of hazardous materials, and their use would be temporary. Furthermore, project construction workers would be trained on the proper use, storage, and disposal of hazardous materials. The proposed project would operate as a CERC with recreational facilities and would not warrant use of hazardous materials in quantities that could result in hazardous conditions.

The proposed project would be constructed in accordance with the Storm Water Pollution Prevention Plan, which includes BMPs to reduce or eliminate pollutants in stormwater discharges. BMPs for hazardous materials may include off-site refueling, placement of generators on impervious surfaces, establishing cleanout areas for cement, etc. While the risk of exposure to hazardous materials cannot be eliminated, adherence to existing regulations would ensure compliance with safety standards related to the use and storage of hazardous materials and with the safety procedures mandated by applicable federal, State, and local laws and regulations. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The project site is within 0.25 mile of the San Ysidro Adult School and San Ysidro Middle School, which are both north of the project site. While the proposed project would use hazardous materials during construction (e.g., fuel) and operation (e.g., cleaning supplies), these hazardous materials would be used, transported, and stored in compliance with applicable local, State, and federal regulations. 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. The project site is not listed on EnviroStor or GeoTracker (DTSC 2024; SWRCB 2024). Therefore, impacts would be less than significant.

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

No Impact. The project site is not in an area with an adopted airport land use plan or within two miles of a public use airport; the project site is approximately 3 miles west of the Brown Field Municipal Airport and 4 miles east of the Imperial Beach Airport (AirNav 2024). The Tijuana International Airport is approximately 2.6 miles southeast of the project site. Therefore, no impacts would occur.

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

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

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

Less Than Significant Impact. The project site is not in a very high fire hazard severity zone (VHFHSZ) (CAL FIRE 2024). The project site is in an urbanized portion of the City. The proposed project would be required to comply with the most recent versions of the CBC and California Fire Code (CFC). Therefore, impacts would be less than significant.

3.10 HYDROLOGY AND WATER QUALITY

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

Would the project:

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

Less Than Significant Impact. The project site is within the jurisdiction of the San Diego Regional Water Quality Control Board. Drainage and surface water discharges during construction and operation of the

proposed project would not violate any water quality standards or waste discharge requirements. However, site preparation and other soil-disturbing activities during construction of the project could temporarily increase the amount of soil erosion and siltation entering the local stormwater drainage system.

The proposed project would disturb approximately up to 9.9 acres. Pursuant to Section 402 of the Clean Water Act, the EPA has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct stormwater discharges. In California, the State Water Resources Control Board administers the NPDES permitting program and is responsible for developing permitting requirements. The NPDES program regulates industrial pollutant discharges, including construction activities for sites larger than one acre. Since implementation of the proposed project would disturb more than one acre, the proposed project would be subject to the NPDES Construction General Permit requirements (Order No. 2009-0009-DWQ).

Additionally, Division 3, Stormwater Management and Discharge Control, of the San Diego Municipal Code is intended to restore and maintain the water quality of receiving waters by prohibiting non-stormwater discharges into the Municipal Separate Storm Sewer System (MS4). The proposed project would comply with the City's Municipal Code, which would ensure impacts to the MS4 are reduced.

Construction

Clearing, grading, excavation, and construction activities associated with the project have the potential to impact water quality through soil erosion and increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials such as fuels, solvents, and paints may present a risk to surface water quality. To minimize these potential impacts, the proposed project would be required to comply with the NPDES Construction General Permit as well as BMPs to control erosion and prevent any discharge of sediments from the site to reduce potential impacts to less than significant levels.

Operation

For site operations, structural BMPs, including landscaping (e.g., ground cover on slopes and exposed surfaces, as indicated in the Geotechnical Report), would reduce runoff. Therefore, a less than significant impact to water quality standards would occur. The proposed project would also be required to comply with applicable federal, State, and local regulations. Provided that the standard BMPs are implemented, the proposed project would not substantially degrade water quality. A less than significant impact would occur.

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

Less Than Significant Impact. While the proposed project would result in an increase in impervious surfaces compared to existing conditions, the proposed project does not propose groundwater wells that would extract groundwater from an aquifer, nor would the proposed project affect recharge capabilities for the basin. The project site is within the Coastal Plain of San Diego subbasin of the San Diego Basin (DWR 2025). The San Diego Basin Plan includes groundwater management programs that aim to enhance water quality and protect beneficial uses by periodically monitoring and assessing groundwater levels and quality (RWQCB 2021). As the proposed project would not substantially decrease groundwater supplies, would include landscaping throughout

the site, and would not conflict with the goals of the San Diego Basin Plan, a less than significant impact would occur.

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

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

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

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

Less Than Significant Impact With Mitigation Incorporated. The proposed project would not alter the course of a stream. The proposed project would include pervious and impervious surfaces on-site. The use of BMPs and compliance with local, state, and federal regulations would ensure that drainage patterns and stormwater runoff are maintained. The Geotechnical report indicated that surface drainage on the site should be provided so that water is not permitted to pond adjacent to footings or pavements and that a gradient of 2 percent or steeper should be maintained away from structures. The proposed project would implement Mitigation Measure GEO-1, which would ensure that the recommendations of the Geotechnical Report pertaining to drainage are implemented. Therefore, impacts would be less than significant with mitigation incorporated.

Mitigation Measures

Implement Mitigation Measure GEO-1.

