

ENCINITAS UNION SCHOOL DISTRICT

PAUL ECKE CENTRAL ELEMENTARY SCHOOL REBUILD PROJECT

February 2026 | Draft Environmental Impact Report

State Clearinghouse No. 2025100767



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for Encinitas Union School District

Encinitas Union School District

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EXECUTIVE SUMMARY

ES.1 INTRODUCTION

This executive summary has been prepared in compliance with the California Environmental Quality Act (CEQA) Guidelines Section 15123. This Draft Environmental Impact Report (DEIR) addresses the environmental effects associated with the implementation of the proposed Paul Ecke Central Elementary School Rebuild Project (proposed project). CEQA requires that local government agencies consider the environmental consequences before acting on projects over which they have discretionary approval authority. An EIR analyzes potential environmental consequences to inform the public and support informed decisions by local and state governmental agency decision makers.

This EIR has been prepared pursuant to the requirements of CEQA and the Encinitas Union School District's (EUSD or District) CEQA procedures. The District, as the lead agency, has reviewed and revised all submitted drafts, technical studies, and reports as necessary to reflect its own independent judgment, including reliance on District technical personnel from other departments and review of all technical subconsultant reports.

ES.2 ENVIRONMENTAL PROCEDURES

This EIR has been prepared pursuant to CEQA and the CEQA Guidelines to assess the environmental effects associated with implementation of the proposed project as well as anticipated future discretionary actions and approvals. CEQA established the following six main objectives for an EIR:

1. Disclose to decision makers and the public the significant environmental effects of proposed activities.
2. Identify ways to avoid or reduce environmental damage.
3. Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
4. Disclose to the public reasons for agency approval of projects with significant environmental effects.
5. Foster interagency coordination in the review of projects.
6. Enhance public participation in the planning process.

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An EIR is the most comprehensive form of environmental documentation in CEQA and the CEQA Guidelines; it is intended to provide an objective, factually supported analysis, and full disclosure of the environmental consequences of a proposed project with the potential to result in significant, adverse environmental impacts.

An EIR is one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Before approving a proposed project, the lead agency must consider the information in the EIR, determine whether the EIR was prepared in accordance with CEQA and the CEQA Guidelines, determine that it reflects the independent judgment of the lead agency, adopt findings concerning the project's significant environmental impacts and alternatives, and adopt a statement of overriding considerations if significant impacts cannot be avoided.

ES.2.1 Draft Environmental Impact Report Organization

Executive Summary. Summarizes the background and description of the proposed project, the format of this EIR, project alternatives, any critical issues that need to be resolved, and the potential environmental impacts and recommended mitigation measures identified for the project.

Chapter 1: Introduction. Describes the purpose of this EIR, background on the project, the Notice of Preparation, the use of incorporation by reference, and Final EIR certification.

Chapter 2: Project Description. Provides a detailed description of the project, including its objectives, its area and location, approvals anticipated to be required as part of the project, necessary environmental clearances, and the intended uses of this EIR.

Chapter 3: Environmental Analysis. Each environmental topic is analyzed in a separate section that discusses the applicable regulatory framework; existing conditions; the significance criteria used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the project; the potential adverse and beneficial effects of the project; the level of impact significance with and without mitigation; and the potential cumulative impacts of the proposed project and other existing, approved, and proposed projects in the area.

Chapter 4: Alternatives to the Proposed Project. Describes alternatives to the proposed project and compares their impacts to the impacts of the proposed project.

Chapter 5: Other CEQA Considerations. Provides a discussion of effects found not to be significant, significant and unavoidable impacts, significant irreversible changes to the environment, and growth-inducing effects.

Chapter 6: Report Preparers. Includes a list of people who prepared this DEIR.

Appendices. The appendices for this document include the following supporting documents:

- Appendix 1-1: Notice of Preparation (NOP) and NOP Comment Letters
- Appendix 3.2-1: Air Quality and Greenhouse Gas Emissions Modeling
- Appendix 3.2-2: Health Risk Assessment
- Appendix 3.3-1: Cultural Resources Assessment
- Appendix 3.3-2: Historic Building Survey for Building A
- Appendix 3.3-3 Secretary of the Interior (SOI) Compatibility Assessment for the Old Schoolhouse
- Appendix 3.6-1: Phase I Environmental Site Assessment
- Appendix 3.6-2: Title 5 School Facilities Evaluation
- Appendix 3.6-3: Pipeline Safety Hazard Assessment
- Appendix 3.6-4: Rail Safety Study
- Appendix 3.7-1: Noise Modeling Data
- Appendix 3.8-1: Traffic/Circulation Analysis

ES.2.2 Type and Purpose of this Draft Environmental Impact Report

As described in the CEQA Guidelines, different types of EIRs are used for varying situations and intended uses.

This DEIR has been prepared as a “Project EIR,” defined by CEQA Guidelines Section 15161 (California Code of Regulations, Title 14, Division 6, Chapter 3). This type of EIR examines the environmental impacts of a specific development project and should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation.

ES.3 PROJECT LOCATION

The City of Encinitas is bounded by the City of Carlsbad to the north, the Pacific Ocean to the west, the City of Solana Beach to the south, and unincorporated San Diego County to the east. Regional access to the Paul Ecke Central Elementary School is provided by North Coast Highway 101 (U.S. 101) and Interstate 5 (I-5), which are 184 feet west and 0.33 mile east of the project site, respectively.

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ES.4 SUMMARY OF THE PROPOSED PROJECT

The proposed project would include a complete reconstruction of the campus, with the exception of the Old Schoolhouse. The proposed project is intended to improve access, functionality, address traffic and parking concerns, and enhance the educational environment.

The Administration Building, located in the northwestern portion of the site, is 7,120 square feet and would be reduced to 6,302 square feet upon project completion. The Multipurpose Room (MPR) Building would be relocated from the northeastern portion of the site to the western portion of the site, south of the Administration Building. The MPR Building square footage would increase from 9,892 square feet to 15,617 square feet. The Classroom Buildings would remain in the northern and eastern portions of the site, and the square footages would increase from 38,322 square feet to 48,752 square feet. There would be outdoor collaboration spaces with seating adjacent to the classrooms. The Flex 300 Building would be a new building on campus and would be 3,379 square feet. The Old Schoolhouse, which currently includes classrooms, would include a full structural retrofit with major interior and limited exterior upgrades, and would be a library/media center. While the District does not intend on changing enrollment, student capacity, or number of staff/teachers, the number of formal classrooms would decrease from 33 to 30.

The proposed project would include a variety of amenities such as a community plaza and teacher's lounge, an eight-foot-wide "Heritage" concrete walkway, a gathering plaza, an open wood structure (the Barn), learning garden, citrus grove, an outdoor lab, a kinder play area, a nature play area, 30,000-square-foot field with an eight-foot-wide track, painted hardcourts, a vermiculture educational area, and covered lunch courtyard.

Currently, the project site can be accessed via five driveways—one in the western portion of the site along North Vulcan Avenue and four along Union Street at the northern portion of the site. The proposed project would reduce the number of driveways from five to three—two along the western portion of the site off North Vulcan Avenue and one at the northeastern parking lot. The western parking lot and drop-off/pick-up zone off North Vulcan Avenue would be expanded to extend much of the western boundary of the project site. The proposed project would also include a new crosswalk and stop sign intersection at the drop-off/pick-up zone entry along North Vulcan Avenue (southwestern portion of the project site). The parking lot in the northeastern portion of the site would include a median in the center of the parking lot that would improve the flow and circulation within the parking lot. New diagonal parking spaces would be constructed off Union Street.

Construction of the proposed project would occur in one phase and is anticipated to start in June 2026 and end in August 2027. During construction, the District would temporarily relocate students to Park Dale Lane Elementary School and El Camino Creek Elementary School during the

2026–2027 school year. While busing is not currently available, the District would arrange bus transportation between an established area and the temporary campuses while construction is underway. Additionally, the Leucadia Farmers Market would move to Oak Crest Middle School during construction and would move back to the project site once construction is completed.

ES.5 SUMMARY OF PROJECT ALTERNATIVES

The CEQA Guidelines Section 15126.6(a) states that an EIR must address “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The alternatives in this DEIR were based, in part, on their potential to reduce or eliminate the impacts determined to be potentially significant for implementation of the proposed project (see Table ES-1, *Summary of Significant Environmental Impacts and Mitigation Measures*). The project alternatives were not reviewed for financial feasibility. Project alternatives are assessed in further detail in Chapter 4, *Alternatives to the Proposed Project*.

ES.5.1 No Project Alternative

CEQA Guidelines Section 15126.6(e) requires that a “No Project” Alternative be evaluated. This analysis must discuss the existing site conditions as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved. Under the No Project Alternative, District would not implement any portion of the proposed project, and none of the mitigation measures identified in this DEIR would be necessary. None of the proposed improvements would occur, and the project site would continue to operate under its current conditions and existing layout. The underlying issues with utilities, energy efficiency, drainage, and circulation and the need for modernized facilities would remain unaddressed. The Old Schoolhouse would not be retrofitted, and the campus would not be modernized. The temporary relocation of students or faculty to off-site schools, the temporary relocation of the Leucadia Farmers Market to an off-site location, and all planned off-site traffic and utility improvements would not be implemented. Under the No Project Alternative, none of the objectives for the proposed project would be met.

ES.5.2 Partial Reconstruction Alternative

Under this alternative, portions of the campus would be reconstructed, and Building A (Administration Building) and the Old Schoolhouse would be retrofitted with limited exterior upgrades and major interior upgrades. Because Building A would not be demolished, the configuration of Building A would limit the District’s ability to redesign the rest of the campus,

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and therefore, some campuswide amenities would not be constructed. This alternative would meet all of the project objectives but to a lesser extent than the proposed project.

ES.5.3 Large-Scale Modernization Alternative

Under this alternative, the campus would undergo a large-scale modernization involving numerous upgrades, including replacing portable classrooms, reconstructing sewer systems, remodeling bathrooms, installing new flooring, upgrading HVAC, improving landscaping and drainage systems, reconfiguring interior spaces to meet code compliance, addressing parking challenges, modernizing Building A, adding outdoor learning spaces and new playgrounds, installing new roofing, updating finishes, and upgrading the fire alarm system. However, because this scope would push modernization costs past the 50 percent threshold of the cost for a new build, state law would require seismic upgrades, rendering this a cost-ineffective alternative for the District. This alternative would meet all project objectives but to a lesser extent than the proposed project.

ES.6 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. For the proposed project, the major issues to be resolved include decisions by the lead agency regarding the following:

1. Whether this EIR adequately describes the environmental impacts of the project.
2. Whether the benefits of the project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance.
3. Whether the proposed land use changes are compatible with the character of the existing area.
4. Whether the identified goals, policies, or mitigation measures should be adopted or modified.
5. Whether there are other mitigation measures that should be applied to the project besides the mitigation measures identified in the EIR.
6. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic project objectives.

ES.7 AREAS OF CONTROVERSY

In accordance with Section 15123(b)(2) of the CEQA Guidelines, the EIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the

public. Prior to preparation of the DEIR, the District issued a Notice of Preparation (NOP) on October 22, 2025. The CEQA-mandated scoping period for this EIR started on October 22, 2025, ended on November 20, 2025, during which interested agencies and the public could submit comments about the potential environmental impacts of the proposed project. During this time, the District received comment letters from the Native American Heritage Commission, Department of Toxic Substances Control (DTSC), and California Department of Transportation. Appendix 1-1, *Notice of Preparation (NOP) and NOP Comment Letters*, of this DEIR contains the NOP as well as the comments received by the District in response to the NOP.

The following list includes issues that are likely to be of particular concern to agencies and interested members of the public during the environmental review process. Though every concern applicable to the CEQA process is addressed in this DEIR, this list is not necessarily exhaustive; rather, it attempts to capture concerns that are likely to generate the greatest interest based on the input received during the scoping process.

The DTSC formally notified the District that the use of state funding triggers mandatory compliance with Education Code Section 17210 et seq., requiring a hazardous materials assessment.

ES.8 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table ES-1 summarizes the conclusions of the environmental analysis in this DEIR. Impacts are identified as significant or less than significant, and mitigation measures are identified for all significant impacts. The level of significance with imposition of the mitigation measures is also presented.

Chapter 5, *Other CEQA Considerations*, concluded that regarding agriculture and forestry resources, biological resources, geology and soils, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, utilities and services systems, and wildfire, impacts would not be significant.

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Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
AESTHETICS			
Impact AES-1: Would the project have a substantial adverse effect on a scenic vista?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
Impact AES-2: Would the project substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings?	No Impact	No mitigation measures are required.	No Impact
Impact AES-3: In nonurbanized areas, would the project 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	No mitigation measures are required.	Less-than-Significant Impact

Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact AES-4: Would the project expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
AIR QUALITY			
Impact AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
Impact AQ-2: Would the project 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?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
Impact AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?	Potentially Significant Impact	Mitigation Measure AIR-1: The Encinitas Union School District (District) shall require the incorporation of the following to reduce air pollutant emissions during construction activities: ▪ Prior to the request for bids for construction contractors, the Director of Facilities and Safety or designee shall specify in the construction bid that the construction contractor shall use equipment that meets the United States Environmental Protection Agency (EPA)-Certified Tier 4 Interim or stricter emissions	Less-than-Significant Impact

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Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		standards for project-related off-road diesel-powered construction equipment during all ground-disturbing including but not limited to site preparation, grading, and asphalt paving. ▪ Prior to construction, the project engineer shall ensure that all construction plans clearly show the requirement for EPA Tier 4 Interim or higher emissions standards for construction equipment over 50 horsepower. ▪ During project construction, the construction contractor shall ensure that all emissions control devices used by the contractor achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by California Air Resources Board regulations, unless it can be demonstrated to the District that such equipment is not commercially available. For purposes of this measure, “commercially available” shall mean the availability of Tier 4 Interim and Tier 4 Final engines similar to the availability for other large-scale construction projects in the City occurring at the same time and taking into consideration factors such as (i) potential significant delays to critical-path timing of construction and (ii) geographic proximity to the project site of Tier 4 Interim and Tier 4 Final equipment. Where such equipment is not commercially available, as demonstrated by the construction contractor, Tier 3 equipment retrofitted with a California Air Resources Board’s Level 3 Verified Diesel Emissions Control Strategy (e.g., diesel particulate filter) shall be used. ▪ During construction, the construction contractor shall maintain a list of all operating equipment in use on the project site for	

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Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		verification by the Director of Facilities and Safety or designee. The construction equipment list shall state the makes, models, Engine Family Number, Equipment Identification Numbers, and numbers of construction equipment onsite. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to Division of the State Architect (DSA) and verified by the District.	
Impact AQ-4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
CULTURAL AND PALEONTOLOGICAL RESOURCES			
Impact CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	Potentially Significant Impact	Mitigation Measure CUL-1: Prior to any construction activities at, and adjacent to, the Old Schoolhouse, the District shall retain a qualified architectural historian to prepare a Historic Building Survey (HABS)-like report, which shall thoroughly document the historic significance of the Old Schoolhouse through a field survey and photographs. The HABS-like report shall be kept on file with the District. Construction activities at, and adjacent to, the Old Schoolhouse shall commence after the HABS-like report is completed.	Significant and Unavoidable Impact

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Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	Potentially Significant Impact	Mitigation Measure CUL-2: If archaeological resources are encountered during ground-disturbing activities, work in the immediate area shall cease, and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find(s). If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted and will be reported to the Encinitas Union School District. If significant Native American cultural resources are discovered, the archaeologist on call shall contact the applicable Native American tribal contact(s). If requested by the Native American tribe(s), District, or archaeologist on call shall, in good faith, consult on the discovery and its disposition (e.g., avoidance, preservation, reburial, return of artifacts to tribe).	Less-than-Significant Impact
Impact CUL-3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
Impact CUL-4: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant Impact	Mitigation Measure CUL-3: A qualified paleontologist shall be on call in the event that paleontological resources are found during ground-disturbing activities. The paleontologist shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossils. The paleontologist shall be empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner.	Less-than-Significant Impact

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Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
ENERGY			
Impact ENE-1: Would the project 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	No mitigation measures are required.	Less-than-Significant Impact
Impact ENE-2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
GREENHOUSE GAS EMISSIONS			
Impact GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
Impact GHG-2: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact

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Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
HAZARDS AND HAZARDOUS MATERIALS			
Impact HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
Impact HAZ-2: Would the project 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?	Potentially Significant Impact	Mitigation Measure HAZ-1: Upon completion of a Phase I Addendum (soil sampling) report (report), the report shall be submitted to the California Department of Toxic Substances Control (DTSC) for review and approval of the report's conclusions and recommendations. If the report concludes that potential contaminants of concern have not been identified at or above the regulatory screening levels, then the report shall recommend that DTSC provide the Encinitas Union School District (EUSD) with a "No Further Action" letter of determination for the project site. If the report concludes that contaminants of concern have been identified above regulatory screening levels, then the report shall recommend further assessment. Depending on the extent of soil contamination identified, a remediation plan may be required to protect human health and the environment. EUSD shall enter into an environmental oversight agreement with DTSC to ensure that all applicable local, state, or federal regulations are followed during the remediation process. The remedial actions shall be implemented and completed before construction is completed and prior to occupancy.	Less-than-Significant Impact

Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
Impact HAZ-4: Would the project be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
Impact HAZ-5: For a project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No mitigation measures are required.	No Impact