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

Less Than Significant Impact. Project implementation would include pervious and impervious surfaces on-site. With the proposed BMPs, impacts associated with the impervious surfaces would be reduced. The proposed project would be required to comply with local, State, and federal regulations pertaining to stormwater. There are no active storm drain systems within the project site or along East Beyer Boulevard, adjacent to the project site. The proposed project would require surface drainage infrastructure as well as storm drain inlet structures and below-grade utility lines to capture and convey stormwater runoff. The onsite storm drain system would be designed to facilitate the general north-to-south drainage patterns; the proposed project would require permanent post-construction BMP facilities to meet the water quality and hydrology requirements per San Ysidro School District and City of San Diego design standards. The proposed onsite drainage would be designed to discharge to these BMP facilities, which would be sized

adequately to accommodate runoff generated by the proposed project. Therefore, impacts would be less than significant.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The project site is within Zone X, Area of Minimal Flood Hazard (Flood Insurance Rate Map ID #06073C2166G) (FEMA 2012). Since the likelihood of floods in the project area is low, the proposed project would have a less than significant impact on impeding or redirecting flood flows.

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

Less Than Significant Impact. A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. Although there are no large water tanks in the area that could impact the proposed project site, there are dams in the region that could create flooding impacts.

Based on maps from the Office of Emergency Services, the site is not within a dam inundation zone for the Savage Dam (DSOD 2024). Savage Dam is located approximately 7.5 miles northeast of the project site. Given the distance and varying topography, impacts of seiche affecting the project site are less than significant.

A tsunami is earthquake-induced flooding that is created from a large displacement of the ocean floor. The site is approximately 5.2 miles east of the Pacific Ocean and is not in a Tsunami Hazard area (CDC 2024c); therefore, the likelihood of a tsunami impacting the project site is low. No impacts would occur.

A mudflow is a landslide event in which debris, land mass, and soils are saturated during their displacement. The project site is not susceptible to landslides based on the site reconnaissance, which did not identify deep-seated slope instability, and therefore, mudflows are unlikely to occur. Impacts would be less than significant.

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

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

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

3.11 LAND USE AND PLANNING

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
11. 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	

Would the project:

a) Physically divide an established community?

No Impact. The project site is surrounded by residential uses to the north and west, the future Beyer Park to the east, and vacant land to the south. The proposed project would occur within the boundaries of the project site and would not divide an established community. Therefore, no impacts would occur.

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

Less Than Significant Impact. The project site is currently zoned RS-1-7, and the existing land use designation is Institutional and Public and Semi-Public Facilities. Under the RS 1-7 zone, educational facilities are conditionally permitted. Implementation of the proposed project would not change the zoning or land use designations of the site. Therefore, impacts would be less than significant

3.12 MINERAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
12. 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

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?

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

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

The project site is in MRZ-3, where the known or inferred occurrences of undetermined mineral resource significance exists (San Diego 2024a). The project site and its surroundings areas are not developed for mineral extractions. The project site was formerly developed, and the proposed project would occur within the footprint of the project site. No impact would occur.

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

No Impact. According to the City of San Diego Conservation Element, the project site does not overlie any significant mineral deposits, as shown in Figure CE-6, Generalized Mineral Land Classification (San Diego 2024a). Furthermore, the project site, which was formerly developed with the Beyer Elementary School, is currently vacant and no mining activities occur onsite. Therefore, the proposed project would not result in a loss of availability of a mining site, and no impact would occur.

3.13 NOISE

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
13. 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	

3. Environmental Analysis

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

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

- *Noise Monitoring Report*, PlaceWorks, January 23, 2025

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

Environmental Setting

Noise is defined as unwanted sound. It 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, the federal government, State of California, and City of San Diego (including the San Ysidro Community Plan) have established criteria to protect public health and safety and to prevent disruption of certain human activities. Additional information on noise and vibration fundamentals and applicable regulations are contained in Appendix D.

Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. The San Ysidro Community Plan considers residences, schools, lodging, libraries, religious facilities, nursing homes, playgrounds, and parks as noise-sensitive uses. The nearest sensitive receptors to the project site are single-family residential uses approximately 120 feet to the north of the proposed CERC building and multifamily residential uses approximately 95 feet to the east of the proposed CERC building. There are also noise-sensitive single-family residential uses approximately 545 feet to the south of the proposed soccer field, south of the San Diego Metropolitan Transit System (MTS) trolley line.

Existing Conditions

The project site is approximately 440 feet east of I-805 centerline and 210 feet north of the MTS trolley line to the nearest project site boundary line in a predominantly residential neighborhood. The existing noise environment is characterized primarily by residential traffic noise along East Beyer Boulevard. Distant rail noise is also audible on the project site. Noise from typical residential activities, birds, and wind noise also contribute to the existing ambient noise environment.

To determine baseline noise levels in the project vicinity, ambient noise monitoring was conducted by PlaceWorks on Thursday, December 12, 2024. Three short-term (15-minute) measurement locations were selected and conducted around the project site. 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. 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 7, *Approximate Noise Monitoring Locations*, and results are summarized in Table 6, *Short-Term Noise Measurements Summary in A-Weighted Sound Levels*.

Table 6 Short-Term Noise Measurements Summary in A-Weighted Sound Levels

Monitoring Location	Description	15-Minute Noise Level, dBA						
		L_{eq}	L_{max}	L_{min}	L50	L25	L8	L2
ST-1	2317-2319 E. Beyer Boulevard 12/12/24, 1:22 PM	65.2	78.5	48.7	57.2	65.1	70.7	73.8
ST-2	2395 E. Beyer Boulevard 12/12/24, 1:38 PM	66.0	77.2	52.4	60.8	67.0	71.1	73.7
ST-3	Corner of Filoi Avenue and Enchanted Place 12/12/24, 12:48 PM	59.8	72.7	55.4	59.2	60.3	61.6	63.4

Source: Appendix D.

- **Short-Term Location 1 (ST-1)** was conducted adjacent to the multifamily apartments at 2317 to 2319 East Beyer Boulevard near the complex access driveway. The measurement was conducted approximately 70 feet west of the project site boundary line. A 15-minute noise measurement began at 1:22 pm. The noise environment is characterized by traffic noise on East Beyer Boulevard. Noise levels measured 56.2 dBA L_{eq} and 78.5 dBA L_{max} during the measurement period at ST-1.

- **Short-Term Location 2 (ST-2)** was conducted adjacent to the multifamily apartments at 2395 East Beyer Boulevard near the complex access driveway. The measurement was conducted approximately 65 feet west of the project site boundary line. A 15-minute noise measurement began at 1:38 pm. The noise environment is characterized primarily by residential traffic on East Beyer Boulevard and passenger rail activity to the south. Noise levels measured 66.0 dBA L_{eq} and 77.2 dBA L_{max} during the measurement period at ST-2.

- **Short-Term Location 3 (ST-3)** was conducted on at the corner of Filoi Avenue and Enchanted Place directly north of the project site and south of single-family receptors. The measurement was conducted approximately 5 feet north of the project site boundary line. A 15-minute noise measurement began at 12:48 pm. The noise environment is characterized by traffic noise on East Beyer Boulevard. Noise levels measured 59.8 dBA L_{eq} and 72.7 dBA L_{max} during the measurement period at ST-3.

3. Environmental Analysis

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?

Less Than Significant Impact.

Construction Noise

Per San Diego Municipal Code Section 59.5.0404, Construction Noise, and the City's CEQA Guidelines, construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75 dB during the 12-hour period from 7:00 am to 7:00 pm. Further, construction activity is prohibited between the hours of 7:00 pm of any day, and 7:00 am of the following day, or on legal holidays per San Diego Municipal Code Section 59.5.0404 and the City's CEQA Guidelines.

Noise generated by on-site 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 phase of construction involves different types of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest three pieces of 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 phase is determined by combining the Leq contributions from the top-three loudest pieces of equipment used at a given time, while accounting for the ongoing time-variations of noise emissions (commonly referred to as the usage factor). Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on what specific activity is being 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 6 dBA per doubling of distance (conservatively disregarding other attenuation effects from air absorption, ground effects, and shielding effects provided by intervening structures or existing solid walls), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site (site of each development phase) with different equipment mixes, loads, and power requirements.

The proposed project would construct a community resource center on vacant land that would include the construction of offices, conference rooms, family services, kitchen, restrooms, and additional spaces within a 17,100-square-foot building. An outdoor event space would also be constructed, with capacity for up to 200 people attending community gatherings, rallies, and similar large-scale assemblies. The proposed project would also construct two basketball courts, four pickleball courts, and a soccer field. There would be no sport lighting, scoreboards, public address (PA) systems, bleachers, amplified music, or exterior mechanical equipment.

Figure 7 - Approximate Noise Monitoring Locations

Project Location

ST-X Short-Term Noise Measurement Locations (3)

0 170
Scale (Feet)

Source: Nearmap 2024.

3. Environmental Analysis

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The expected construction equipment mix was estimated and categorized by construction activity using the Federal Highway Administration Roadway Construction Noise Model (RCNM). Average noise levels from project-related construction activities are calculated by modeling the three loudest pieces of equipment per activity phase. Equipment for grading and site preparation 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. Similarly, construction noise from asphalt demolition is modeled from the center of the project site. Building construction and architectural coating are measured from the edge of the proposed buildings to the nearest sensitive receptors. Paving is also measured from the edge of the nearest paving areas to the nearest sensitive receptors. Results are summarized in Table 7, *Project Related Construction Noise Levels (dBA)*, at the nearest receptors. Modeled construction noise levels at existing multifamily residences to the west would range between 68 dBA and 73 dBA Leq, between 66 dBA and 71 dBA Leq at single-family residences to the north, and between 50 dBA and 63 dBA Leq at single-family residences to the south of the project site. Construction noise levels would not exceed the City's threshold of 75 dBA Leq at noise-sensitive uses near the project site. Therefore, construction noise impacts would be less than significant.

Table 7 Project-Related Construction Noise Levels

Construction Activity Phase	Noise Levels in dBA L_{eq}			
	RCNM Reference Noise Level	Receptor to West	Receptor to North	Receptor to South
Distance in feet	**50**	**195**	**260**	**650**
Asphalt Demolition	85	73	71	63
Site Prep	81	69	67	59
Grading	84	72	70	62
Utility Trenching	82	70	68	60
Distance in feet	**50**	**115**	**140**	**900**
Building Construction	80	73	71	55
Architectural Coating	75	68	66	50
Distance in feet	**50**	**100**	**250**	**660**
Paving	79	73	65	57
Distance in feet	**50**	**175**	**190**	**560**
Finish/Landscaping	79	68	67	58
Exceeds City's 75 dBA L_{eq} Threshold?	**No**	**No**	**No**	**No**

Source: FHWA's RCNM software.
Notes: Distance measurements were taken using Google Earth (2024).
dBA L_{eq} = Energy-Average (L_{eq}) Sound Levels.
See Appendix D for calculations.

Operational Noise

The proposed project's primary onsite operational noise sources would include heating ventilation and cooling (HVAC) equipment, outdoor events, and noise from the sports facilities (pickleball courts, basketball courts, and soccer field). The proposed project would include 93 parking spaces south of the proposed CERC building

and east of existing multi-family residential uses. Implementation of the proposed project would increase existing traffic volumes with the addition of 317 daily project trips during peak day activities. Operational noise evaluated for the proposed project activities would include HVAC, outdoor event area, pickleball courts,[5] parking lot, and traffic noise.

San Diego Municipal Code Section 59.5.0401, Sound Level Limits, limits stationary source noise levels measured at or beyond the property lines of any property zoned residential due to a project. Noise level limits for single-family residences shall not exceed an average sound level of 50 dBA between 7:00 am to 7:00 pm, 45 dBA between 7:00 pm to 10:00 pm, and 40 dBA between 10:00 pm to 7:00 am. Noise level limits for multifamily residences shall not exceed an average sound level of 55 dBA between 7:00 am and 7:00 pm, 50 dBA between 7:00 pm and 10:00 pm, and 45 dBA between 10:00 pm and 7:00 am.