EXECUTIVE SUMMARY

Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact HAZ-6: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
Impact HAZ-7: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	No Impact	No mitigation measures are required.	No Impact
NOISE			
Impact NOI-1: Would the project generate 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?	Potentially Significant Impact	■ Mitigation Measure NOI-1: The Encinitas Union School District (EUSD or District) construction contract bid shall require the chosen construction contractor(s) to prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan shall be included as part of the permit application drawing set and as part of the construction drawing set. The Construction Noise Control Plan shall include, but not be limited to the following: ■ Construction activity is limited to the hours between 7:00 am and 7:00 pm Mondays through Saturdays, as prescribed in Municipal Code Section 9.32.410. ■ During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques wherever feasible (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts,	Less-than-Significant Impact

Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		engine enclosures, and acoustically attenuating shields or shrouds). ▪ Impact tools (e.g., jack hammers and hoe rams) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools. ▪ Stationary equipment such as generators and air compressors shall be located as far as feasible from nearby noise-sensitive uses. ▪ Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors. ▪ At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours as well as the telephone numbers of the District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the District. ▪ Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes. ▪ During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes	

EXECUTIVE SUMMARY

Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.	
Impact NOI-2: Would the project generate excessive groundborne vibration or groundborne noise levels?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
Impact NOI-3: For a project 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	No mitigation measures are required.	No Impact
TRANSPORTATION			
Impact TRANS-1: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact

EXECUTIVE SUMMARY

Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact TRANS-2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
Impact TRANS-3: Would the project 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	No mitigation measures are required.	Less-than-Significant Impact
Impact TRANS-4: Would the project result in inadequate emergency access?	Less-than-Significant Impact	No mitigation measures are required.	Less-than-Significant Impact
TRIBAL CULTURAL RESOURCES			
Impact TCR-1: 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	Potentially Significant Impact	Mitigation Measure TCR-1: If tribal cultural resources are encountered at Paul Ecke Elementary School, Park Dale Lane Elementary School, or El Camino Creek Elementary School during ground-disturbing activities, the District shall retain a tribal monitor who shall only be present on-site during the construction phases that involve ground-disturbing activities. The tribal monitor shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the ground-disturbing activities are completed or when the tribal monitor	Less-than-Significant Impact

EXECUTIVE SUMMARY

Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
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)? ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?		has indicated that the project site has a low potential for affecting tribal cultural resources. Upon discovery of any tribal cultural resources, construction activities shall cease in the immediate vicinity of the find until the tribal monitor can assess the find. The evaluation of all tribal cultural resources unearthed by project construction activities shall be evaluated by a qualified archaeologist and/or tribal monitor. If the resources are Native American in origin, the tribal monitor shall coordinate with the District regarding treatment and curation of these resources as well as notifying local tribes of the find. Typically, the tribe(s) shall request reburial or preservation for educational purposes. The District may continue work on other parts of the project site while evaluation and, if necessary, mitigation take place (CEQA Guidelines Section 15064.5[f]). If the tribal monitor determines a resource to constitute a “historical resource” or “unique archaeological resource,” time and funding sufficient to allow for implementation of avoidance measures or appropriate mitigation must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Section 21083.2(b) for unique archaeological resources. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource. The District shall be responsible for ensuring that a public, nonprofit institution with a research interest in the materials curate any historic archaeological material that is not Native American in origin if such an institution agrees to accept the material. If no institution accepts the archaeological material, the District shall	

Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		offer it to a local historical society for educational purposes or retain the material and use it for educational purposes.	

EXECUTIVE SUMMARY

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1. INTRODUCTION

1.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. This Draft Environmental Impact Report (DEIR) has been prepared to satisfy CEQA and the CEQA Guidelines. The EIR is the public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate possible ways to reduce or avoid environmental damage, and to identify alternatives to the project. The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

The lead agency means “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment” (CEQA Section 21067). The Encinitas Union School District (EUSD or District) has the principal responsibility for approval of the Paul Ecke Central Elementary School Rebuild Project (proposed project). For this reason, EUSD is the CEQA lead agency for this project. The District will review and consider this EIR in its decision to approve, revise, or deny the project.

The intent of the DEIR is to provide sufficient information on the potential environmental impacts of the proposed project to allow the District to make an informed decision regarding approval of the project. Specific discretionary actions to be reviewed by the District are described in Section 2.7, *Actions Requested*.

This DEIR has been prepared in accordance with requirements of the following:

CEQA of 1970, as amended (Public Resources Code, Sections 21000 et seq.)

State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations, Sections 15000 et seq.)

The overall purpose of this draft is to inform the lead agency, responsible agencies, decision makers, and the general public about the environmental effects of the development and operation of the proposed project. This DEIR addresses effects that may be significant and

1. INTRODUCTION

adverse; evaluates alternatives to the project; and identifies mitigation measures to reduce or avoid adverse effects.

1.2 ENVIRONMENTAL REVIEW PROCESS

1.2.1 Notice of Preparation

The District determined that an EIR would be required for this project and issued a Notice of Preparation (NOP) on October 22, 2025, for a 30-day public review period from October 22, 2025, to November 20, 2025 (Appendix 1-1). The NOP was distributed to state, regional, and local governments and agencies to solicit comments and inform the public of the potential environmental issues that the EIR would address. The District held a scoping meeting on November 5, 2025.

The NOP process helps determine the scope of the environmental issues to be addressed in the DEIR. Based on this process, certain environmental categories were identified as having the potential to result in significant impacts. Issues considered potentially significant are addressed in this DEIR, and issues identified to result in no impacts or less-than-significant impacts are addressed in Chapter 5, *Other CEQA Considerations*, of this DEIR.

1.2.2 Draft Environmental Impact Report

The scope of the DEIR was determined based on the NOP and comments received in response to the NOP. Pursuant to Sections 15126.2 and 15126.4 of the CEQA Guidelines, the DEIR should identify any potentially significant adverse impacts and recommend mitigation that would reduce or eliminate these impacts to levels of insignificance. The information in Chapter 2, *Project Description*, establishes the basis for analyzing future, project-related environmental impacts.

IMPACTS CONSIDERED LESS THAN SIGNIFICANT

The District determined that 11 environmental impact categories were not significantly affected by or did not affect the proposed project. Those categories are not discussed in detail in this DEIR but can be found in Chapter 5, *Other CEQA Considerations*, as follows:

- Agriculture and Forestry Resources
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality
- Land Use and Planning

1. INTRODUCTION

- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire

POTENTIALLY SIGNIFICANT ADVERSE IMPACTS

The District determined that nine environmental factors have potentially significant impacts if the proposed project is implemented. Those categories are discussed in detail in this DEIR as follows:

- Aesthetics
- Air Quality
- Cultural and Paleontological Resources
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise
- Transportation
- Tribal Cultural Resources

UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS

Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. Significant and unavoidable adverse impacts, as defined by CEQA, were identified in the DEIR to occur as a result of implementation of the proposed project related to the following category:

- Cultural and Paleontological Resources

1.2.3 Final EIR Certification

This DEIR is being circulated for public review for 45 days. Interested agencies and members of the public are invited to provide written comments on the DEIR to the District address shown on the title page of this document. Upon completion of the 45-day review period, the District will review all written comments received and prepare written responses for each. A Final EIR (FEIR) will incorporate the received comments, responses to the comments, and any changes to the DEIR that result from comments. The FEIR will be presented to the EUSD Board of Trustees for

1. INTRODUCTION

potential certification as the environmental document for the project. All persons who comment on the DEIR will be notified of the availability of the FEIR and the date of the public hearing before the EUSD Board of Trustees.

The DEIR is available to the general public for review at the following locations:

- Encinitas Union School District, Business Services Department, 101 South Rancho Santa Fe Road, Encinitas, CA 92024
- Paul Ecke Central Elementary School, 185 Union Street, Encinitas, CA 92024
- Encinitas Union School District website: <https://www.eusd.net/departments/business-services/facilities-safety>

1.3 MITIGATION MONITORING

Public Resources Code Section 21081.6 requires that agencies adopt a Mitigation Monitoring and Reporting Program (MMRP) for any project for which it has made findings pursuant to Public Resources Code Section 21081 or adopted a Negative Declaration pursuant to 21080(c). Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR or Negative Declaration.

The MMRP for the proposed project will be completed as part of the FEIR, prior to consideration of the project by the EUSD Board of Trustees.

1.4 INCORPORATION BY REFERENCE

The following documents are incorporated by reference into this DEIR, consistent with Section 15150 of the CEQA Guidelines, and they are available for review at the District Office:

- City of Encinitas Municipal Code
- City of Encinitas General Plan

2. PROJECT DESCRIPTION

2.1 INTRODUCTION

The purpose of this chapter is to describe the proposed rebuild of the Paul Ecke Central Elementary School, with the exception of the Old Schoolhouse (proposed project), to the public, reviewing agencies, and decision makers. Pursuant to the California Environmental Quality Act (CEQA) and the CEQA Guidelines (CEQA Guidelines, Section 15124), an environmental impact report (EIR) should contain a description of the proposed project that includes the following:

- a) The precise location and boundaries of the proposed project;
- b) A statement of the objectives sought by the proposed project, including the underlying purpose of the project;
- c) A general description of the proposed project's technical, economic, and environmental characteristics; and
- d) A statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of permits and other approvals required to implement the proposed project, and a list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies.

This DEIR has been completed in accordance with CEQA, which requires that state and local public agencies analyze proposed projects to determine potential impacts on the environment and disclose any such impacts. The Encinitas Union Elementary School District (EUSD or District) is the lead agency for the environmental review of the proposed project.

An adequate project description should not supply extensive detail beyond that needed for evaluation and review of environmental impacts. Accordingly, this chapter describes the necessary details of the proposed project that are critical in assessing the direct, indirect, long-term, and temporary impacts associated with project implementation. This chapter provides a detailed description of the proposed project, including the location, setting, and characteristics of the project site, as well as the project objectives, the principal project components, and required permits and approvals.

2. PROJECT DESCRIPTION

2.2 PROJECT BACKGROUND

After thorough analysis of the project site and analyzing the current and future needs of students, the District has decided to rebuild the Paul Ecke Central Elementary School with funding from Bond Measure Z.

On February 6, 2025, the District hosted a “Superintendent Chat” to provide parents with an overview of the reconstruction plans for the project site. Parents and community members in attendance had the opportunity to ask questions and give input. The community input design sessions for the proposed project were held on February 26, 2025; March 12, 2025; and March 20, 2025.

2.3 PROJECT LOCATION

2.3.1 Regional Setting

The City of Encinitas is bounded by the City of Carlsbad to the north, the Pacific Ocean to the west, the City of Solana Beach to the south, and unincorporated San Diego County to the east. Regional access to the Paul Ecke Central Elementary School is provided by North Coast Highway 101 (U.S. 101) and Interstate 5 (I-5), which are 184 feet west and 0.33-mile east of the project site, respectively (see Figure 2-1, *Regional Location*, and Figure 2-2, *Local Vicinity*).

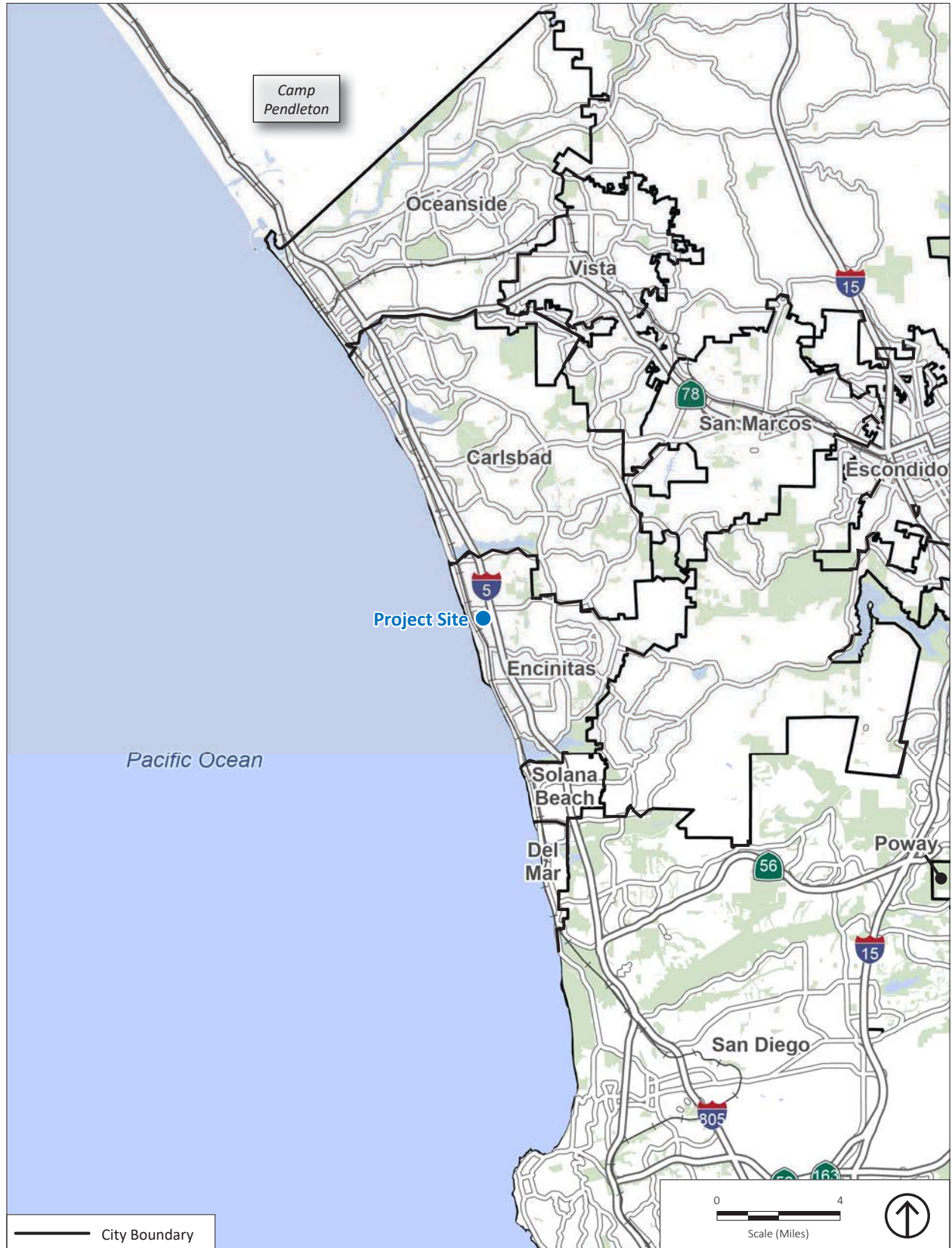
2.3.2 Local Setting

The 7.35-acre Paul Ecke Central Elementary School is at 185 Union Street in the City of Encinitas, San Diego County (Assessor’s Parcel Number [APN] 256-301-0100) and is surrounded by residential uses to the north and south, Orpheus Park and residences to the east, and commercial uses to the west across North Vulcan Avenue and the railroad tracks (see Figure 2-3, *Aerial Photograph*).

2.4 ENVIRONMENTAL SETTING

2.4.1 Existing Land Use

The project site has a General Plan land use designation of Public/Semi-Public (P/SP), is zoned Public/Semi-Public (N-P/SP), and is within the North 101 Corridor Specific Plan area (Encinitas 2025a; Encinitas 2025b). The 7.35-acre project site is entirely developed with, and operates as, an elementary school campus with classroom and administrative buildings, portable classrooms, asphalt walkways, hardcourts, a garden, parking lots, and fields (see Figure 2-3).



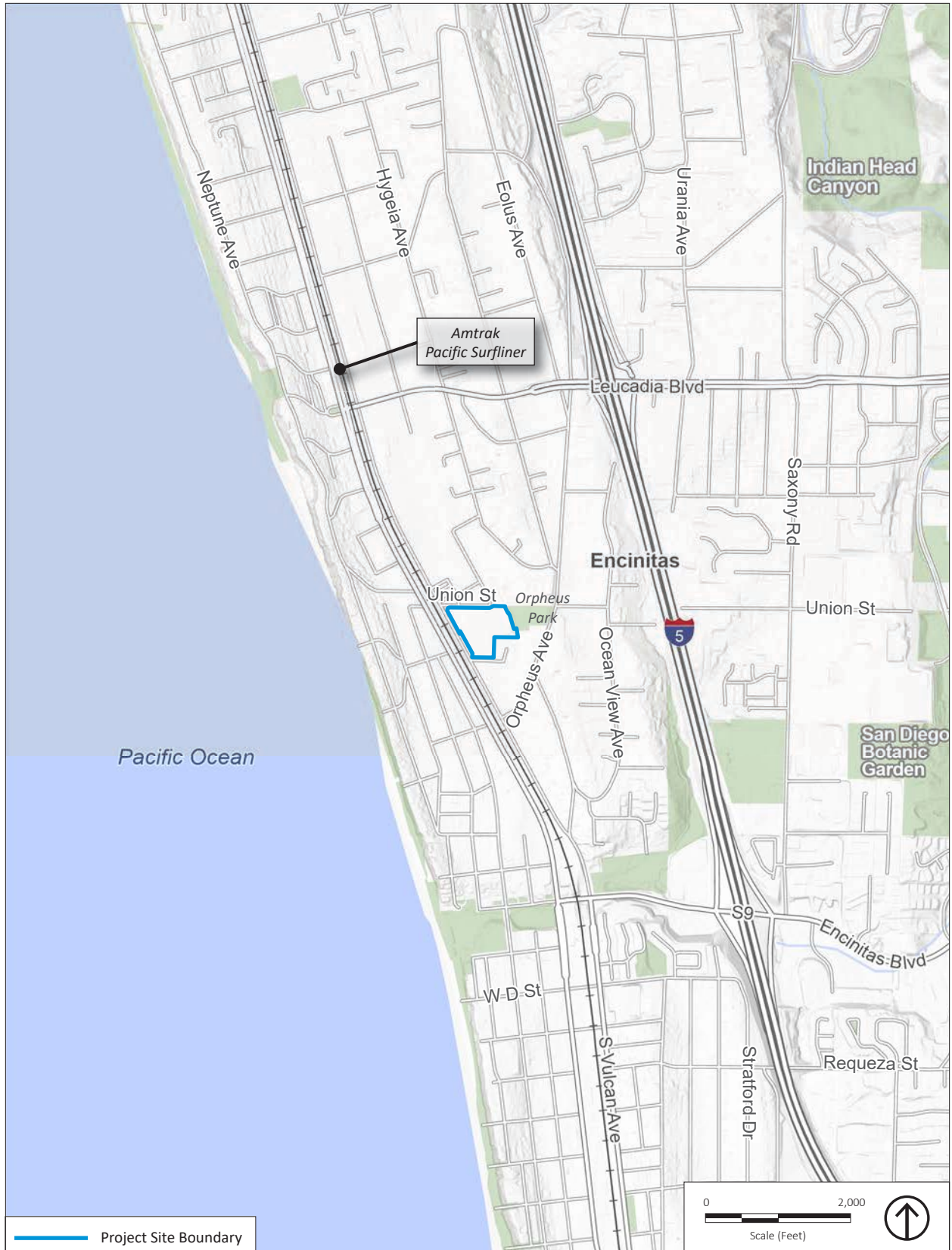
Source: Generated using ArcMap 2025.

Figure 2-1
Regional Location

2. PROJECT DESCRIPTION

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PAUL ECKE CENTRAL ELEMENTARY SCHOOL REBUILD PROJECT EIR
ENCINITAS UNION SCHOOL DISTRICT



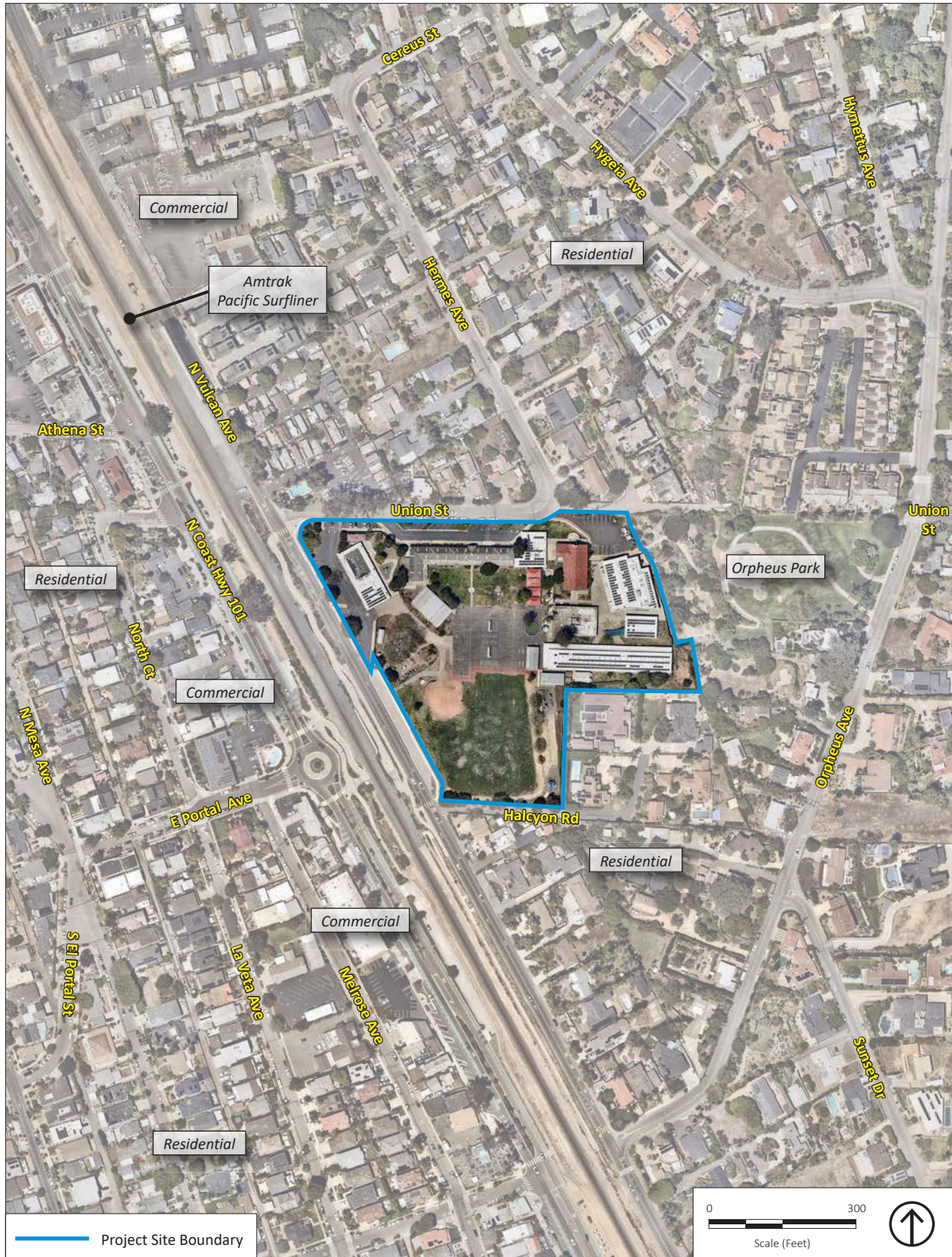
Source: Generated using ArcMap 2025.

Figure 2-2
Local Vicinity

2. PROJECT DESCRIPTION

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PAUL ECKE CENTRAL ELEMENTARY SCHOOL REBUILD PROJECT EIR
ENCINITAS UNION SCHOOL DISTRICT



Source: Nearmap 2025.

Figure 2-3
Aerial Photograph

2. PROJECT DESCRIPTION

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2. PROJECT DESCRIPTION

The Paul Ecke Central Elementary School serves students in kindergarten through sixth grade and has 33 classrooms. The student capacity of the school is approximately 750 students, and there are approximately 80 teachers/staff members. The 2024–2025 enrollment at the school is 569 students (CDE 2025).

The District has a joint use agreement with the Leucadia Farmers Market to utilize the hardcourt and sports field at the project site on Sundays, from 10:00 am to 2:00 pm.

2.4.2 Surrounding Land Use and Zoning

The residential land uses to the north are designated Residential 15.01-25 dwelling units/acre (du/ac) (R25) and Residential 5.01-8 du/ac (R8); Orpheus Park and the residential uses to the east are designated Ecological Resource/Open Space/Park (ER/OS/PK) and Residential 2.01-3 du/ac (R3), respectively; the residential uses to the south are designated R8 and R3; and the commercial uses to the west are designated General Commercial (GC) (Encinitas 2025a).

The residential uses to the north are zoned Residential 25 (N-R25) and Residential 8 (R8); Orpheus Park and the residential uses to the east are zoned Ecological Reserve/Open Space (ER/OS/PK) and Residential 3 (N-R3); the residential uses to the south are zoned N-R8 and R3; and the commercial uses to the west are zoned Commercial Mixed 1 (N-CM-1) (Encinitas 2025b).

2.5 STATEMENT OF PROJECT OBJECTIVES

Section 15124(b) of CEQA Guidelines requires a project description to include a statement of the objectives of a project that addresses the underlying purpose. The following specific objectives have been identified for the proposed project:

- Rebuild and modernize the campus to enhance and facilitate students' learning environment.
- Upgrade outdoor collaboration spaces adjacent to classrooms to provide improved learning experiences.
- Address on-site utility, energy efficiency, and drainage issues.
- Balance preservation of the Old Schoolhouse Building with the District's need to address safety, accessibility, and operational requirements.
- Improve circulation, access, and functionality, and reduce off-site congestion by increasing on-site parking.

2. PROJECT DESCRIPTION

2.6 PROJECT CHARACTERISTICS

2.6.1 Proposed Improvements

The proposed project would include a complete reconstruction of the campus with the exception of the Old Schoolhouse. The proposed project is intended to improve access, functionality, address traffic and parking concerns, and enhance the educational environment. The proposed improvements are shown in Figure 2-4, *Conceptual Site Plan*. Table 2-1, *Existing and Proposed Building Square Footages*, compares the square footages of the existing and proposed buildings at the project site.

Table 2-1 Existing and Proposed Building Square Footages

Existing Building	Existing Square Footage	Proposed Building	Proposed Square Footage	Net Change in Square Footage
Administration Building	7,120	Administration Building (Building A)	6,302	(818)
Classroom/Kitchen	3,782	Classroom 200 (Buildings B)	6,640	2,858
Old Schoolhouse	4,945	Old Schoolhouse (Library/Media Center – Building C)	4,945	(0)
Multipurpose room (MPR)/Classrooms	9,892	Multipurpose Room (MPR) (Building G)	15,617	5,725
Classrooms	2,981	Classroom 300 (Buildings B)	6,636	3,655
Classrooms	13,944	Classroom 400 (Buildings B)	6,632	(7,312)
N/A	N/A	Classroom 500 (Buildings B)	2,359	2,359
Media Center/Classrooms	5,314	Classroom 700 (Buildings B)	6,643	1,329
N/A	N/A	Classroom 800 (Buildings B)	7,793	7,793
Kindergarten Building	7,302	Classroom Building 600 (Building E)	12,049	4,747

2. PROJECT DESCRIPTION

Table 2-1 Existing and Proposed Building Square Footages

Existing Building	Existing Square Footage	Proposed Building	Proposed Square Footage	Net Change in Square Footage
Portable Classrooms	4,999	N/A – Existing Portables will be removed	N/A	(4,999)
Lunch Shelter	3,081	Lunch Courtyard	2,519	(562)
N/A	N/A	Flex 300 (Building F)	3,379	3,379
Total Square Footage	63,360	—	81,514	18,154

Administration and Classroom Buildings

The existing Administration Building, located in the northwestern portion of the site, is 7,120 square feet and would be reduced to 6,302 square feet upon project completion. The Multipurpose Room (MPR) Building would be relocated from the northeastern portion of the site to the western portion of the site, south of the Administration Building. The MPR Building square footage would increase from 9,892 square feet to 15,617 square feet.

The Classroom Buildings would remain in the northern and eastern portions of the site, and the square footages would increase from 38,322 square feet to 48,752 square feet (see Table 2-1). There would be outdoor collaboration spaces with seating adjacent to the classrooms. The Flex 300 Building would be a new building on campus and would be 3,379 square feet.

While the District does not intend on changing enrollment, student capacity, or the number of staff/teachers, the number of formal classrooms would decrease from 33 to 30 with a concentrated effort on creating more communal and flexible spaces for groups to share and move between. The proposed buildings would be one story and designed to be all-electric.

Old Schoolhouse Building

The Old Schoolhouse currently includes classrooms. Under the proposed project, the Old Schoolhouse would include a full structural retrofit with major interior upgrades and limited exterior upgrades and would be used as a library/media center. The Old Schoolhouse would be open during the normal school days and hours for school use as well as during school-sponsored events. One library technician would work at the library.

2. PROJECT DESCRIPTION

Amenities

The proposed project would include the following:

- A community plaza and teacher’s lounge in the northwestern corner of the site with built-in seating, signage, and pedestrian crosswalk to the existing tunnel
- An eight-foot-wide “Heritage” concrete walkway with informal seating and historic interpretive signage
- A gathering plaza east of the MPR Building
- An open wood structure (the Barn), learning garden, and citrus grove
- An outdoor lab for schoolwide plant experimentation south of the Old Schoolhouse
- A kinder play area in the southeast portion of the site
- A nature play area, 30,000-square-foot field with an eight-foot-wide track, and painted hardcourts in the southern portion of the site
- A vermiculture educational area and covered lunch courtyard south of the MPR Building

The District would replace the existing public address (PA) system, which is located throughout the project site inside and outside of buildings, with a new PA system in similar locations.

2.6.2 Circulation Improvements, Parking, and Access

Currently, the project site can be accessed via five driveways—one in the western portion of the site along North Vulcan Avenue, and four along Union Street at the northern portion of the site. There are three parking lots—two in the northern and northeastern portions of the site and one in the western portion of the site, which is also the drop-off/pick-up zone. Currently, there are 39 parking spaces on the project site.

Upon project completion, the three parking lots and the drop-off-pick/up zone would remain. There would be 50 to 60 parking spaces, and the parking lots would include electric vehicle charging spaces. There would be a total of three driveways—two along the western portion of the site off North Vulcan Avenue and one at the northeastern parking lot off Union Street. The western parking lot and drop-off-pick/up zone off North Vulcan Avenue would be expanded to extend much of the western boundary of the project site. The parking lot in the northeastern portion of the site would include a median in the center of the parking lot to improve the flow and circulation within the parking lot. New diagonal parking spaces would be constructed off Union Street.



Source: DLR Group 2025.

Figure 2-4
Conceptual Site Plan

2. PROJECT DESCRIPTION

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2. PROJECT DESCRIPTION

2.6.3 Temporary Farmers Market Relocation

During construction, the Leucadia Farmers Market would relocate to Oak Crest Middle School approximately two miles southeast. Upon project completion, the Leucadia Farmers Market would relocate back to the project site.

2.6.4 Temporary Student Relocation

Project construction would occur in one phase and is anticipated to start in June 2026 and to end in August 2027. During construction, the District would temporarily relocate approximately 265 students to Park Dale Lane Elementary School and 300 students El Camino Creek Elementary School in the District during the 2026–2027 school year. While busing is not currently available, the District would arrange bus transportation between an established area and the temporary campuses while construction is underway. Each bus would be able to accommodate approximately 60 to 70 students.

To accommodate the Paul Ecke Central Elementary School students during construction, 14 temporary portable classrooms would be installed at Park Dale Lane Elementary School, and four temporary portable classrooms would be installed at El Camino Creek Elementary School.

2.6.5 Off-Site Improvements

The proposed project would include the following off-site improvements to accommodate the project operations:

- Improvements to the driveway access at the northeastern parking lot
- Elimination of three curb cuts along Union Street
- New crosswalk and stop sign intersection at the drop-off/pick-up zone entry along North Vulcan Avenue (southwestern portion of the project site)
- Restriping of North Vulcan Street to accommodate a left-hand turn from the north into the project site's drop-off/pick-up zone
- New water line installation in Union Street
- Elimination of on-site gas line utility connection
- Improved pedestrian pathway from the El Portal Street crossing to the southwestern portion of the project site
- Removal of one existing curb cut along North Vulcan Street
- Repaving of North Vulcan Street and Union Street along the project site's frontage

2. PROJECT DESCRIPTION

2.7 ACTIONS REQUESTED

This DEIR examines the environmental impacts of the proposed project and also addresses various actions by the District and others to adopt and implement the proposed project. It is the intent of this DEIR to evaluate the environmental impacts of the proposed project, thereby enabling EUSD, other responsible agencies, and interested parties to make informed decisions with respect to the requested entitlements. The anticipated discretionary actions required for this project are listed in Table 2-2, *Actions Required*.

The District is the lead agency under CEQA and is carrying out the proposed project; to approve the proposed project, the EUSD Board of Education must first certify the Final EIR (FEIR). The Board would consider the information in the EIR when making its decision to approve or deny the proposed project, or in directing modifications to the proposed project in response to the EIR's findings and mitigation measures. The EIR is intended to disclose to the public the proposed project's details, analyses of the proposed project's potential environment impacts, and identification of feasible mitigation or alternatives that would lessen or reduce significant impacts to less-than-significant levels.

Table 2-2 Actions Required

Lead Agency	Action
Encinitas Union School District	▪ Certification of the EIR ▪ Adoption of the Findings and Statement of Overriding Considerations ▪ Adoption of the Mitigated Monitoring and Reporting Program (MMRP) ▪ Approval of the proposed project
Responsible Agencies	Action
Department of General Services, Division of State Architect (DSA)	▪ Review and approval of construction drawings and proposed project - o The District is potentially seeking state modernization funding and intends to submit plans to DSA by the end of 2025
California Coastal Commission	▪ Review and approval of the proposed project
State Water Resources Control Board	▪ Review of Notice of Intent to obtain permit coverage ▪ Issuance of General Permit for discharges of stormwater associated with construction activity ▪ Review of Storm Water Pollution Prevention Plan
San Diego Regional Water Quality Control Board	▪ Issuance of a National Pollution Discharge Elimination System Permit and Clean Water Act 401 Water Quality Certification
San Dieguito Water District	▪ Addition of new water, wastewater, and fire hydrant connections

2. PROJECT DESCRIPTION

2.7.1 Related Review and Consultation Requirements

In accordance with Public Resources Code Section 21080.1(d), a lead agency is required to provide formal notification of intended development projects to Native American tribes that have requested to be on the lead agency's list for receiving such notification. The formal notification is required to include a brief description of the proposed project and its location, lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation. The proposed project is subject to Public Resources Code Section 21080.1(d) and would provide formal notification of the proposed project to Native American tribes that have requested to be on the lead agency's list for receiving notification.

To date, the District has not received notification from any Native American tribes to be notified of District projects.

References

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2. PROJECT DESCRIPTION

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3. ENVIRONMENTAL ANALYSIS

This chapter of this Draft Environmental Impact Report (DEIR) examines the environmental setting of the proposed project, analyzes the effects of the proposed project and the significance of its impacts, and recommends mitigation measures to reduce or avoid impacts.

The proposed project is analyzed for potential significant impacts in accordance with Appendix F, Energy Conservation, and Appendix G, Environmental Checklist Form, of the California Environmental Quality Act (CEQA) Guidelines. This chapter has a separate section for each environmental topic as follows:

3.1	Aesthetics	3.6	Hazards and Hazardous Materials
3.2	Air Quality	3.7	Noise
3.3	Cultural and Paleontological Resources	3.8	Transportation
3.4	Energy	3.9	Tribal Cultural Resources
3.5	Greenhouse Gas Emissions		

ORGANIZATION OF ENVIRONMENTAL ANALYSIS

To assist the reader with comparing information between environmental issues, each section is organized under the same major headings.