In addition, a project will normally have a significant effect on the environment related to noise if it substantially increases the ambient noise levels for adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an outdoor environment. Noise levels up to 65 dBA CNEL are normally acceptable, and levels above 70 dBA CNEL are normally unacceptable at sensitive receptor locations such as residences. Noise environments in these areas would be considered degraded. Based on this, a significant impact would occur if the following traffic noise increases occur relative to the existing noise environment:

- For project-related traffic noise, the proposed project causes the ambient noise levels measured at the property line of affected uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories; or

- The proposed project causes the ambient noise levels measured at the property line of affected uses to increase by 5 dBA CNEL or more within the "normally acceptable" or "conditionally acceptable" categories.

HVAC

Assuming a cooling capacity of 1.2 tons per 1,000 square feet of building space, the proposed 17,100-square-foot CERC building would require approximately 20 tons of cooling capacity, or four 5-ton rooftop HVAC units. Rooftop HVAC units would generate noise levels of up to 74 dBA (York 2006). The four CERC building HVAC units operating continuously would result in a combined HVAC noise level of 43 dBA Leq at the nearest single-family noise sensitive receptor (residence to the north at 140 to 150 feet from assumed HVAC cluster units) and a combined HVAC noise level of 40 dBA Leq at the nearest multifamily noise-sensitive receptor (apartments to the west at 170 to 260 feet from assumed HVAC cluster units). Based on the measured existing noise levels shown in Table 6, ambient noise levels would result in an increase of up to 0.1 dBA due to the addition of project HVAC units to the existing noise environment.

[5] For the purposes of this analysis, only noise from the pickleball courts was analyzed because pickleball would generate the loudest noise compared to the activities from the tennis courts, basketball courts, and soccer field. Noise from the basketball, tennis, and soccer activities would not logarithmically add to the noise level when combined with pickleball noise.

The proposed project includes a four-foot rooftop parapet that would break line of sight from source to receiver and reduce HVAC noise levels at nearby receptors by 3 dBA. The resulting project HVAC noise levels at the nearest single-family receptor would be 40 dBA Leq and 37 dBA Leq at the nearest multifamily receptor. Per San Diego Municipal Code Section 59.5.0401, operational noise from the HVAC equipment would not exceed daytime, evening, or nighttime noise standards of 50 dBA, 45 dBA, and 40 dBA Leq, respectively, at single-family receptors. In addition, project HVAC equipment would not exceed daytime, evening, or nighttime noise standards of 55 dBA, 50 dBA, and 45 dBA Leq, respectively, at multifamily receptors. Furthermore, operational noise from HVAC equipment would not substantially increase ambient noise levels at nearby residences. Thus, noise impacts from mechanical equipment would be less than significant.

Outdoor Event Area

The proposed project would include an outdoor event area. The proposed project is anticipated to host events that could accommodate up to 200 people. To evaluate outdoor event area noise, this analysis assumes a noise level of 63 dBA Leq at 50 feet of 20 people talking simultaneously, or 72 dBA Leq for 200 people talking simultaneously (Pearsons 1977). This noise level would attenuate to 60 dBA Leq at 200 feet and 55 dBA Leq at 350 feet. The acoustical center of the proposed outdoor event area would be approximately 350 feet from the nearest multifamily residential uses to the west of the project site and approximately 200 feet from the nearest single-family residential uses to the north. Residential uses to the west and north would not have direct line of sight to the outdoor event area due to shielding provided by intervening topography and the proposed CERC building. Accounting for an approximately 10 dBA reduction in outdoor event noise levels due to shielding, the resulting outdoor event area noise level would be 50 dBA Leq at the single-family uses to the north and 45 dBA Leq at the multifamily uses to the west. Based on the measured existing noise levels shown in Table 6, ambient noise levels would result in an increase of up to 0.4 dBA due to the addition of project outdoor events to the existing noise environment. Per San Diego Municipal Code Section 59.5.0401, operational noise from the outdoor event area would not exceed daytime noise standards of 50 dBA and 55 dBA Leq at single- and multifamily receptors, respectively. Furthermore, project outdoor event noise would not substantially increase ambient noise levels at nearby residences. Thus, noise impacts from daytime outdoor area events would be less than significant.

Pickleball Courts

The four proposed pickleball courts would be constructed on the northeastern portion of the project site, south of the proposed outdoor event area. Pickleball noise consists of ball hits, when the ball contacts the paddle and the ground, and voice communication between players.[6] Noise produced when the ball contacts the paddle may be described as instantaneous and brief with rapid decay, or impulsive noise with a duration of less than two milliseconds. Pickleball noise predominantly travels in the direction of play versus the sides of the court. Effective ways to reduce pickleball noise at sensitive receptors are to increase the distance from pickleball courts to receptors, orientation of pickleball courts, barriers, earthen berms, and requiring the use of quieter paddles and balls.

[6] For the purposes of this analysis, only noise from the pickleball courts was analyzed because pickleball noise would generate the loudest noise compared to the activities from the tennis courts, basketball courts, and soccer field. Noise from the basketball, tennis, and soccer activities would not logarithmically add to the noise level when combined with pickleball noise.