- **Regulatory Framework** offers an overview of applicable laws, regulations, plans, and policies relevant to each environmental topic.
- **Existing Conditions** offers a description of the existing environmental conditions, providing a baseline against which the impacts of the proposed project can be compared.
- **Standards for Analysis** refer to the quantitative or qualitative standards, performance levels, thresholds, or criteria used to evaluate whether an impact is significant. These standards are based primarily on the CEQA Guidelines unless otherwise noted. This section also provides an overview of key methods, assumptions, and considerations that inform the impact analysis.
- **Project Impact Analysis** provides a detailed discussion of the potential direct and indirect impacts of the proposed project. Mitigation measures are included as necessary.

3. ENVIRONMENTAL ANALYSIS

- **Cumulative Impact Analysis** provides an overview of the geographic setting and cumulative projects considered in the cumulative impact assessment. Significant cumulative impacts are identified, and mitigation measures are included as necessary.
- **References** are provided for information sources used in the development of the discussion.

LEVELS OF SIGNIFICANCE

The level of significance is identified for each impact in this DEIR. Although the criteria for determining significance are different for each topic area, the environmental analysis applies the following uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

No Impact. The project would result in no adverse effect on the environment.

Less-than-Significant Impact. The project would not exceed the established significance criteria.

Significant Impact. The project would exceed the established significance criteria. For each significant impact, the EIR identifies mitigation measures to reduce, eliminate, or avoid the adverse effect. If one or more mitigation measures would reduce the impact to a less-than-significant level successfully, this is stated in the EIR.

Significant and Unavoidable Impact. The project would exceed the established significance criteria, and no feasible mitigation measures are available to reduce the impact to a less-than-significant level.

EVALUATION METHODOLOGY

Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the lead agency, based on substantial evidence in the record as a whole, including views held by members of the public. An ironclad definition of significant effect is not always possible because the significance of an activity may vary based on the setting. Pursuant to CEQA Guidelines Section 15064(b), the analysis in this DEIR is based on scientific and factual data that have been reviewed by the lead agency and represent the lead agency's independent judgment and conclusions.

Baseline

This EIR evaluates the impacts of the proposed project relative to existing conditions, as required by CEQA Guidelines Section 15126.2. Unless otherwise noted, the baseline represents the existing conditions on the ground (i.e., physical conditions) at the time that the Notice of Preparation was issued (October 22, 2025).

3. ENVIRONMENTAL ANALYSIS

Potential Effects of the Project on the Environment

The California Supreme Court concluded in *California Building Industry Association vs. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 that “CEQA generally does not require an analysis of how existing environmental conditions will impact a project’s future users or residents.” The *CBIA vs. BAAQMD* ruling provided for several exceptions to the general rule where an analysis of the project on the environment is warranted:

1. If the project would exacerbate existing environmental hazards (such as exposing hazardous waste that is currently buried).
2. If the project qualifies for certain specified exemptions (certain housing projects and transportation priority projects pursuant to Public Resources Code (PRC) Sections 21159.21 (f),(h); 21159.22 (a),(b)(3); 21159.23 (a)(2)(A); 21159.24 (a)(1),(3); or 21155.1 (a)(4),(6).
3. If the project is exposed to potential noise and safety impacts on projects due to proximity to an airport (pursuant to PRC sec. 21096).
4. School projects require specific assessment of certain environmental hazards (pursuant to PRC sec. 21151.8).

Therefore, the evaluation of the significance of project impacts under CEQA focuses on the potential impacts of the proposed project on the environment, including whether the proposed project may exacerbate any existing environmental hazards. Existing environmental hazards in the project area may include, but are not limited to, hazardous materials and rail lines. Therefore, while the effects of these hazards on the proposed project are generally not subject to CEQA review following the *CBIA vs. BAAQMD* case, a discussion of the project’s potential to exacerbate these hazardous conditions is provided in Section 3.6, *Hazards and Hazardous Materials*, of this DEIR.

CUMULATIVE IMPACTS

A cumulative impact consists of an impact created as a result of the combination of the project evaluated in the EIR, together with other reasonably foreseeable projects causing related impacts. CEQA Guidelines Section 15130 requires an EIR to discuss cumulative impacts of a project when the project’s incremental effect is “cumulatively considerable.” Cumulative effects could occur when future development under the project is combined with development in the surrounding area or, in some instances, in the entire region.

Pursuant to CEQA Guidelines Section 15130(a)(3), where a cumulative impact is significant when compared to baseline conditions, the analysis must address whether the project’s contribution to the significant cumulative impact is “considerable.” If the contribution of the

3. ENVIRONMENTAL ANALYSIS

project is considerable, then the EIR must identify potentially feasible measures that could avoid or reduce the magnitude of the project's contribution to a less-than-considerable level. If the project's contribution is not considerable, it is considered less than significant, and no mitigation for the project's contribution is required.

CEQA Guidelines Section 15130(b)(1) states that the information used in the analysis of cumulative impacts should come from one or two sources:

- A. A list of past, present, and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- B. A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

The cumulative impact analyses in this EIR use a combination of methods A and B. The cumulative discussions in Sections 3.1 through 3.9 explain the geographic scope of the area affected by each cumulative effect (e.g., immediate project vicinity, county, watershed, air basin), which depends on the environmental topic being analyzed. For example, in assessing macroscale air quality impacts, all development in the air basin contributes to regional emissions of criteria pollutants, and basinwide projections of emissions are the best tool for determining the cumulative impact. In assessing aesthetic impacts, however, only development in the local area of change would contribute to a cumulative visual effect because the area of change is only visible near that area.

3.1 AESTHETICS

This section of the Draft Environmental Impact Report (DEIR) evaluates the Paul Ecke Central Elementary School Rebuild Project's (proposed project) potential impacts on aesthetic and visual resources related to visual character, visual quality, and new sources of light and glare. The analysis in this section is based in part on the existing conditions of the project site.

3.1.1 Regulatory Framework

State and local laws, regulations, plans, or guidelines related to aesthetics that are applicable to the proposed project are summarized in this section.

STATE

California Building Code: Building Energy Efficiency Standards

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in June 1977 and most recently revised in 2018 (Title 24, Part 6, of the California Code of Regulations). The newly revised standards took effect on January 1, 2020. Title 24 requires the design of building shells and building components to conserve energy. It also requires outdoor lighting controls to reduce energy usage; in effect, this reduces outdoor lighting.

California Scenic Highway Program

The California legislature created the Scenic Highway Program to protect scenic highway corridors from changes that could diminish the aesthetic value of lands adjacent to the highways. The state regulations and guidelines governing the Scenic Highway Program are found in the Streets and Highways Code, Section 260. A highway is designated under this program when a local jurisdiction adopts a scenic corridor protection program, applies to the California Department of Transportation (Caltrans) for scenic highway approval, and receives notification from Caltrans that the highway has been designated as a scenic highway. Interstates, state highways, byways, and parkways are eligible for designation or for recognition as eligible for designation. California Streets and Highways Code Section 263 gives the state legislature the authority to identify highways as eligible for designation as a scenic highway. State scenic highways in California are either formally recognized by Caltrans or meet the criteria outlined in the Streets and Highway Code, Section 260, of the California Scenic Highway Program.

3.1 AESTHETICS

LOCAL

City of Encinitas Code of Ordinances

Chapter 30.40 Performance Standards

Section I, Chapter 3-40 of the City of Encinitas' (City's) Code of Ordinances outlines residential and commercial lighting standards which include the following:

- All light sources shall be shielded in such a manner that the light is directed away from streets or adjoining properties.
- All residential zones and commercial uses adjoining residential uses shall not have a measured sustained light standard in excess of one-half foot-candle at the property line. Outdoor lighting fixtures shall be fully shielded. The light source shall not be directly visible from any adjoining residential property. The shielding requirement shall not apply to decorative landscape lighting fixtures of 50 watts or less, holiday lighting, fossil fuel lighting, or lighting within front yard areas intended to illuminate pedestrian and vehicular entries, landscaping/architectural accents, and the like.
- All interior commercial lots shall not have a measured sustained light standard in excess of one foot-candle at the property line.

Chapter 23.08 Design Review

This chapter of the City's Code of Ordinances determines compliance of projects with the City's design standards and assures a high degree of aesthetic and functional value in the physical development of the City, while encouraging the preservation of individual and community character.

Design Guidelines

The City Design Standards and Guidelines (amended January 2022) is intended to guide development in the City toward design that is consistent with the character of each community (Encinitas 2022). These Design Standards and Guidelines describe the preferred architectural character and development patterns within the City.

North 101 Corridor Specific Plan

The project site is within the North 101 Corridor Specific Plan and therefore would be subject to the policies, procedures, and recommendations outlined within the plan which include the following.

Article 4: Design Recommendations

The design recommendations in Article 4 are intended to inform and guide property development and redevelopment in the North 101 Corridor Specific Plan area. The design recommendations are not regulatory, but rather discretionary. All new building, landscaping, exterior alterations, signage or construction projects, whether they require any other City permit or not, are subject to design review unless exempted by Section 4.3, Exemptions from Design Review, of the City's Code of Ordinances.

Section 4.6.3 Security Considerations

As part of design recommendations in Article 4, lighting for pedestrian walkways should be maintained at 0.5 foot-candles for areas such as through common areas, and at 0.8 foot-candles for security areas such as at site entrances and walkways from parking areas.

Encinitas General Plan

The Encinitas General Plan provides the basis for the City's policies and represents the community's basic values, ideals, and aspirations. The General Plan establishes policies to guide development and conservation. Resource Management Element of the City of Encinitas General Plan includes the following policies related to aesthetics (Encinitas 2011):

- **Policy 3.6.** Future development shall maintain significant mature trees to the extent possible and incorporate them into the design of development projects.
- **Policy 4.2.** The following Vista Points will be developed and maintained as feasible:
 - Orpheus Street Park site
 - Oak Crest Park site
 - West end of "D" Street
 - West end of "F" Street
 - West end of "J" Street
- **Policy 4.3.** The following Vista Points will be maintained as needed, and upgraded as necessary:
 - Leucadia Beach State Park
 - West end of "I" Street
 - Moonlight State Beach
 - Swami's City Park
 - Existing Vista Point on southbound I-5
 - Cardiff Beach State Park (south parking lot)
- **Policy 4.4.** The system of Vista Points will provide for the differing needs of automobile, bicycle, and pedestrian users, and will recognize as a recreational resource, the function of

3.1 AESTHETICS

Vista Points as facilities for the passive, and occasionally remote enjoyment of the coastal and inland view.

- **Policy 4.6.** The City will maintain and enhance the scenic highway/visual corridor viewsheds.
- **Policy 4.8.** The City will designate Scenic/Visual Corridor Overlay and scenic highway viewshed areas as illustrated on the Visual Resource Sensitivity Map (Figure 3).

Scenic/Visual Corridor Overlay

The City's Scenic Visual Overlay Zone Mapper identifies scenic/visual corridors in the City; the overlay protects the integrity of vista points and ensures views are not compromised (Encinitas 2011).

Resource Management Plan

Preservation of Scenic Visual Resources

The Preservation of Scenic Visual Resources section of the Resource Management Plan in the Resource Management Element indicates that various elements of the General Plan aim to preserve scenic and visual resources, including maintenance of vista points and promoting urban design that is sensitive to significant viewsheds (Encinitas 2011).

3.1.2 Existing Conditions

An aerial photograph of the project site is shown on Figure 2-3, *Aerial Photograph*, which shows the existing uses on the project site. The project site is surrounded by residential uses to the north and south, Orpheus Park and the residential uses to the east, and the commercial uses to the west.

SCENIC VISTAS AND CORRIDORS

The nearest officially designated state scenic highway to the project site is a section of State Route (SR) 52 within the City of San Diego, approximately 19.20 miles southeast of the project site (Caltrans 2025). The nearest eligible state scenic highway to the project site is Interstate (I) 5 approximately 0.33 mile east of the project site.

The Encinitas General Plan identified various scenic vistas and corridors. The project site is not within the Scenic/Visual Corridor Overlay Zone (Encinitas 2025a). The closest local scenic highway/visual corridor is I-5. Of the City-designated vista points identified in General Plan, Orpheus Park, bounding the eastern portion of the site, is the closest vista point to the project site.

VISUAL CHARACTER

The project site is in an urbanized area in the western portion of Encinitas. The northern portion of the project site is bounded by Union Street and residential uses across Union Street, and the western portion of the project site is bound by Vulcan Avenue with railroad tracks and commercial uses across the street. The southern portion of the project site is bounded by Halcyon Road and residential uses, and the project site is bounded by Orpheus Park (recreational uses) and residential uses to the east of the project site.

The vegetation on the project site consists of ornamental trees and low-laying grasses/ground cover. The project site is fully developed with academic uses.

VISUAL RESOURCES

The project site is fully developed with permanent and portable buildings, asphalt walkways, hardcourts, a garden, parking lots, and fields. There are no visual resources on the project site. The Encinitas General Plan does not identify specific visual or scenic resources within the project site; however, Orpheus Park is a vista point. Moonlight State Beach, approximately 0.61 mile southwest of the project site, and Leucadia Beach State Park, approximately 0.63 mile northwest of the project site, are also vista points.

LANDFORM

The project site is predominantly flat and gradually slopes from east to west, with elevations ranging from approximately 85 feet to 65 feet above mean sea level. No significant landforms are within the vicinity of the project site or visible from the project site.

Significant landforms in the City include the San Elijo Lagoon, the Batiquitos Lagoon, and coastal bluffs. The closest landform is the Batiquitos Lagoon approximately 1.9 miles north of the project site.

LIGHT AND GLARE

The two major causes of light pollution on the project site are spill light and glare from existing sources of light. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against (or reflects off) a dark background or shiny surface. Existing sources of light and glare at the project site include light emanating from building interiors, building and security lights, and parking lot lights, as well as light-colored building materials, glazing, and windows. Off-site sources of light include street lighting, vehicular lighting, and exterior lighting on existing residential uses.

3.1 AESTHETICS

3.1.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, Environmental Checklist Form, of the California Environmental Quality Act (CEQA) Guidelines states that, “except as provided in Public Resources Code Section 21099,” the proposed project would result in a significant aesthetic impact if it would:

- a) Have a substantial adverse effect on a scenic vista.
- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- c) 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.) In an urbanized area, if the project would conflict with applicable zoning and other regulations governing scenic quality.
- d) Expose people on- or off-site to substantial light or glare, which would adversely affect day or nighttime views in the area.

3.1.4 Project Impact Analysis

a)	Would the project have a substantial adverse effect on a scenic vista?
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Orpheus Park, which bounds the eastern portion of the project site and is identified as a vista point by General Plan Policy 4.2, is the closest vista to the project site to the east. However, the trees and landscaping on the western portion of Orpheus Park partially block views of the project site. The project site is visible from the stairs/walkway that leads from the top to the bottom of Orpheus Park. Because Orpheus Park is at a higher elevation than the project site (approximately 120 feet above mean sea level), views of the distant coastal area and panoramic views would still be visible from Orpheus Park. Given the topography, distance, and intervening landscaping and buildings, views of the Pacific Ocean are not visible from the streets surrounding the project site. Overall, the proposed project would not obstruct views from Orpheus Park, given the elevation difference, nor would it obstruct views from the surrounding streets as no scenic vistas are visible due to the surrounding infrastructure and distance. Future development on the project site would be similar in height to existing buildings; the proposed project would not include two-story buildings. Overall, implementation of the proposed project

3.1 AESTHETICS

would not result in a substantial adverse effect on a scenic vista. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less-than-significant impact.

b)	Would the project substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings?
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The California Scenic Highway Program seeks to preserve and protect areas of outstanding natural beauty that are visible from state highways. The project site is not within or near a Scenic Highway designated by the Caltrans.

The nearest officially designated state scenic highway to the project site is a section of SR-52 approximately 19.20 miles southeast of the project site (Caltrans 2025). Additionally, the project site is not within the City's Scenic/Visual Corridor Overlay Zone and would not impact views of local landforms (Encinitas 2025a). The nearest eligible state scenic highway to the project site is I-5, approximately 0.33 mile east of the project site. Due to the distance, topography, and intervening development, the project site is not visible from a designated or eligible state scenic highway. The proposed project would not damage scenic resources within a state scenic highway. Therefore, **no impact** would occur.

Significance without Mitigation: No impact.

c)	In nonurbanized areas, would the project 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?
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As defined by Public Resources Code Section 21071, an "urbanized area" is a city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons. The City has an estimated population of 61,956 people and is contiguous with the cities of Carlsbad and Solana Beach, which have an estimated population of 116,368 and 12,986, respectively (DOF 2025). Therefore, the project site is considered to be within an urbanized area.

The project site is zoned Public/Semi-Public (N-P/SP) (Encinitas 2025b). The proposed project would rebuild the existing Paul Ecke Central Elementary School campus and remain consistent with the existing zoning designation. As the project site is already developed with school uses,

3.1 AESTHETICS

and the rebuild would result in similar building heights and uses as the existing campus, the proposed project would not interfere with public views and would not conflict with applicable zoning or regulations governing scenic quality. As the project area is urbanized with development and other infrastructure and landscaping, the proposed project would not degrade the visual character or quality of public views. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less-than-significant impact.

d)	Would the project expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area?
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The project site's existing sources of light and glare include light emanating from building interiors, building and security lights, and parking lot lights, as well as light-colored building materials, glazing, and windows. Off-site sources of light include street lighting, vehicular lighting, and exterior lighting on existing residential uses.