3. Environmental Analysis

Instantaneous pickleball noise levels have been measured to range between 70 dBA and 75 dBA Lmax during a single ball strike with the paddle. Measurements of pickleball noise have resulted in noise levels ranging between 55 dBA Leq and 59 dBA Leq at 50 feet from the perimeter of the court, depending on the number of active courts. For this analysis, a noise level of 63 dBA Leq has been applied to project pickleball noise to account for all proposed courts being active for an hour (BAP 2023). Accounting for distances from the proposed pickleball courts and noise reductions due to intervening topography, noise levels would be 45 dBA Leq at a distance of 300 feet to the single-family residential receptor to the north, and 46 dBA Leq at a distance of 350 feet to the multifamily residential receptors to the west of proposed pickleball courts. Based on the measured existing noise levels shown in Table 6, ambient noise levels would result in an increase of up to 0.4 dBA due to the addition of the pickleball courts to the existing noise environment.

Per San Diego Municipal Code Section 59.5.0401, pickleball noise would not exceed daytime and evening noise standards of 50 dBA and 45 dBA Leq, respectively, at single-family receptors. In addition, project pickleball noise would not exceed daytime and evening noise standards of 55 dBA and 50 dBA Leq, respectively, at multifamily receptors. Furthermore, the proposed project's pickleball noise would not substantially increase ambient noise levels at nearby residences. Thus, noise impacts from the pickleball courts would be less than significant.

Parking Lot Noise

The proposed project would accommodate 93 new parking spaces in the northwestern portion of the project site. Parking lot noise would consist of vehicles idling and maneuvering, doors opening and closing, and voices in the parking lot areas and driveways. Based upon previous noise measurements conducted, the single event noise level (SEL) associated with a parking event is typically 71 dBA SEL at 50 feet. When quantifying the associated noise level for the project parking stalls adjacent to the existing nearby multifamily residential uses, a conservative approach to the number of parking events to occur within a peak hour was taken. Assuming that each parking stall were to fill and empty (186 parking events total) during the peak hour, the noise level is predicted to be 58 dBA Leq at 50 feet from the center of the parking stalls. The nearest single-family residential property line is approximately 300 feet from the center of the proposed parking lot, resulting in a noise level of 43 dBA Leq. The nearest multifamily residential property line is approximately 150 feet from the center of the proposed parking lot, resulting in a noise level of 49 dBA Leq. Based on the measured existing noise levels shown in Table 6, ambient noise levels would result in an increase of up to 0.1 dBA due to the addition of project parking lot to the existing noise environment.

Per San Diego Municipal Code Section 59.5.0401, parking lot noise would not exceed daytime and evening noise standards of 50 dBA and 45 dBA Leq, respectively, at single-family receptors. In addition, project parking lot noise would not exceed daytime and evening noise standards of 55 dBA and 50 dBA Leq, respectively, at multifamily receptors. Furthermore, project parking lot noise would not substantially increase ambient noise levels at nearby residences. Thus, noise impacts from the parking lot would be less than significant.

Traffic Noise

Roadway segment average daily traffic (ADT) volumes were provided by Garland Associates (see Appendix E). To determine the project-related traffic noise increase, the Existing and Future with Project ADT volumes were

compared to the Existing and Future No Project ADT volumes, as shown in Table 8, *Summary of Traffic Noise Increases*. As a result of the increase of 317 daily project trips (during peak activity), the minimal increase in ADT volumes on study roadway segments would increase existing traffic noise levels by up to 1 dBA. An increase of up to 1 dBA, as shown in Table 8, would not exceed the 3 dBA increase threshold. Therefore, the proposed project would not result in substantial traffic noise level increases, and noise impacts from project traffic would be less than significant.

Table 8 Summary of Traffic Noise Increases

	Segment		Average Daily Traffic Noise Levels, dBA Ldn				dBA Ldn	
Roadway	From	To	Existing No Project	Existing with Project	Future No Project	Future with Project	Existing Noise Increase	Future Noise Increase
E. Beyer Blvd	the North	Project Site	62	62	62	63	<1	1
E. Beyer Blvd	Project Site	the South	60	60	60	60	<1	<1
Otay Mesa Road	Beyer Blvd	the North	61	61	61	61	<1	<1
Beyer Blvd	the West	E Beyer Blvd/Otay Mesa Road	63	63	63	63	<1	<1
Beyer Blvd	E Beyer Blvd/Otay Mesa Road	the East	51	51	51	51	<1	<1

Source: Appendix D and Appendix E.

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

Less Than Significant Impact. The Federal Transit Administration (FTA) vibration limits vibration level to a peak particle velocity (PPV) of 0.20 in/sec for nonengineered timber and masonry buildings (which would apply to the off-site surrounding residential structures). A vibration impact would be considered significant if construction activities or operational activities generate vibration levels exceeding 0.2 in/sec PPV at adjacent residential uses.

Construction Vibration

Potential vibration impacts associated with development projects are usually related to the use of heavy construction equipment during the asphalt demolition phase of construction. Construction can generate varying degrees of ground vibration depending on the construction procedures and equipment. Construction equipment generates vibration that spreads through the ground and diminishes 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 structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

Table 9, *Vibration Impact Levels for Typical Construction Equipment*, summarizes vibration levels for typical construction equipment at a reference distance of 25 feet. Typical construction equipment can generate

vibration levels ranging up to 0.21 inches per second (in/sec) PPV at 25 feet. Vibration levels at a distance greater than 100 feet would attenuate to 0.02 in/sec PPV or less.

Table 9 Vibration Impact Levels for Typical Construction Equipment

Equipment	in/sec PPV			
	Reference Levels at 25 Feet	Residential receptors to West at 75 feet[1]	Residential receptors to North at 130 feet[1]	Residential receptors to South at 252 feet[1]
Vibratory Roller	0.21	0.040	0.018	0.002
Clam shovel	0.202	0.039	0.017	0.002
Hoe Ram	0.089	0.017	0.008	0.001
Large Bulldozer	0.089	0.017	0.008	0.001
Caisson Drilling	0.089	0.017	0.008	0.001
Loaded Trucks	0.076	0.015	0.006	0.001
Jackhammer	0.035	0.007	0.003	0.000
Small Bulldozer	0.003	0.001	0.000	0.000

Source: FTA 2018. See Appendix D for calculations
[1] As measured from the edge of construction site using Google Earth Pro.

The nearest structure to the site's construction activities, the multiresidential uses to the west, are approximately 75 feet away from the nearest construction area. At this distance, construction vibration from a vibratory roller would attenuate to 0.04 in/sec PPV or less. Proposed construction activities would not exceed the FTA vibration standard of 0.2 in/sec PPV at nearby off-site structures. Therefore, impacts from construction vibration would be less than significant.

Operational Vibration

Project operations would not include the use of any stationary equipment that would result in excessive vibration levels. The proposed project would not accommodate heavy-duty trucks or equipment. Therefore, the proposed project would result in negligible groundborne-vibration during operations, and no impact would occur.

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

No Impact. The project site is approximately 3 miles west of the Brown Field Municipal Airport and approximately 4 miles east of the Imperial Beach Airport. The Tijuana International Airport is approximately 2.6 miles southeast of the project site. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels, and no impact would occur.

3.14 POPULATION AND HOUSING

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
14. 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

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)?

Less than Significant Impact. The proposed project would have up to 35 employees on a typical day. The proposed project employment generation is not expected to result in a significant relocation of employees as the region has an unemployment rate 4.3 percent (BLS 2024). Therefore, the proposed project would not directly nor indirectly induce substantial unplanned growth in the City's population. Impacts would be less than significant.

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

No Impact. Project construction would occur within the boundaries of the project site. No housing or people would be displaced. No impact would occur.

3.15 PUBLIC SERVICES

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

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?

Less than Significant. The City of San Diego Fire-Rescue Department (SDFD) would serve the project site; The closest fire station to the project site is Fire Station 29, at 198 West San Ysidro Boulevard in the City of San Diego, approximately 0.4 mile southwest of the project site. The proposed project would serve the existing community, and the new employment generated by the proposed project would come from the existing regional labor pool. Both the City Fire Marshal and DSA would be required to approve fire access around the site. Therefore, project implementation would not substantially affect the SDFD's response times or require expansion of fire protection services such that new or physically altered fire stations would be required. Impacts would be less than significant.

b) Police protection?

Less Than Significant Impact. Law enforcement and police protection services are provided by the San Diego Police Department at 1120 27th Street in the City of San Diego, approximately 2.6 miles northwest of the site. The proposed project would serve the existing community, and the new employment generated by the proposed project would come from the existing regional labor pool. Therefore, project implementation would not warrant additional law enforcement facilities. Impacts to police protection services would be less than significant.

c) Schools?

No Impact. Typically, residential uses generate a need for school services. The proposed project is a community-serving use that would include community resources and educational services, and therefore, would not generate new students. Therefore, the proposed project would not impact schools; no impact would occur.

d) Parks?

Less Than Significant Impact. Residential uses typically generate a need for recreational facilities. The proposed project is a community-serving use that would construct new recreational facilities (basketball, pickleball, tennis courts; and a soccer field) available for community use. Therefore, impacts would be less than significant.

e) Other public facilities?

No Impact. The need for public services and facilities (e.g. libraries, hospitals, childcare, teen or senior centers) is typically caused by residential uses. As the proposed project would provide community and recreational uses, it would not generate additional residents thereby requiring the need for new or expanded public facilities. Therefore, no impacts would occur.

3.16 RECREATION

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

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

Less Than Significant Impact. As indicated in Impact 3.15(d), the proposed project would not generate an additional need for recreational uses but would construct recreational uses for community-use. As such, the proposed project would not increase the use of existing parks or recreational facilities. Therefore, impacts would be less than significant.

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. As indicated in Impact 3.16(a), the proposed project would not require construction of offsite recreational facilities. The proposed project includes the construction of recreational facilities on the project site. The environmental effects related to the whole project, including the recreational facilities, are discussed throughout this Initial Study. Impacts would be less than significant.

3.17 TRANSPORTATION

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
17. 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

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

- *Transportation Impact Analysis for the Proposed Beyer Community Resource Center*, Garland Associates, January 2025

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

Would the project:

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 Mobility Element of the City of San Diego General Plan states that its overall purpose is to improve mobility through the development and operation of a balanced, well-connected, safe, sustainable, and equitable multimodal transportation system for people to safely, conveniently, and enjoyably move around. The Mobility Element also includes specific goals and policies for each mobility category. The categories in the Mobility Element that are applicable to the proposed project include walkable communities, bicycling, shared use mobility, transit, complete streets, and parking/curb use management.

While the proposed project would increase the number of users visiting the site, compared to existing conditions, the proposed project is consistent with the goals and policies in the Mobility Element and would not adversely affect the performance of any roadway, transit, or non-motorized (pedestrian and bicycle)

transportation facilities. Based on the Transportation Impact Analysis, the discussion of non-motorized transportation and transit, and a review of the Mobility Element of the City's General Plan, 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 project site would be accessed via two existing driveways along Beyer Boulevard. Therefore, impacts would be less than significant.

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

Less Than Significant 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 eliminated 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 current CEQA Guidelines, the 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)). 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 Guidelines, metrics related to "vehicle miles traveled" (VMT) were required beginning July 1, 2020, to evaluate the significance of transportation impacts under CEQA for development projects, land use plans, and transportation infrastructure projects. State courts ruled 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.