The proposed project would rebuild the Paul Ecke Central Elementary School campus, which would result in more light and glare to the project site and surrounding area because the overall square footage of the buildings onsite would increase. Additionally, sources of glare would include vehicles, light-colored building material, glazing, and windows.

However, the proposed project would not introduce new sources or types of light and glare to the project site. As with existing conditions, the proposed project would also include light emanating from building interiors, building and security lights, parking lot lights, light-colored building materials, glazing, and windows.

The proposed project would adhere to local policies such as directing light away from adjoining properties and fully shielding outdoor light, per Chapter 30.40, Performance Standards, of the City's Code of Ordinances. Existing and proposed buildings, landscaping and vegetation, and fences on the project site and in the project area would further block light and glare from the project site. The proposed project would not result in an increase in vehicle trips compared to existing conditions, and therefore, the proposed project would not generate a new substantial source of light and glare within project area roadways. Therefore, the proposed project would not substantially increase new sources of light and glare and would not significantly impact day or nighttime views with adherence to local policies. Therefore, the proposed project would have a **less-than-significant impact**.

Significance without Mitigation: Less-than-significant impact.

3.1.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to aesthetics?

Development of the proposed project and related projects have the potential to result in aesthetic impacts and generate light spill. However, similar to the proposed project, each related project would be expected to prepare a site-specific analysis of impacts, implement mitigation measures if needed, and comply with applicable regulations. The proposed project would not result in significant impacts related to aesthetics. Therefore, the proposed project's contribution to cumulative aesthetic impacts would be less than cumulatively considerable, and the proposed project's impacts would be less than significant.

Significance with Mitigation: Less-than-significant impact.

3.1.6 References

California Department of Transportation (Caltrans). 2025, September 12 (accessed). California State Scenic Highways.

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3.1 AESTHETICS

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3.2 AIR QUALITY

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for the Paul Ecke Central Elementary School Rebuild Project (proposed project) to impact air quality in a local and regional context. This evaluation is based on the methodology recommended by the San Diego Air Pollution Control District (SDAPCD) and the County of San Diego. The analysis focuses on air pollution from regional emissions and localized pollutant concentrations. Criteria air pollutant emissions modeling for the proposed project and health risk assessment (HRA) are included in Appendix 3.2-1, *Air Quality and Greenhouse Gas Emissions Modeling*, and Appendix 3.2-2, *Health Risk Assessment*, of this DEIR.

Criteria Air Pollutants

The pollutants emitted into the ambient air by stationary and mobile sources are categorized as primary and/or secondary pollutants. Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_x), sulfur dioxide (SO₂), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), and lead (Pb) are primary air pollutants. Of these, CO, SO₂, nitrogen dioxide (NO₂), PM₁₀, and PM_{2.5} are “criteria air pollutants,” which means that ambient air quality standards (AAQS) have been established for them. VOC and NO_x are criteria pollutant precursors that form secondary criteria air pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O₃) and NO₂ are the principal secondary pollutants.

Each of the primary and secondary criteria air pollutants and its known health effects are described as follows.

Carbon Monoxide (CO) is a colorless, odorless gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is a primary criteria air pollutant. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. The highest ambient CO concentrations are generally found near traffic-congested corridors and intersections. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation (EPA 2025a).

Volatile Organic Compounds (VOC) are compounds composed primarily of atoms of hydrogen and carbon. Internal combustion associated with motor vehicle usage is the major source of VOCs. Other sources of VOCs include evaporative emissions associated with the use of paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. There are no **AAQSs** established for VOCs (EPA 2025b).

Nitrogen Oxides (NO_x) are a by-product of fuel combustion and contribute to the formation of ground-level O₃, PM₁₀, and PM_{2.5}. The two major forms of NO_x are nitric oxide (NO) and NO₂.

3.2 AIR QUALITY

NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. The principal form of NO₂ produced by combustion is NO, but NO reacts with oxygen quickly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO₂ acts as an acute irritant and is more injurious than NO in equal concentrations. At atmospheric concentrations, however, NO₂ is only potentially irritating. NO₂ absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. NO₂ exposure concentrations near roadways are of particular concern for susceptible individuals, including people with asthma, children, and the elderly. Current scientific evidence links short-term NO₂ exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects, including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. Also, studies show a connection between breathing elevated short-term NO₂ concentrations and increased visits to emergency departments and hospital admissions for respiratory issues, especially asthma (EPA 2025c).

Sulfur Dioxide (SO₂) is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It enters the atmosphere as a result of burning high-sulfur-content fuel oils and coal and from chemical processes at chemical plants and refineries. Gasoline and natural gas have very low sulfur content and do not release significant quantities of SO₂. When sulfur dioxide forms sulfates (SO₄) in the atmosphere, together these pollutants are referred to as sulfur oxides (SO_x). Thus, SO₂ is both a primary and secondary criteria air pollutant. At sufficiently high concentrations, SO₂ may irritate the upper respiratory tract. Current scientific evidence links short-term exposures to SO₂, ranging from 5 minutes to 24 hours, with an array of adverse respiratory effects including bronchoconstriction and increased asthma symptoms. These effects are particularly important for asthmatics at elevated ventilation rates (e.g., while exercising or playing). At lower concentrations and when combined with particulates, SO₂ may do greater harm by injuring lung tissue. Studies also show a connection between short-term exposure and increased visits to emergency departments and hospital admissions for respiratory illnesses, particularly in at-risk populations, including children, the elderly, and asthmatics (EPA 2025d).

Suspended Particulate Matter (PM₁₀ and PM_{2.5}) consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized and regulated. Inhalable coarse particles, or PM₁₀, include particulate matter with an aerodynamic diameter of 10 microns (i.e., 10 millionths of a meter or 0.0004 inch) or less. Inhalable fine particles, or PM_{2.5}, have an aerodynamic diameter of 2.5 microns (i.e., 2.5 millionths of a meter or 0.0001 inch) or less. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. Both PM₁₀ and PM_{2.5} may adversely affect the human respiratory system, especially in people who are naturally sensitive or susceptible to breathing problems. The Environmental Protection Agency (EPA) scientific review concluded that PM_{2.5}, which penetrates deeply into the lungs, is more likely than PM₁₀ to contribute to health effects and at concentrations that extend well below those allowed by the current PM₁₀ standards. These health effects include premature death in people with heart or

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lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms (e.g., irritation of the airways, coughing, or difficulty breathing).

Diesel particulate matter (DPM) is classified by the California Air Resources Board (CARB) as a carcinogen. Particulate matter can also cause environmental effects such as visibility impairment (i.e., haze), environmental damage (e.g., damaging sensitive forests and farm crops, affecting diversity of ecosystems), and aesthetic damage (e.g., stain and damage stone and other materials) (EPA 2025e).

Ozone (O₃) is commonly referred to as “smog” and is a gas that is formed when VOCs and NO_x, both by-products of internal combustion engine exhaust, undergo photochemical reactions in the presence of sunlight. O₃ is a secondary criteria air pollutant. O₃ concentrations are generally highest during the summer months when direct sunlight, light winds, and warm temperatures create favorable conditions for its formation. O₃ poses a health threat to those who already suffer from respiratory diseases as well as to healthy people. Breathing O₃ can trigger a variety of health problems, including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level O₃ can also reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. O₃ also affects sensitive vegetation and ecosystems, including forests, parks, wildlife refuges, and wilderness areas. In particular, O₃ harms sensitive vegetation, including forest trees and plants during the growing season (EPA 2025f).

Lead (Pb) is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been mobile and industrial sources. As a result of the EPA’s regulatory efforts to remove lead from on-road motor vehicle gasoline, emissions of lead from the transportation sector dramatically declined by 95 percent between 1980 and 1999, and levels of lead in the air decreased by 94 percent between 1980 and 1999. Today, the highest levels of lead in air are usually found near lead smelters. The major sources of lead emissions to the air today are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Once taken into the body, lead distributes throughout the body in the blood and is accumulated in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. Lead exposure also affects the oxygen-carrying capacity of the blood. The lead effects most common in current populations are neurological effects in children and cardiovascular effects (e.g., high blood pressure and heart disease) in adults. Infants and young children are especially sensitive to lead even at low levels, which may contribute to behavioral problems, learning deficits, and lowered IQ (EPA 2025g).

Table 3.2-1, *Criteria Air Pollutant Health Effects Summary*, summarizes the potential health effects associated with the criteria air pollutants.

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Table 3.2-1 Criteria Air Pollutant Health Effects Summary

Pollutant	Health Effects	Examples of Sources
Carbon Monoxide (CO)	▪ Chest pain in heart patients ▪ Headaches, nausea ▪ Reduced mental alertness ▪ Death at very high levels	Any source that burns fuel such as cars, trucks, construction and farming equipment, and residential heaters and stoves
Ozone (O ₃)	▪ Cough, chest tightness ▪ Difficulty taking a deep breath ▪ Worsened asthma symptoms ▪ Lung inflammation	Atmospheric reaction of organic gases with nitrogen oxides in sunlight
Nitrogen Dioxide (NO ₂)	▪ Increased response to allergens ▪ Aggravation of respiratory illness	Same as carbon monoxide sources
Particulate Matter (PM ₁₀ and PM _{2.5})	▪ Hospitalizations for worsened heart diseases ▪ Emergency room visits for asthma ▪ Premature death	Cars and trucks (particularly diesel); fireplaces and woodstoves; and windblown dust from overlays, agriculture, and construction
Sulfur Dioxide (SO ₂)	▪ Aggravation of respiratory disease (e.g., asthma and emphysema) ▪ Reduced lung function	Combustion of sulfur-containing fossil fuels, smelting of sulfur-bearing metal ores, and industrial processes
Lead (Pb)	▪ Behavioral and learning disabilities in children ▪ Nervous system impairment	Contaminated soil

Source: CARB 2025c.

Toxic Air Contaminants

CARB has identified other air pollutants as toxic air contaminants (TACs), which are pollutants that may cause serious, long-term effects. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (US EPA 2025a). By the last update to the TAC list in December 1999, CARB had designated 244 compounds as TACs (CARB 1999). Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. There are no air quality standards for TACs. Instead, TAC impacts are evaluated by calculating the health risks associated with a given exposure. The majority of the estimated

health risks from TACs can be attributed to relatively few compounds, the most relevant to the proposed project being particulate matter from diesel-fueled engines.

DIESEL PARTICULATE MATTER

In 1998, CARB identified particulate emissions from diesel-fueled engines (diesel PM) as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particles are ten microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

CARB has promulgated the following specific rules to limit TAC emissions:

- **13 CCR Chapter 10, Section 2485**, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- **13 CCR Chapter 10, Section 2480**, Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools
- **13 CCR Section 2477** and Article 8, Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate

AAQs have been adopted at the state and federal levels for criteria air pollutants. In addition, both the state and federal government regulate the release of TACs. The proposed project is in the San Diego Air Basin (SDAB) and is subject to the rules and regulations imposed by the SDAPCD, the California AAQS adopted by CARB, and National AAQS adopted by the United States EPA. Federal, state, regional, and local laws, regulations, plans, or guidelines that are potentially applicable to the proposed project are summarized in this section.

3.2.1 Regulatory Framework

FEDERAL AND STATE

Ambient Air Quality Standards

The Clean Air Act (CAA) was passed in 1963 by the US Congress and has been amended several times. The 1970 CAA amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for areas not meeting National AAQS as well as the Prevention of Significant Deterioration program. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States. The CAA allows states to adopt more stringent standards or to include other pollution types.

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The California CAA, signed into law in 1988, requires all areas of the state to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tends to be more restrictive than the national AAQS.

The National and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect “sensitive receptors” most susceptible to further respiratory distress, including asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Both California and the federal government have established health-based AAQS for seven air pollutants, which are shown in Table 3.2-2, *Ambient Air Quality Standards for Criteria Air Pollutants*. These pollutants are O₃, NO₂, CO, SO₂, PM₁₀, PM_{2.5}, and Pb. In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

Table 3.2-2 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard¹	Federal Primary Standard²	Major Pollutant Sources
Ozone (O ₃) ³	1 hour	0.09 ppm	*	Major sources include motor vehicles, paints, coatings, and solvents.
	8 hours	0.070 ppm	0.070 ppm	
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Major sources include internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm	
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm	0.053 ppm	Major sources include motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.18 ppm	0.100 ppm	

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Table 3.2-2 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard¹	Federal Primary Standard²	Major Pollutant Sources
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	*	0.030 ppm	Major sources include fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	0.075 ppm	
	24 hours	0.04 ppm	0.14 ppm	
Respirable Coarse Particulate Matter (PM ₁₀)	Annual Arithmetic Mean	20 µg/m ³	*	Major sources include dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	50 µg/m ³	150 µg/m ³	
Respirable Fine Particulate Matter (PM _{2.5}) ^{4,6}	Annual Arithmetic Mean	12 µg/m ³	9 µg/m ³	Major sources include dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	*	35 µg/m ³	
Lead (Pb)	30-Day Average	1.5 µg/m ³	*	Major present sources include lead smelters, battery manufacturing and recycling facilities. Major past source includes combustion of leaded gasoline.
	Calendar Quarter	*	1.5 µg/m ³	
	Rolling 3-Month Average	*	0.15 µg/m ³	
Sulfates (SO ₄) ⁵	24 hours	25 µg/m ³	*	Major sources include industrial processes.

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Table 3.2-2 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard¹	Federal Primary Standard²	Major Pollutant Sources
Visibility-Reducing Particles	8 hours	ExCo =0.23/km visibility of 10≥ miles	No Federal Standard	Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size, and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt.
Hydrogen Sulfide	1 hour	0.03 ppm	No Federal Standard	Hydrogen sulfide (H ₂ S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation.
Vinyl Chloride	24 hours	0.01 ppm	No Federal Standard	Vinyl chloride (chloroethene), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.

Source: CARB 2024.

Notes: ppm: parts per million; µg/m³: micrograms per cubic meter

* Standard has not been established for this pollutant/duration by this entity.

1. California standards for O₃, CO (except 8-hour Lake Tahoe), SO₂ (1 and 24 hour), NO₂, and particulate matter (PM₁₀, PM_{2.5}, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than O₃, PM, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The O₃ standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration

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above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

3. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
4. On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
5. On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. The 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
6. On February 7, 2024, the national annual PM_{2.5} standard was lowered from 12 µg/m³ to 9 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary), secondary annual PM_{2.5} standard, and PM₁₀ standards (primary and secondary) were retained

California has also adopted a host of other regulations that reduce criteria pollutant emissions:

- **Assembly Bill (AB) 1493: Pavley Fuel Efficiency Standards.** Pavley I is a clean-car standard that reduces greenhouse gas emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016. In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025.
- **Title 20 of California Code of Regulations (CCR): Appliance Energy Efficiency Standards.** The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601–1608) were adopted by the California Energy Commission on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances.
- **24 CCR, Part 6: Building and Energy Efficiency Standards.** Energy conservation standards for new residential and nonresidential buildings adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in June 1977.
- **24 CCR, Part 11: Green Building Standards Code.** Establishes planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.¹

¹ The green building standards became mandatory in the 2010 edition of the code.

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California Air Resources Board

CARB is a part of the California Environmental Protection Agency and responsible for the coordination and administration of both federal and state air pollution control programs in California. In this capacity, CARB conducts research, sets the California AAQS (Table 3.2-2), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (e.g., hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan (SIP), working closely with the federal government and the local air districts. The SIP is required for the state to take over implementation of the federal CAA from the EPA.

Nuisance Regulations

Health and Safety Code Section 41700 states,

... a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property.

This section also applies to objectionable odors.

Tanner Air Toxics Act and Air Toxics Hot Spot Information and Assessment Act

Public exposure to TACs is a significant environmental health issue in California. In 1983, the California legislature enacted a program to identify the health effects of TACs and reduce exposure to them. The California Health and Safety Code defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health" (17 CCR Section 93000). A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal CAA (42 US Code Section 7412[b]) is a TAC. Under state law, the California Environmental Protection Agency, acting through CARB, is authorized to identify a substance as a TAC if it is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through AB 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). The Tanner Air Toxics Act set up a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an "airborne toxics control measure" for sources that emit that TAC. If there is a safe

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threshold for a substance (i.e., a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate “toxics best available control technology” to minimize emissions. To date, CARB has established formal control measures for 11 TACs that are identified as having no safe threshold.

Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High-priority facilities are required to perform an HRA, and if specific thresholds are exceeded, are required to communicate the results to the public through notices and public meetings.

CARB has promulgated the following specific rules to limit TAC emissions:

13 CCR Chapter 10 Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. This regulation generally restricts on-road diesel-powered commercial motor vehicles with a gross vehicle weight rating of greater than 10,000 pounds from idling more than five minutes.

- **13 CCR Chapter 10 Section 2480: Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools.** Generally, restricts a school bus or transit bus from idling for more than five minutes when within 100 feet of a school.
- **13 CCR Section 2477 and Article 8: Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate.** Regulations established to control emissions associated with diesel-powered TRUs.

REGIONAL

San Diego Air Pollution Control District

Local air quality management districts and air pollution control districts are responsible for enforcing standards and regulating stationary sources. The project site is located within the SDAB and is subject to the guidelines and regulations of the SDAPCD. The following rules and regulations apply to all sources in the jurisdiction of the SDAPCD:

Regulation IV: Prohibitions; Rule 50: Visible Emissions. This regulation prohibits any activity causing air contaminant emissions darker than 20 percent opacity for more than an aggregate of 3 minutes in any consecutive 60-minute time period. In addition, Rule 50 prohibits any diesel piledriving hammer activity causing air contaminant emissions for a period or periods aggregating more than four minutes during the driving of a single pile (SDAPCD 1997).