According to the Transportation Impact Analysis, the proposed project would generate an estimated 132 vehicle trips per day on an average day of activity and 317 trips per day on a peak day of activity. The City of San Diego's "Transportation Study Manual" includes screening criteria that can be used to identify when a proposed land development project is anticipated to result in a less than significant VMT impact. The document states that a project is presumed to have a less than significant impact on VMT if the project is a locally serving public facility. As the proposed project is a public school district-owned facility providing community resources, it is in the locally serving public facility category. The City's Transportation Study Manual indicates that land uses in the locally serving public facility category can be screened from requiring a detailed VMT analysis. Based on these guidelines, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The proposed project would not provide any on- or off-site access or circulation features that would create or increase any design hazards or incompatible uses. Access to the project site would be provided by the two existing driveways along the western boundary of the project site on East Beyer Boulevard. All circulation improvements within the project site would be consistent with the criteria of the DSA.

The increased levels of traffic, pedestrians, and vehicular turning movements that would occur at the driveways and at the nearby intersections would result in an increased number of traffic conflicts and a corresponding increase in the probability of an accident occurring. These impacts would not be significant, however, because the streets, intersections, and driveways are designed to accommodate the anticipated levels of vehicular and pedestrian activity. These streets and intersections have historically been accommodating school-related traffic on a daily basis for the former Beyer Elementary School, which was on the project site. The proposed project would be compatible with the design and operation of a school-related facility, and the proposed project would not result in any major modifications to the access features at the project site. As the existing street network could readily accommodate the anticipated increase in vehicular, pedestrian, and bicycle activity, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, impacts would be less than significant.

d) Result in inadequate emergency access?

No Impact. Emergency access to the project site would be provided by two existing driveways on the western boundary of the site along East Beyer Boulevard. The proposed access and circulation features at the project site, including the driveways, parking lots, on-site roadways, and fire lanes would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. The proposed project would be designed to accommodate emergency access to the CERC building, outdoor event space, and recreational facilities. The access and circulation features at the project site are subject to and must satisfy the District's design requirements and would be subject to approval by the City Fire Marshal and the DSA. Emergency vehicles could easily access the building and all other areas of the project site 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
18. 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	

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

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

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

No Impact. As indicated in Impact 5.4(a), the project site vacant and undeveloped, and there are no state or national historic resources onsite. Therefore, the proposed project would not impact historic resources; no impact would occur.

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

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 area. 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 resources; 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 provide comments.

The District has not been contacted per AB 52, and the consultation process has not been triggered. Implementation of the proposed project would require ground-disturbing activities such as ground clearing, excavation, grading, and other construction activities. Although the project site has been

previously disturbed with the past development of the Beyer Elementary School, potential buried resources could be unearthed during ground disturbing activities. Mitigation Measure CUL-1 requires that if any evidence of tribal cultural resources is discovered, the qualified archaeological monitor shall contact the most closely-related tribe to assess the significance of the find and provide recommendations on how to proceed**.** Therefore, impacts to tribal cultural resources would be reduced to a less than significant impact with mitigation.

Mitigation Measures

Implement Mitigation Measure CUL-1.

3.19 UTILITIES AND SERVICE SYSTEMS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
19. 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	

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?

Less than Significant Impact.

Water Treatment

The City of San Diego Public Utilities Department provides water service to the City including the project site (San Diego 2024b). The Public Utilities Department utilizes imported, surface, recycled, and groundwater supplies to ensure adequate water is available to meet the City's demands. The City owns and manages nine surface water reservoirs, three water treatment plants, and five groundwater basins (San Diego 2024b). These reservoirs provide approximately 10 percent of the City's total water supply. The proposed project would generate the demand for 5,347,828 gallons of water per year (16.41 acre-feet per year [AFY]) (Appendix A). According to the 2020 Urban Water Management Plan (UWMP), during normal and multiple-dry years, the City's water demand would not exceed its water supplies; the 2030 water demand and supply in 2030 would be 215,601 AFY (San Diego 2021). The proposed project would make up less than 1 percent of the City's 2030 water demand. Therefore, the proposed project would not generate substantial water demands requiring the construction or expansion of water treatment facilities. Therefore, impacts would be less than significant.

Wastewater Treatment

The City of San Diego Public Utilities Department is responsible for wastewater treatment in the City, including the project site. Wastewater from the project site would be treated at the South Bay Water Reclamation Plant which has a treatment capacity of 15 million gallons per day (San Diego 2021; San Diego 2025). The proposed project would generate approximately 3,039,247 gallons of wastewater generation per year (8,327 gallons per day). The proposed project would make up less than 1 percent of the South Bay Water Reclamation Plant's treatment capacity. Therefore, the proposed project would not generate substantial wastewater requiring the construction or expansion of wastewater treatment facilities. Therefore, impacts would be less than significant.

Stormwater Drainage

Stormwater drainage impacts are addressed in Impact 3.10(c.iii) in Section 3.10, *Hydrology and Water Quality*. The proposed project would include pervious and impervious surfaces, and the proposed project would implement BMPs and comply with all applicable regulations, which would ensure that impacts to stormwater drainages are minimized. The proposed project would require surface drainage infrastructure as well as storm drain inlet structures and below-grade utility lines to capture and convey stormwater runoff. The onsite storm drain system would be designed to facilitate the general north-to-south drainage patterns; the proposed project would require permanent post-construction BMP facilities. The proposed onsite drainage would be designed to discharge to these BMP facilities and sized adequately to accommodate runoff generated by the proposed project. With the construction of the storm drain structures and BMPs, the proposed project would minimize impacts to stormwater drainage in the area. Therefore, impacts would be less than significant.

Electricity and Natural Gas

SDG&E provides natural gas and electricity to the City, including the project site. The proposed project would require connection to these utilities; these utility connections would be constructed to meet SDG&E's requirements. As described in Section 5.6, *Energy*, while the proposed project would generate additional energy demands, it would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements. The proposed project would not generate substantial natural gas and electricity

demands that would require the construction or expansion of gas or electricity facilities to continue service provision. Therefore, impacts are less than significant.

Telecommunications

There are existing telecommunications facilities and services in the immediate area for the proposed project to connect. The proposed project would not generate a substantial demand for telecommunication services, such that the construction or expansion of telecommunication facilities would be warranted. Therefore, impacts would be less than significant.

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

Less than Significant Impact. As indicated in Impact 3.19(a), the proposed project would generate water demand of 16.41 AFY (Appendix A). According to the 2020 Urban Water Management Plan (UWMP), during normal and multiple-dry years, the City's water demand would not exceed its water supplies; the 2030 water demand and supply in 2030 would be 215,601 AFY for multiple dry years (San Diego 2021). The proposed project would make up less than 1 percent of the City's 2030 water demand. Additionally, the City has a Water Shortage Contingency Plan and is focused on long-term water savings through site surveys, hardware replacement, and irrigation and landscape efficiencies (San Diego 2021). Therefore, the City would have sufficient water supplies to accommodate the proposed project.

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

Less Than Significant Impact. As indicated in Impact 3.19(a), the proposed project would generate approximately 8,327 gallons of wastewater per day, which would make up less than 1 percent of the South Bay Water Reclamation Plant's treatment capacity of 15 million gallons per day. Therefore, the treatment plant would have sufficient capacity to accommodate the proposed project. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. Waste from the proposed project would be transported to the Miramar Landfill at 5180 Convoy Street, San Diego, California. The Miramar Landfill has a maximum daily permitted disposal rate of 8,000 tons per day, a remaining capacity of 11,080,871 cubic yards, and a cease operation date of January 1, 2031 (CalRecycle 2024a).

Using a solid waste generation rate of 0.007 pound per square foot per day (lb/sq ft/day) for Public/Institutional uses, the proposed project would generate 119.7 lb/day[7] (0.05985 tons per day) (CalRecycle

[7] 17,100 square feet x 0.007 lb/sq ft/ day = 119.7 lb/day

2024b). The proposed project would make up less than 1 percent of the maximum daily permitted disposal rate of 8,000 tons per day. 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. Solid waste would be generated during construction and operation of the proposed project. The proposed project would comply with all regulations pertaining to solid waste, such as the California Integrated Waste Management Act and the City's recycling and waste programs. The District and its construction contractor would comply with all applicable laws and regulations and make every effort to reuse and/or recycle the construction debris that would otherwise be taken to a landfill. Hazardous waste, such as paint used during construction, would be disposed of only at facilities permitted to receive them, in accordance with local, state, and federal regulations. The proposed project would comply with all applicable local, state, and federal statutes and regulations related to solid waste disposal. Therefore, impacts would be less than significant.

3.20 WILDFIRE

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

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?

Less Than Significant Impact. The project site is not in a very high fire hazard severity zone (VHFHSZ). The proposed project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project site and surrounding

properties during construction and operation. Additionally, both the City Fire Marshal and DSA would be required to approve fire access around the site. As part of the DSA process, a Fire and Life Safety Review would be conducted when the building plans are reviewed to ensure occupants can safely exit the site in case of a fire. The proposed project would not result in inadequate emergency access, nor would it impair an emergency response or 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. There are three primary factors used in assessing wildfire hazards—topography, weather, and fuel. The project site is predominantly flat and in an urbanized environment. The proposed project would not impact weather or topography. The project site is undeveloped and contains vegetation. Developing the site with the proposed uses would reduce the amount of exposed vegetation that could be used as fuel. Therefore, the proposed project would reduce fire risk compared to existing conditions. Additionally, development on the project site would be subject to compliance with the CBC, CFC, and the DSA's requirements. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The proposed project would require connections to utilities such as electricity, water, and sewer. The utilities would be installed to meet service requirements. The construction of infrastructure for the proposed project would not directly increase fire risk; the project site is not in a VHFHSZ. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The project site is within Zone X, Area of Minimal Flood Hazard, and landslides or indications of deep-seated slope instability were not observed at the project site. Additionally, the project site is not within a VHFHSZ. Construction activities related to the proposed project would be subject to compliance with the CBC, CFC, and DSA requirements, and would include BMPs. Therefore, impacts would be less than significant.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Less Than Significant Impact With Mitigation Incorporated. The proposed project would construct a CERC building and recreational facilities onsite. The project would comply with the MBTA bird nesting season restrictions and therefore would not result in impacts to nesting regulatory birds protected by the MBTA. The proposed project would implement Mitigation Measures BIO-1 to reduce impacts to Diegan Coastal Sage Scrub – Disturbed habitat, and Mitigation Measure BIO-2 through BIO-4 would be required to reduce impacts to sensitive wildlife species. Additionally, Mitigation Measure CUL-1, which requires that if any evidence of cultural resources is discovered, all work within the vicinity of the find will stop until a qualified archaeological monitor can assess the find and make recommendations, would be implemented. Also, the proposed project would implement Mitigation Measure CUL-1, which requires that if any evidence of tribal cultural resources is discovered, the qualified archaeological monitor shall contact the most closely-related tribe to assess the significance and provide recommendations on how to proceed. Therefore, implementation of Mitigation Measures BIO-1 through BIO-4, and CUL-1 would reduce impacts to biological, cultural, and tribal cultural resources to less than significant.

3. Environmental Analysis

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

Less Than Significant Impact. The proposed project would include construction within the project site boundaries. The proposed project as well as other projects in the project area would be required to comply with all applicable regulations and implement mitigation measures. Therefore, the proposed project would not result in a substantial cumulative impact. Impacts would be less than significant.

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

Less Than Significant Impact With Mitigation Incorporated. As demonstrated in this Initial Study, the proposed project would not substantially increase environmental effects that would directly or indirectly affect human beings. The proposed project would implement Mitigation Measure GEO-1 which requires the District to comply with the recommendations of the Geotechnical report. Therefore, impacts would be less than significant with mitigation incorporated.

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