Regulation IV: Prohibitions; Rule 51: Nuisance. This regulation prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a

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tendency to cause injury, detriment, nuisance, or annoyance to people and/or the public, or damage to any business or property (SDAPCD 1976).

Regulation IV: Prohibitions; Rule 55: Fugitive Dust Control. This regulation ensures fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site (SDAPCD 2009).

Regulation IV: Prohibitions; Rule 67.0.1: Architectural Coatings. This regulation requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SDAPCD 2021).

San Diego County Regional Air Quality Strategy

SDAPCD and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the AAQs in the SDAB. The Regional Air Quality Strategy (RAQS) for the SDAB was initially adopted in 1991 and is updated every three years. The RAQS outlines SDAPCD's plans and control measures designed to attain the California AAQS for O₃. The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County and the cities in the County, to forecast future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. The CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans (SANDAG 2021).

On March 9, 2023, SDAPCD adopted the 2022 RAQS. The RAQS plan demonstrates how the San Diego region will further reduce air pollution emissions to meet state health-based standards for ground-level O₃. The 2022 RAQS guides the SDAPCD in deploying tools, strategies, and resources to continue reducing pollutants that are precursors to ground-level O₃, including NO_x and VOC. The 2022 RAQS emphasizes O₃ control measures but also identifies complementary measures and strategies that can reduce emissions of GHGs and particulate matter. It also includes new analyses exploring O₃ and its relationship to public health, mobile sources, under-resourced communities, and GHGs and climate change. Further, the 2022 RAQS identifies strategies to expand SDAPCD regional partnerships, identify more opportunities to engage the public and communities of concern, and integrate environmental justice and equity across all proposed measures and strategies (SDAPCD 2022).

3.2.2 Existing Conditions

The project site is located within the SDAB and is subject to the SDAPCD guidelines and regulations. The SDAB is one of 15 air basins that geographically divide the State of California. The SDAB is currently classified as a federal nonattainment area for O₃ and a state nonattainment area for PM₁₀, PM_{2.5}, and O₃.

CLIMATE AND METEOROLOGY

Climate in Southern California, including the SDAB, is controlled largely by the strength and position of subtropical high-pressure cells over the Pacific Ocean. Most precipitation is limited to a few storms during the winter season. Winds in the vicinity of the project site are usually driven by the dominant land/sea breeze circulation system. Temperature inversions, which can trap air pollutants near the ground, are common during the summer months when daytime winds are light. Wind patterns can also concentrate and carry pollutants from nearby areas, most notably Los Angeles, thereby adding to the local pollutant mix.

The average maximum daily summertime and wintertime temperatures in the City of Encinitas are in the mid-70s and 60s, respectively. The average minimum daily summertime and wintertime temperatures in the City are in the mid-60s and high 40s, respectively. Annual precipitation ranges from approximately 10 inches at the coast to approximately 13 inches in inland areas of the City. Precipitation occurs mostly during the winter months; it is relatively infrequent during the summer (WeatherSpark 2025).

The SDAB experiences frequent temperature inversions. Subsidence inversions occur during the warmer months as descending air associated with the Pacific High-Pressure Zone meets cool marine air. The boundary between the two layers of air creates a temperature inversion that traps pollutants. The other type of inversion, a radiation inversion, develops on winter nights when air near the ground cools by heat radiation and air aloft remains warm. The shallow inversion layer formed between these two air masses also can trap pollutants. As the pollutants become more concentrated in the atmosphere, photochemical reactions occur that produce O₃, which contributes to the formation of smog. Smog is a combination of smoke and other particulates, O₃, hydrocarbons, NO_x, and other chemically reactive compounds, which, under certain conditions of weather and sunlight, may result in a murky brown haze that causes adverse health effects.

REGIONAL ATTAINMENT STATUS

The RAQS provides the framework for air quality basins to achieve attainment of state and federal AAQs through the State Implementation Plan (SIP). Areas are classified as attainment or nonattainment areas for particular pollutants depending on whether they meet the AAQs.

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Severity classifications for ozone nonattainment range in magnitude from marginal, moderate, and serious to severe and extreme.

- **Unclassified.** A pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.
- **Attainment.** A pollutant is in attainment if the AAQS for that pollutant was not violated at any site in the area during a three-year period.
- **Nonattainment.** A pollutant is in nonattainment if there was at least one violation of an AAQS for that pollutant in the area.

Nonattainment/Transitional. This is a subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the AAQS for that pollutant.

The attainment status for the Southern California Air Basin is shown in Table 3.2-3, *Attainment Status of Criteria Air Pollutants in the San Diego Air Basin*.

Table 3.2-3 Attainment Status of Criteria Pollutants in the San Diego Air Basin

Pollutant	State	Federal
Ozone – 8-hour	Nonattainment	Nonattainment
Ozone – 1-hour	Nonattainment	Attainment ¹
CO	Attainment	Attainment
PM ₁₀	Nonattainment	Unclassifiable ²
PM _{2.5}	Nonattainment ³	Attainment
NO ₂	Attainment	Attainment
SO ₂	Attainment	Attainment
Lead	Attainment	Attainment
All others	Attainment/Unclassified	No Federal Standard

Source: SDAPCD 2025a.

1. The federal 1-hour standard of 12 parts per hundred million (pphm) was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.
2. At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.
3. The California Air Resources Board (CARB) has not reclassified the region to attainment yet due to (1) incomplete data, and (2) the use of non-California Approved Samplers (CAS). While data collected does meet the requirements for designation of attainment with federal PM_{2.5} standards, the data completeness requirements for state PM_{2.5} standards substantially exceed federal requirements and mandates, and have historically not been feasible for most air districts to adhere to given local resources. SDAPCD has begun replacing most regional filter-based PM_{2.5} monitors as they reach the end of their useful life with continuous PM_{2.5} air monitors to ensure collected data meets stringent completeness requirements in the future. SDAPCD anticipates these new monitors will be approved as "CAS" monitors once CARB review the list of approved monitors, which has not been updated since 2013.

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EXISTING AMBIENT AIR QUALITY

Existing levels of ambient air quality and historical trends and projections in the vicinity of the project site are best documented by measurements taken by SDAPCD. The SDAPCD air quality monitoring station closest to the project site is the Chula Vista Monitoring Station, which monitors O₃, NO₂, and PM_{2.5}. Data for PM₁₀ is supplemented from the San Diego-Kearny Villa Road Monitoring Station. The most current three years of data monitored at these monitoring stations are included in Table 3.2-4, *Ambient Air Quality Monitoring Summary*. The data show occasional violations of state and federal O₃ standards in the last three years.

Table 3.2-4 Ambient Air Quality Monitoring Summary

Pollutant/Standard	Number of Days Threshold Were Exceeded and Maximum Levels during Such Violations ^{1,2}		
	2022	2023	2024
Ozone (O₃)			
State 1-Hour $\geq$ 0.09 ppm (days exceed threshold)	1	0	2
State & Federal 8-hour $\geq$ 0.070 ppm (days exceed threshold)	2	3	3
Maximum 1-Hour Concentration (ppm)	0.095	0.091	0.112
Maximum 8-Hour Concentration (ppm)	0.083	0.079	0.080
Nitrogen Dioxide (NO₂)			
State 1-Hour $\geq$ 0.18 ppm (days exceed threshold)	0	0	0
Maximum 1-Hour Concentration (ppb)	0.0512	0.0384	0.0421
Fine Particulates (PM_{2.5})			
Federal 24-Hour $>$ 35 $\mu\text{g}/\text{m}^3$ (days exceed threshold)	0	0	0
Maximum 24-Hour Conclusion ($\mu\text{g}/\text{m}^3$)	13.9	24.5	21.1

Source: CARB 2025d.

Notes: ppm = parts per million; ppb = parts per billion; $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter; * = Data not available

1. Data for O₃, NO₂, and PM_{2.5} from the San Diego-Kearny Villa Road station on 6125A Kearny Villa Road.

2. Most recent data available as of September 2025.

Existing Emissions

The existing elementary school operations currently generate criteria air pollutant emissions from area sources (e.g., use of landscaping equipment, maintenance activities such as architectural coating), energy use (i.e., natural gas used for heating), and mobile sources (i.e., student and staff trips to the project site).

3.2 AIR QUALITY

Sensitive Receptors

Some land uses are considered more sensitive to air pollution (i.e., TACs) than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases.

Residential areas are also considered sensitive to air pollution because residents (e.g., children and the elderly) tend to be at home for extended periods, resulting in sustained exposure to any pollutants present. Other sensitive receptors include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent, because most workers tend to stay indoors most of the time. In addition, the workforce is generally the healthiest segment of the population.

The nearest off-site sensitive receptors are the residences surrounding the project site, including residences on Union Street and Halcyon Road.

3.2.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, *Environmental Checklist Form*, of the California Environmental Quality Act (CEQA) Guidelines states that, "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." The proposed project would result in a significant air quality impact if it would:

- a) Conflict with or obstruct implementation of the applicable air quality plan.
- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
- c) Expose sensitive receptors to substantial pollutant concentrations.
- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

SAN DIEGO AIR POLLUTION CONTROL DISTRICT THRESHOLDS

CEQA allows for the significance criteria established by the applicable air quality management or air pollution control district to be used to assess impacts of a project on air quality. However, the SDAPCD does not provide CEQA significance thresholds for any air pollutant source it does not directly regulate. The SDAPCD regulates emissions from stationary sources and not mobile sources under SDAPCD Regulation II, Rule 20.2, Table 20-2-1, Air Quality Impact Analysis (AQIA) Trigger Levels. Because the SDAPCD does not prescribe emissions thresholds for all air pollutants during construction and operation, SDAPCD recommends using the County of San Diego's (County) guidelines to evaluate potential air quality impacts relative to CEQA (San Diego 2007).

Regional Emission Thresholds

The County recognizes the SDAPCD's established screening level thresholds for air quality emissions (Rules 20.1 et seq.) as screening-level thresholds for land development projects. The County has also adopted the South Coast AQMD's screening threshold of 55 pounds per day (lbs./day) or 10 tons per year (tons/year) as a screening level threshold for PM_{2.5}, and the South Coast AQMD's screening threshold of 75 lbs./day or 13.7 tons/year significance threshold for VOCs (South Coast AQMD 2023). Table 3.2-5, *County of San Diego Screening-Level Thresholds for Air Quality Impact Analysis*, lists regional emissions thresholds used in the following analysis.

Table 3.2-5 County of San Diego Screening-Level Thresholds for Air Quality Impact Analysis

Air Pollutant	Thresholds	
	lb/day	Tons/year
Volatile Organic Compounds (VOCs)	75 lbs./day ¹	13.7 tons/year ²
Carbon Monoxide (CO)	550 lbs./day	100 tons/year
Nitrogen Oxides (NO _x)	250 lbs./day	40 tons/year
Sulfur Oxides (SO _x)	250 lbs./day	40 tons/year
Particulates (PM ₁₀)	100 lbs./day	15 tons/year
Particulates (PM _{2.5}) ³	55 lbs./day	10 tons/year

Source: San Diego 2007.

Notes: Based on SDAPCD Regulation 2, 20.2 (d) (2): Operational Emission Thresholds, and SDAPCD Regulation 20.3.

1. Threshold for VOCs based on the threshold of significance for VOCs from the South Coast AQMD for the Coachella Valley.
2. 13.7 tons per year threshold based on 75 pounds per day multiplied by 365 days per year and divided by 2,000 pounds per ton.
3. US EPA 2005. Also used by the South Coast AQMD.

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Projects that exceed the regional significance threshold contribute to the nonattainment designation of the SDAB. The attainment designations are based on the AAQS, which are set at levels of exposure that are determined to not result in adverse health effects. Exposure to fine particulate pollution and ozone (O₃) causes myriad health impacts, particularly to the respiratory and cardiovascular systems.

Mass emissions in Table 3.2-5 are not correlated with concentrations of air pollutants but contribute to the cumulative air quality impacts in the SDAB. Therefore, regional emissions from a single project do not usually trigger a regional health impact. SDAPCD is the primary agency responsible for ensuring the health and welfare of individuals sensitive to elevated concentrations of air quality in the SDAB. To achieve the health-based standards established by the EPA, SDAPCD prepared the 2022 RAQS on how SDAB would achieve attainment of the state and national AAQS through the SIP (SDAPCD 2022).

Carbon Monoxide (CO) Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hot spots. These pockets have the potential to exceed the state's one-hour standard of 20 parts per million (ppm) or the eight-hour standard of nine ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQSs is typically demonstrated through an analysis of localized CO concentrations. Hot spots are typically produced at intersections where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the SDAB and in the state have steadily declined.

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).

To generate a significant CO impact 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 (BAAQMD 2023). As the SDAPCD does not currently have adopted CO hotspot screening guidance, guidance from the Bay Area Air Quality Management District (BAAQMD) is utilized herein to

determine whether the proposed project may result in potentially significant impacts related to CO hotspot generation.

Localized Significance Thresholds

Pursuant to the County of San Diego's *Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality* (San Diego 2007), a project whose stationary source emissions do not exceed or can be mitigated to less than the screening-level thresholds outlined in SDAPCD Rule 20.2 (refer to Table 3.2-5) would not be considered to violate an air quality standard or contribute substantially to an existing or projected air quality violation. Projects that exceed these thresholds would be required to conduct an air quality impact analysis to determine the concentrations of stationary emissions at nearby sensitive receptors.

Health Risk

Whenever a project would require use of chemical compounds that have been identified in SDAPCD Rule 1210: Toxic Air Contaminant Health Risks – Public Notification and Risk Reduction, placed on CARB's air toxics list pursuant to Assembly Bill (AB) 1807, or placed on the Environmental Protection Agency's (EPA) National Emissions Standards for Hazardous Air Pollutants, an HRA is required by the SDAPCD. Table 3.2-6, *County of San Diego Toxic Air Contaminants Incremental Risk Thresholds*, lists the County's TAC incremental risk thresholds for operation of a project.

Table 3.2-6 County of San Diego Toxic Air Contaminants Incremental Risk Thresholds

Maximum Incremental Cancer Risk	≥ 10 in 1 million
Hazard Index (project increment)	≥ 1.0

Source: San Diego 2007.

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]). CEQA does not require a CEQA-level environmental document to analyze the environmental effects of attracting development and people to an area.

METHODOLOGY

This air quality evaluation was prepared in accordance with the requirements of CEQA to determine if significant air quality impacts are likely to occur in conjunction with future development that would be accommodated by the proposed project.

Regional air pollutant emissions are calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1. CalEEMod compiles an emissions inventory of construction

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(fugitive dust, off-gas emissions, on-road emissions, and off-road emissions), area sources, indirect emissions from energy use, mobile sources, indirect emissions from waste disposal (annual only), and indirect emissions from water/wastewater (annual only). The following is a summary of the assumptions used for the proposed project's analysis.

Air Quality Emissions Modeling

Construction

The proposed project involves the demolition and reconstruction of all existing uses on the project site, with the exception of the Old Schoolhouse. Construction activities would occur within the boundaries of the project site and would disturb approximately 7.23 acres of the 7.35-acre site.

Construction associated with the rebuild would start June 2026 and end August 2027. During the duration of construction activities, students at Paul Ecke Central Elementary School would attend school at the Park Dale Lane and El Camino Creek elementary school campuses and would be housed in temporary portable classrooms. Equipment associated with the installation and removal of these portable buildings at the off-site campuses is incorporated within the maximum daily regional emissions analysis. Construction activities would also include demolition of the buildings at the project site, site preparation, grading, building construction, paving, and architectural coating. Construction air pollutant emissions are based on the preliminary information provided by the District. The equipment mix, as well as construction worker and vendor trips, were based on CalEEMod default assumptions.

Mobile emissions associated with the transportation of students to the Park Dale Lane and El Camino Creek elementary school campuses would occur during construction of the proposed project. As noted in the Transportation Impact Analysis for the proposed project (Appendix 3.8-1), 50 percent of Paul Ecke students attending the two respective campuses are assumed to be transported via school buses while the remaining half would be driven via passenger vehicles. Based on the Institute of Transportation Engineer's (ITE) 12th Edition of the Trip Generation Manual Elementary School Land Use Code (ITE Code 520), elementary school land uses generate 2.27 average daily trips per student (ITE 2025). Per the assumptions noted in the Transportation Impact Analysis, six total buses would be required to transport half of the students to the two off-site elementary schools. Using these assumptions and applying the ITE trip rate for the remaining students that would not take buses, 654 average daily trips would occur each school day.² As noted, these emissions would be temporary and concurrent with

² The Traffic Impact Analysis (Appendix 3.8-1) assumes that approximately 265 students would be temporarily relocated to Park Dale Lane school and that 300 students would be temporarily relocated to El Camino Creek school. Half of these students going to each school would take the bus and each bus would be able to accommodate 50 students. Therefore, three buses would be required for each school, resulting in six buses total

construction activities. Therefore, these emissions are incorporated into the maximum daily emissions associated with construction of the proposed project.

Operation

The proposed project would not increase the number of students or staff at the project site. As a result, no net increase in vehicle trips would occur, and mobile emissions associated with the proposed project would be the same as existing conditions. However, while the existing campus generates area and energy source emissions that would be similar to those under the proposed project, existing site emissions were not modeled. This analysis reflects the total increase in operational emissions, with the exception of mobile emissions.

Construction Health Risk Assessment

Guidance from the California Environmental Protection Agency (CalEPA), Office of Environmental Health Hazard Assessment (OEHHA), and California Air Pollution Control Officers Association recommend the completion of an HRA to determine the impacts of hazardous air emissions upon sensitive receptors in the vicinity of the project. As a result, a site-specific construction HRA was prepared for the proposed project to evaluate the potential health impacts to nearby sensitive receptors from construction equipment exhaust (specifically DPM) (Appendix 3.2-2).

Sources evaluated in the HRA include off-road construction equipment and heavy-duty diesel trucks along the truck haul route. The average daily emission rates from construction equipment used during the proposed project were determined by dividing the annual average emissions for each construction year by the number of construction days per year for each calendar year of construction. For the purposes of this analysis, off-site emissions along North Vulcan Avenue 1,000 feet north and south of the project site were calculated since trucks would use this roadway to access the project site.

Air dispersion modeling is based on the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) 13.0 air dispersion modeling program and the latest HRA guidance from the OEHHA to estimate excess lifetime cancer risks and chronic noncancer hazard indices at the nearest maximum exposed off-site sensitive receptors (OEHHA 2015). No on-site receptors would be present during construction of the proposed project. The installation and removal of the portable buildings housing Paul Ecke students would occur off site at the Park Dale Lane and El Camino Creek elementary school campuses approximately 3

and 12 total bus trips per day. The remaining half of the 565 total students (283 students) would not take the buses. Average daily trips for these students are assumed 2.27 trips per student, based on the elementary school land use code of 12th Edition of the ITE Manual. Therefore, there would be a total of 642 non-bus trips per day. Accounting for both categories of trips, there would be 654 trips per day.

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miles and 2.3 miles from the project site, respectively. It is anticipated that installation and removal of the portable buildings at each campus would be conducted over a three-day period with two cranes, resulting in minor increases in localized emissions at the respective school sites. Overall, due to the short construction durations, the distances of the two off-site campuses to the project site, and the minimal construction activities, the emissions associated with these activities at the two off-site campuses are not incorporated within the HRA analysis.

3.2.4 Project Impact Analysis

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the San Diego 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 a 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 SANDAG's intergovernmental review criteria are considered consistent with the RAQS.

The proposed project involves the rebuild of an existing elementary school. The proposed project would not increase enrollment or capacity at the project site and would continue to serve the student population in the nearby communities. 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 will come from the region. 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 City of Encinitas and would be subject to the County of San Diego thresholds under the SDAPCD. Projects whose stationary source emissions do not exceed the San Diego County'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 b), the proposed project's short-term construction and long-term operational emissions would not result in significant impacts based on the San Diego County's regional significance thresholds. Therefore, the proposed project would not conflict or obstruct implementation of the RAQS, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project 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?

The following describes project-related impacts from short-term construction activities and long-term operation of the proposed project.

As stated previously, the SDAB is designated under the California and National AAQS as nonattainment for O₃ (8-Hour), and under the California AAQS as nonattainment for O₃ (1-Hour), PM₁₀, and PM_{2.5} (SDACPD 2025a). SDAPCD recommends using the County of San Diego thresholds of significance when evaluating air quality impacts for a project. 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. Development projects below the San Diego County's regional significance thresholds are not expected to generate sufficient criteria pollutant emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Regional Short-Term Construction Impacts

Construction activities would result in the generation of air pollutants. These emissions would primarily be exhaust from off-road diesel-powered construction equipment, dust generated by construction activities, exhaust from on-road vehicles, and off-gassing of VOCs from paints and asphalt.

The proposed project would tentatively begin in June 2026 and be completed in August 2027. Construction activities would include building and asphalt demolition, grading, site preparation, utility trenching (interim portables installation and removal), building construction, asphalt paving, and architectural coating. As shown in Table 3.2-7, *Maximum Daily and Annual Regional Construction Emissions*, maximum daily from project-related construction activities would not exceed the County's regional emissions thresholds. Table 3.2-8, *Annual Regional Construction Emissions*, shows that annual construction would not exceed the County's regional emissions thresholds.

Additionally, while not directly associated with construction activities, the project's temporary increase in mobile source emissions associated with transport of Paul Ecke students to the Park Dale Lane and El Camino Creek elementary school campuses are also accounted for in these tables. These emissions would be generated concurrently with construction emissions.

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Table 3.2-7 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 2026						
Demolition and Installation of Portables	8	40	71	<1	16	5
Site Preparation	6	32	51	<1	28	13
Grading	4	18	39	<1	14	5
Building Construction 2026	4	13	36	<1	5	2
Year 2027						
Building Construction 2027	4	12	36	<1	5	2
Building Construction, Paving, Removal of Portables, and Architectural Coating	26	22	44	<1	6	2
Temporary Mobile Emissions³						
Student Relocation Trips	3	2	21	<1	5	1
Overall Project						
Maximum Daily Construction Emissions (lbs./day)	26	40	71	<1	28	13
County of San Diego Screening-Level Thresholds	75	250	550	250	100	55
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1; San Diego 2007. Highest winter or summer emissions are reported. (See Appendix 3.2-1).

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.
3. Mobile emissions associated with the temporary relocation of students to the Park Dale Lane ES and El Camino Creek ES campuses would be generated concurrently with construction activities occurring each construction workday during the school year. Therefore, these mobile emissions are added to each activity's emissions to account for the total maximum daily emissions.

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Table 3.2-8 Annual Regional Construction Emissions

Construction Phase	Pollutants (tons/year) ^{1, 2,3}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2026	0.10	0.49	0.86	<0.005	0.19	0.06
2027	0.31	0.84	1.23	<0.005	0.23	0.06
Maximum Annual Construction Emissions (tons/year)	0.31	0.84	1.23	<0.005	0.23	0.06
County of San Diego Screening-Level Thresholds	13.7	40	100	40	15	10
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1; San Diego 2007. (See Appendix 3.2-1)

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.
3. Mobile emissions associated with the temporary relocation of students to the Park Dale Lane and El Camino Creek elementary school campuses would be generated concurrently with construction activities during each construction workday during the school year. These emissions would occur for 180 days throughout the duration of construction activities (based on the days school would be in session according to the Encinitas Union School District Calendar 2026-2027), 82 days in 2026 and 98 days in 2027.

The existing buildings to be demolished may release asbestos fibers, which is a mineral fiber that has been used in a variety of building construction materials for insulation and as a fire retardant (US EPA 2024). Exposure to asbestos increases the risk of major health effects, including lung cancer, mesothelioma, and asbestosis. As such, SDAPCD Rule 1206: Asbestos Removal, Renovation, and Demolition, incorporates the requirements of the federal asbestos requirements found in National Emission Standards for Hazardous Air Pollutants and includes additional requirements to minimize exposure to asbestos fibers. SDAPCD Rule 1206 requires a facility survey for certain projects to determine if asbestos is present prior to commencement of renovation or demolition. If more than 100 square feet of asbestos-containing materials will be disturbed or a demolition will occur, a notification must be submitted to the SDAPCD, and procedures for asbestos emission control and waste handling/disposal must be in compliance with SDAPCD Rule 1206. As shown in Table 3.2-7 and Table 3.2-8, criteria pollutant emissions generated during construction of the proposed project would not exceed the County's screening-level emissions thresholds and would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an

3.2 AIR QUALITY

applicable federal or state AAQS. Air quality impacts from project-related construction activities would be **less than significant**.

Significance without Mitigation: Less than significant.

Long-Term Operation-Related Regional Impacts

Long-term air pollutant emissions associated with the proposed project would consist of area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement). Typically, the primary source of long-term criteria air pollutant emissions generated by a project would be mobile emissions from project-generated vehicle trips. However, the proposed project would not increase enrollment or capacity at the project site and, therefore, would not result in new mobile emissions to the project site. Additionally, the proposed project would be designed to be all-electric and would not result in emissions associated with energy use. The proposed project's area source emissions are shown in Table 3.2-9, *Maximum Daily and Annual Long-Term Operational Emissions*.

Table 3.2-9 Maximum Daily and Annual Long-Term Operational Emissions

	Pollutants					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Maximum Daily Area Source Emissions (lbs./day)	2.50	0.03	3.70	0.00	0.01	0.00
County of San Diego Screening-Level Thresholds (maximum lbs./day)	75	250	550	250	100	55
Significant?	No	No	No	No	No	No
Annual Area Source Emissions (tons/year)	0.40	< 0.005	0.33	< 0.005	< 0.005	< 0.005
County of San Diego Screening-Level Thresholds (annual tons/year)	13.7	40	100	40	15	10
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1; San Diego 2007. Highest winter or summer emissions are reported. (Appendix 3.2-1)

Note: The proposed project would be all-electric and would not result in a permanent net increase in vehicle trips. Area source emissions reflect the total increase in emissions and do not account existing emissions associated with the existing campus buildings.

Overall, operation of the proposed project would not result in a substantial increase in emissions compared to existing conditions and would not exceed the San Diego County's operational screening-level thresholds. Therefore, impacts to the regional air quality associated with operation of the proposed project would be **less than significant**.

Significance without Mitigation: Less than significant.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

The proposed project could expose sensitive receptors to elevated pollutant concentrations if it causes or significantly contributes to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air pollutant concentration rather than mass emissions so they can be more readily correlated to potential health effects.

Localized Impacts – Criteria Air Pollutants

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

Furthermore, operation of the proposed project would not generate substantial quantities of criteria air pollutant emissions from on-site, stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SDAPCD include industrial land uses, such as chemical processing, and warehousing operations where substantial truck idling could occur on site. The proposed project does not fall within these categories of uses. As identified in Impact b), on-site criteria air pollutant emissions generated from construction and operation of the proposed project would be substantially below the County's thresholds; and therefore, localized impacts are also considered **less than significant**.

Significance without Mitigation: Less than significant.

Health Risk – Toxic Air Contaminants and PM_{2.5}

Construction Health Risk

The proposed project would elevate concentrations of TACs and construction PM_{2.5} in the vicinity of sensitive land uses (i.e., sensitive receptors for the purposes of air quality analysis) during construction activities. To assess potential localized impacts from PM_{2.5} emissions, the SDAPCD Rule 20.2 AQIA trigger levels for PM_{2.5} of 67 pounds per day or 10 tons per year are used as screening-level criteria per SDAPCD guidance (SDAPCD 2025b). A project that generates mass emissions of PM_{2.5} below the screening-criteria would be considered to result in less-than-significant localized PM_{2.5} impacts. As shown in Table 3.2-8, the proposed project would not generate maximum daily and annual PM_{2.5} emissions that exceed the AQIA trigger levels.

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Therefore, localized PM_{2.5} impacts from project-related construction activities would be less than significant.

Emissions from construction equipment primarily consist of DPM. The OEHHA adopted new guidance for the preparation of HRAs in March 2015 (OEHHA 2015). OEHHA has developed a cancer risk factor and noncancer 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.

However, a site-specific construction HRA of TACs was prepared since the proposed project would elevate concentrations of TACs (i.e., DPM) in the vicinity of sensitive land uses during temporary construction activities that would use off-road equipment operating on site, and at different levels depending on the type of activity. The nearest off-site sensitive receptors are the residences surrounding the project site to the east, north, and south, and workers at the businesses to the west of the project site along North Coast Highway 101. Health risks at the Bambini Montessori Spanish Academy, which hosts children as young as three months, have also been calculated for this analysis.

The results of the construction HRA analysis are shown in Table 3.2-10, *Unmitigated Construction Risk Summary*, and demonstrate that construction activities associated with the proposed project would exceed the County's thresholds at the maximally exposed residential receptor for cancer risk.

Table 3.2-10 Unmitigated Construction Risk Summary

Receptor ¹	Cancer Risk (per million)	Chronic Hazards
Residential MER	17.41	<0.1
Daycare MER – Bambini Montessori Spanish Academy	0.18	<0.1
Worker MER – 422 N Coast Highway 101	0.05	<0.1
County of San Diego Threshold	10	1.0
Exceeds Threshold?	Yes	No

Source: Appendix 3.2-2.

Notes: MER = Maximally Exposed Receptor.

1. Each MER receptor type was based on overall MER location, representing the point of maximum exposure from all source group areas, and was used for the AERMOD results and HRA.
2. Calculated cancer risk and chronic hazards from both project components were added together to evaluate overall project impacts.

The following results of the HRA are based on the maximum receptor concentration over 14 months of construction exposure for receptors:

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Cancer risk for the maximum exposed off-site resident from construction activities related to the proposed project were calculated to be 17.41 in a million, which would exceed the 10 in a million-significance threshold.

Cancer risk for the maximum exposed daycare receptor from construction activities would be 0.18 in a million and would not exceed the 10 in a million-significance threshold.

Cancer risk for the maximum exposed off-site worker from construction activities related to the proposed project were calculated to be 0.05 in a million, which would not exceed the 10 in a million-significance threshold.

- For non-carcinogenic effects, the chronic hazard index identified for each toxicological endpoint totaled less than one for all the off-site sensitive receptors. Therefore, chronic non-carcinogenic hazards are less than significant.

Because the cancer risk for the off-site residential maximally exposed receptor (Residential MER) would exceed the County's significance threshold, construction activities associated with the proposed project are **potentially significant**.

Impact AIR-1: The proposed project would result in an exceedance of cancer health risk impacts for the maximally exposed residential receptor.

Mitigation Measure AIR-1: The Encinitas Union School District (District) shall require the incorporation of the following to reduce air pollutant emissions during construction activities:

- Prior to the request for bids for construction contractors, the Director of Facilities and Safety or designee shall specify in the construction bid that the construction contractor shall use equipment that meets the United States Environmental Protection Agency (EPA)-Certified Tier 4 Interim or stricter emissions standards for project-related off-road diesel-powered construction equipment during all ground-disturbing including but not limited to site preparation, grading, and asphalt paving.
- Prior to construction, the project engineer shall ensure that all construction plans clearly show the requirement for EPA Tier 4 Interim or higher emissions standards for construction equipment over 50 horsepower.
- During project construction, the construction contractor shall ensure that all emissions control devices used by the contractor achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by California

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Air Resources Board regulations, unless it can be demonstrated to the District that such equipment is not commercially available. For purposes of this measure, “commercially available” shall mean the availability of Tier 4 Interim and Tier 4 Final engines similar to the availability for other large-scale construction projects in the City occurring at the same time and taking into consideration factors such as (i) potential significant delays to critical-path timing of construction and (ii) geographic proximity to the project site of Tier 4 Interim and Tier 4 Final equipment. Where such equipment is not commercially available, as demonstrated by the construction contractor, Tier 3 equipment retrofitted with a California Air Resources Board’s Level 3 Verified Diesel Emissions Control Strategy (e.g., diesel particulate filter) shall be used.

- During construction, the construction contractor shall maintain a list of all operating equipment in use on the project site for verification by the Director of Facilities and Safety or designee. The construction equipment list shall state the makes, models, Engine Family Number, Equipment Identification Numbers, and numbers of construction equipment onsite.

These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to Division of the State Architect (DSA) and verified by the District.

Significance with Mitigation: Less than significant.

As shown in the following Table 3.2-11, *Mitigated Construction Risk Summary*, incorporation of Mitigation Measure AIR-1 requiring the use of construction equipment that meets Tier 4 Interim standards would reduce the proposed project’s localized construction emissions at the residential MER to 4.41 in one million. As such, implementation of Mitigation Measure AIR-1 would reduce impacts to below the County’s significance threshold of 10 in one million and impacts would be reduced to less than significant.

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Table 3.2-11 Mitigated Construction Risk Summary

Receptor¹	Cancer Risk (per million)	Chronic Hazards
Residential MER	4.41	0.007
Day Care MER – Bambini Montessori Spanish Academy	0.04	<0.001
Worker MER – 422 N Coast Highway 101	0.01	0.001
County of San Diego Threshold	10	1.0
Exceeds Threshold?	No	No

Source: Appendix 3.2-2.

Notes: MER = Maximally Exposed Receptor.

1. Each MER receptor type was based on overall MER location, representing the point of maximum exposure from all source group areas, and was used for the AERMOD results and HRA.
2. Calculated cancer risk and chronic hazards from both project components were added together to evaluate overall project impacts.

Operational Health Risk

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 TACs and typically do not exacerbate existing hazards, so these thresholds are typically applied to new industrial projects. However, Section 21151.8 of the Public Resources Code requires evaluation of air quality hazards for school site acquisition or construction of a K-12 school.

The primary sources of potential air toxics associated with current project operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent building operations (e.g., natural gas-fired boilers). However, overall, educational land uses are not the types of land uses that generate a substantial number of trucks or a substantial amount of TAC emissions. Land uses that have the potential to generate substantial stationary sources of emissions include industrial projects that require a permit from SDAPCD, such as chemical processing, or warehousing projects where substantial truck idling could occur on site (CARB 2005).

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The proposed project involves site improvements at the existing Paul Ecke Central Elementary campus and would not include uses typically associated with generating substantial stationary sources of emissions. In addition, the proposed and renovated buildings would be required to comply with the latest energy efficiency standards set forth by California Building Energy Efficiency Standards. The proposed new school buildings would generate a similar electricity demand compared to existing conditions and would not directly generate criteria pollutants. Therefore, the proposed project would not expose receptors to substantial concentrations of criteria air pollutants, and operational criteria air pollutant emissions would not exceed the California AAQS. As such, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

CO Hotspots

As mentioned previously, in 1998, the SDAPCD was designated as in attainment for CO under both the California AAQS and National AAQS. 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 mixing is substantially limited—to generate a significant CO impact (BAAQMD 2023). As the SDAPCD does not currently have adopted CO hotspot screening guidance, guidance from the BAAQMD is utilized herein to determine whether the proposed project may result in potentially significant impacts related to CO hotspot generation.

As the proposed project would not result in an increase in student capacity or enrollment, there would not be an increase in the number of daily trips when compared to the existing conditions. 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. Typical projects, like the proposed project, would not expose sensitive receptors to substantial pollutant concentrations and analysis of CO hotspots is not warranted. Therefore, operation of the proposed project would not result in the volume of traffic required (i.e., 24,000 to 44,000 peak hour vehicle trips) to generate a CO hotspot at intersections within the project traffic study area, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

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

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 school campus rebuild would not result in the types of odors generated by the aforementioned land uses. Additionally, emissions from construction equipment, such as diesel exhaust and VOCs from architectural coatings and paving activities, may generate odors. However, these odors would be low in concentration, temporary, and are not expected to affect a substantial number of people. Therefore, overall, odor impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.2.5 Cumulative Impact Analysis

The geographic scope considered for cumulative air quality impacts is the SDAB. According to the San Diego County's *Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality*, to determine cumulative air quality impacts from a project, the analysis must specifically evaluate the project's contribution to the cumulative increase in pollutants for which the SDAB is designated as nonattainment for the California AAQS and National AAQS.

San Diego County's Guidelines note that, with respect to construction emissions, a project that has a significant direct impact on air quality emissions would also have a significant cumulatively considerable net increase. Additionally, if the project does not exceed thresholds and is determined to have less-than-significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality if the emissions from the project components, in combination with the emissions from other proposed or reasonably foreseeable future projects, are in excess of established thresholds.

With respect to cumulative operational impacts for the SDAB, the RAQS serves as the long-term regional air quality planning document for the purpose of assessing cumulative operational emissions within the basin to ensure the SDAB continues to make progress toward National AAQS and California AAQS attainment status. As such, cumulative projects located in the San

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Diego region would have the potential to result in a cumulative impact to air quality if, in combination, they would conflict with or obstruct implementation of the RAQS. Similarly, individual projects that are inconsistent with the regional planning documents on which the RAQS is based would have the potential to result in cumulative impacts if they represent development beyond regional projections.

Would the project have a cumulative effect related to air quality?

Conflicts/Obstruction of an Air Quality Plan

As discussed in Impact a), the proposed project would result in a rebuild of an existing campus and would not generate increased enrollment or employment. Therefore, the proposed project's emissions would not result in air quality impacts that were not previously envisioned in the growth projections and RAQS, and implementation of the proposed project would not result in development in excess of that anticipated in local plans or increases beyond those contemplated by SANDAG. Additionally, as shown in Tables 3.2-7, 3.2-8, and 3.2-9, the emissions of all criteria pollutants associated with construction and operation of the proposed project would be below the significance levels. Therefore, the proposed project would be consistent at a regional level with the underlying growth forecasts in the RAQS. Therefore, the proposed project's adverse effects from short-term construction emissions and long-term operational emissions **would not be cumulatively considerable**.

Regional Air Quality Emissions

Air pollution by nature is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SDAPCD develops and implements plans for future attainment of AAQs. The potential for the proposed project to result in a cumulatively considerable impact, specifically, a cumulatively considerable new increase of any criteria pollutant for which the project region is nonattainment under an applicable National AAQS and/or California AAQS is addressed in Impact b). The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment during construction and operation of the proposed project.

Additionally, cumulative projects in the project vicinity and SDAB would be required to comply with applicable SDAPCD rules to reduce impacts. The proposed project would not contribute to exceedance of established thresholds. Therefore, the proposed project's adverse effects related to a net increase of any criteria pollutant for which the project region is non-attainment **would not be cumulatively considerable**.

Localized Air Quality Emissions

As discussed in Impact c), the health risk impacts associated with the proposed project would be mitigated to less than significant with the incorporation of Mitigation Measure AIR-1, requiring the use of off-road equipment that meet Tier 4 Interim emissions standards. Therefore, construction of the proposed project would have less-than-significant impacts related to exposure of sensitive receptors to substantial pollutant concentrations from TACs and would not contribute to a cumulative increase in localized emissions in the project vicinity. Additionally, the proposed project would not cause or create a CO hotspot, nor would it emit substantial quantities of criteria pollutant emissions during operation. Therefore, the proposed project's adverse effects related to exposing sensitive receptors to substantial pollutant concentrations **would not be cumulatively considerable**.

Odors

As discussed in Impact d), the proposed project would result in a less-than-significant impact regarding emissions, such as odors during construction and operation, that would adversely affect a substantial number of people. Odor impacts are generally limited to the immediate area surrounding the source. SDAPCD Rule 51 also prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person.

The proposed project would not include operations of uses that result in nuisance odors. All cumulative projects would undergo project-specific evaluation during project application process that would identify any potential emissions or odor-causing uses. Should any potentially significant impacts be identified in those project-specific evaluations, mitigation would be implemented to reduce impacts to a less-than-significant level. Because the proposed project was determined to have less-than-significant impacts regarding emissions that would adversely affect a substantial number of people, the project's impacts **would not be cumulatively considerable**.

Significance with Mitigation: Less than significant.

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3.3 CULTURAL AND PALEONTOLOGICAL RESOURCES

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts of the Paul Ecke Central Elementary School Rebuild Project (proposed project) on cultural and paleontological resources at the Paul Ecke Central Elementary School. With the update of the California Environmental Quality Act (CEQA) Guidelines approved in December 2018, impacts to paleontological resources moved to the Geology and Soils section of the Appendix G checklist. However, the Geology and Soils topic has been determined to have no impact or a less-than-significant impact and is analyzed in Chapter 5, *Other CEQA Considerations*, of this DEIR. Given the potential impacts that could occur to paleontological resources, this DEIR analyzes paleontological resources as part of this section.

Appendix 3.3-1, *Cultural Resources Assessment*, of this DEIR, includes an analysis of the cultural resources present in the project area, prepared by Cogstone. Appendix 3.3-2, *Historic Building Survey for Building #A*, of this DEIR, documents the historical significance of Building A, prepared by Cogstone. Appendix 3.3-3, *Secretary of the Interior (SOI) Compatibility Assessment for the Old Schoolhouse*, of this DEIR, evaluates the Old Schoolhouse's compatibility with the SOI's Standards for the Treatment of Historic Properties, prepared by Cogstone.

3.3.1 Regulatory Framework

Federal, state, and local laws related to cultural resources that are applicable to the proposed project are summarized below.

FEDERAL

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The Act authorized the National Register of Historic Places (NRHP), which lists districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review ensures that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process with assistance from state historic preservation offices.

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National Register of Historic Places

The NRHP is the nation’s official list of buildings, structures, objects, sites, and districts worthy of preservation because of their significance in American history, architecture, archaeology, engineering, and culture. The NRHP recognizes resources of local, state, and national significance that have been documented and evaluated according to uniform standards and criteria.

Authorized under the NHPA, the NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect historic and archaeological resources. The NRHP is administered by the National Park Service, which is part of the United States (U.S.) Department of the Interior.

To be eligible for listing in the NRHP, a resource must meet at least one of the following criteria:

- A. Is associated with events that have made a significant contribution to the broad patterns of our history.
- B. Is associated with the lives of significant persons in our past.
- C. Embodies the distinctive characteristics of a type, period, or method of construction; represents the work of a master, or possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.
- D. Has yielded, or may be likely to yield, information important in history or prehistory.

A final critical component of eligibility is “integrity.” Integrity refers to retaining enough historic character or appearance to convey the reasons for significance according to the four basic criteria. The NRHP criteria recognize seven aspects or qualities of integrity: location, design, setting, materials, workmanship, feeling, and association.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 regulates the protection of archaeological resources and sites on federal and Native American lands.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act is a federal law passed in 1990 that mandates museums and federal agencies to return certain Native American cultural items (e.g., human remains, funerary objects, sacred objects, or objects of cultural patrimony) to lineal descendants or culturally affiliated Indian tribes.

3.3 CULTURAL AND PALEONTOLOGICAL RESOURCES

Paleontological Resources Preservation Act

The Paleontological Resources Preservation Act was enacted as Public Law 111-11, Title VI Subtitle D of the Omnibus Public Land Management Act of 2009 (16 US Code Sections 470aaa–470aaa-11) and directs the Department of Agriculture (United States [US] Forest Service) and the Department of the Interior (National Park Service, Bureau of Land Management, Bureau of Reclamation, and Fish and Wildlife Service) to implement comprehensive paleontological resource management programs. The US Forest Service published the Department of Agriculture version of the Preservation Act regulations in the Federal Register in April 2015.

Preservation of American Antiquities

The Federal Antiquities Act of 1906 was enacted with the primary goal of protecting cultural resources in the United States. It explicitly prohibits appropriation, excavation, injury, and destruction of any “historic or prehistoric ruin or monument, or any object of antiquity” on lands owned or controlled by the federal government without permission of the secretary of the federal department with jurisdiction. It also established criminal penalties for these acts, including fines and/or imprisonment. Neither the Antiquities Act itself nor its implementing regulations specifically mention paleontological resources. However, several federal agencies—including the National Park Service, the Bureau of Land Management, and the US Forest Service—have interpreted objects of antiquity to include fossils. Consequently, the Antiquities Act also represents an early cornerstone for efforts to protect the nation’s paleontological resources.

STATE

California Public Resources Code

Archaeological, paleontological, and historical sites are protected under a wide variety of state policies and regulations in the California Public Resources Code (PRC). In addition, cultural and paleontological resources are recognized as nonrenewable resources and receive protection under the PRC and CEQA.

PRC Sections 5020 to 5029.5 establish the State Historical Resources Commission as the successor of the Historical Landmarks Advisory Committee. The Commission oversees the administration of the California Register of Historical Resources (CRHR) and is responsible for designating State Historical Landmarks and Historical Points of Interest.

PRC Sections 5079 to 5079.65 define the functions and duties of the Office of Historic Preservation, which administers federal- and state-mandated historic preservation programs in California as well as the California Heritage Fund.

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PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites, identify the powers and duties of the Native American Heritage Commission (NAHC), require that descendants be notified when Native American human remains are discovered, and provide for treatment and disposition of human remains and associated grave goods.

Requirements for paleontological resource management are included in California PRC Division 5, Chapter 1.7, Section 5097.5, which states:

A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

These statutes prohibit the removal, without permission, of any paleontological site or feature from land under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, local agencies are required to comply with PRC Section 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. PRC Section 5097.5 also establishes the removal of paleontological resources as a misdemeanor and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (i.e., state, county, city, and district) land.

California Register of Historical Resources

The State Historical Resources Commission designed this program for state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The CRHR is the authoritative guide to the state's significant historical and archaeological resources.

The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA.

To be eligible for listing in the CRHR, a resource must meet at least one of the following criteria:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of person important to local, California or national history.

3.3 CULTURAL AND PALEONTOLOGICAL RESOURCES

3. Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to prehistory or history of the local area, California, or the nation. (California Public Resources Code [PRC] Section 5024.1[c])

In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time in which significant events transpired or significant individuals made their important contributions. Integrity is the authenticity of a historical resource's physical identity as evidenced by the survival of characteristics or historic fabric that existed during the resource's period of significance. Alterations to a resource or changes in its use over time may have historical, cultural, or architectural significance. In summary, resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data.

California Health and Safety Code

Under California Health and Safety Code, Section 7050.5, if human remains are found, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are or believed to be of Native American origin, s/he shall notify the NAHC in Sacramento within 48 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons believed to be the most likely descendant. The descendant(s) shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the appropriate disposition of the human remains.

California Environmental Quality Act

CEQA requires a lead agency to analyze whether historic and/or archaeological resources may be adversely impacted by a proposed project. Under CEQA, a "project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment" (PRC Section 21084.1). Answering this question is a two-part process. First, the determination must be made as to whether the proposed project involves cultural resources. Second, if cultural resources are present, the proposed project must be analyzed for a potential "substantial adverse change in the significance" of the resource.

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Historical Resources

According to CEQA Guidelines Section 15064.5, for the purposes of CEQA, historical resources are:

- A resource listed in, or formally determined eligible...for listing in the California Register of Historical Resources (PRC 5024.1, Title 14 California Code of Regulations [CCR], Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significance in a historic resources survey meeting the requirements of Section 5024.1(g) of the PRC.
- Any object, building, structure, site, area, place, record, or manuscript that the lead agency determines to be eligible for national, state, or local landmark listing; generally, a resource shall be considered by the lead agency to be historically significant (and therefore a historic resource under CEQA if the resource meets the criteria for listing on the California Register (as defined in PRC Section 5024.1, Title 14 CCR, Section 4852).

Resources nominated to the CRHR must retain enough of their historic character or appearance to convey the reasons for their significance. Resources whose historic integrity (as previously defined) does not meet NRHP criteria may still be eligible for listing in the CRHR.

According to CEQA, the fact that a resource is not listed in or determined eligible for listing in the CRHR or is not included in a local register or survey shall not preclude the lead agency from determining that the resource may be a historical resource (PRC Section 5024.1). Pursuant to CEQA, a project with an effect that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (State CEQA Guidelines, Section 15064.5[b]).

Substantial Adverse Change and Indirect Impacts to Historical Resources

CEQA Guidelines specify that a “substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (state CEQA Guidelines, Section 15064.5). Material impairment occurs when a project alters in an adverse manner or demolishes “those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion” or eligibility for inclusion in the NRHP, CRHR, or local register. In addition, pursuant to state CEQA Guidelines Section 15126.2, the “direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects.”

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The following guidelines and requirements are of relevance to this study's analysis of indirect impacts to historic resources. Pursuant to CEQA Guidelines Section 15378, study of a project under CEQA requires consideration of "the whole of an action, which has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." State CEQA Guidelines (Section 15064[d]) further define direct and indirect impacts as follows:

- A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project.
- An indirect physical change in the environment is a physical change in the environment, which is not immediately related to the project, by which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment.
- An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project.

Archaeological Resources

PRC Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site with a high probability of meeting the following criteria, without merely adding to the current body of knowledge:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If it can be demonstrated that a proposed project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2[a], [b], and [c]). CEQA notes that if an archaeological resource is neither a unique archaeological resource nor a historical resource, the effects of the project on those resources shall not be considered to be a significant effect on the environment (state CEQA Guidelines Section 15064.5[c][4]).

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California State Historical Landmarks

California Historical Landmarks are buildings, structures, sites, or places that have been determined to have statewide historical significance by meeting at least one of the following criteria:

- The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California)
- Associated with an individual or group having a profound influence on the history of California

A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best-surviving work in a region of a pioneer architect, designer, or master builder

The resource also must have written consent of the property owner, be recommended by the State Historical Resources Commission, and be officially designated by the Director of California State Parks.

California State Points of Historical Interest

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historical resource may be designated as both a Landmark and a Point. If a Point is subsequently granted status as a Landmark, the Point designation will be retired. To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type within the local geographic region (city or county)
- Associated with an individual or group having a profound influence on the history of the local area

A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer, or master builder

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LOCAL

Encinitas General Plan

The Encinitas General Plan provides the basis for the City of Encinitas' (City's) policies and represents the community's basic values, ideals, and aspirations. The General Plan establishes policies to guide development and conservation. The Resource Management Element of the City of Encinitas General Plan includes the following policies related to cultural and paleontological resources (Encinitas 2011):

- **Policy 7.1.** Require that paleontological, historical, and archaeological resources in the planning area are documented, preserved or salvaged if threatened by new development.
- **Policy 7.2.** Conduct a survey to identify historic structures and archaeological/cultural sites throughout the community and ensure that every action is taken to ensure their preservation.

City of Encinitas Municipal Code

Encinitas Municipal Code Section 30.34.050, Cultural/Natural Resources Overlay Zone, requires the preparation of a survey for sites with known archeological sites or historical sites and structures to determine the significance of the sites and structures.

Encinitas North 101 Corridor Specific Plan

Section 7.0, Historic Preservation, of the North 101 Corridor Specific Plan, is intended to generate interest in and awareness of the North Highway 101 Corridor area's varied historic resources, and to focus appropriate attention on how to protect them.

Encinitas Register of Historic Places

The local Register is a comprehensive inventory of historic structures and properties that exemplify the cultural heritage of Encinitas and have been determined to be important cultural resources to the City.

3.3.2 Existing Conditions

ENCINITAS NORTH 101 CORRIDOR SPECIFIC PLAN

The early growth and development of the North Highway 101 Corridor is linked to water, transportation, and tourism. After the first footholds of a few early settlers, the coming of the railroad in the 1880s brought transportation links to the rest of California and the United States. Early subdivisions and land development begun but was limited by a scarce water supply. The

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establishment of Lake Hodges and the San Dieguito Irrigation District resulted in a reliable water source. By the mid-1920s, several land companies and developers were subdividing the land along the North Highway 101 Corridor. New residents further developed the area by establishing businesses such as agriculture, avocado and flower growing, and developing tourist services such as motor courts, motels and other roadside services. The cultural landscape of the North Highway 101 Corridor today features surviving examples of these land uses, such as motels and nurseries still featuring their original function in their original form, and structures the use of which has changed but the form remains relatively intact.

PAUL ECKE CENTRAL ELEMENTARY SCHOOL

The Paul Ecke Central Elementary School was originally called the Central School until its name changed in 1986 to Paul Ecke Central, after Paul Ecke Sr. (Cogstone 2025). Mr. Ecke owned two farms in Encinitas and Carlsbad, was cofounder of the American Florist Exchange market in Los Angeles, and was inducted into the Floriculture Hall of Fame in 1970.

Construction of the Central School was completed in May of 1929 and consisted of a single Mission Revival styled schoolhouse (currently referred to as the Old Schoolhouse) located on Union Street. A review of the United States Department of Agriculture aerial photographs and building plans provided by the District depict the development of the Central School campus from the 1930s to the early 2000s (Cogstone 2025). There are seven historic buildings in age on the project site, which include the following:

- Administration Building (Building A), built in 1947, Modern Style with Colonial Revival Elements
- Classroom/Kitchen (Classroom 200), built in 1953, Modern Style
- Old Schoolhouse, built in 1929, Mission Revival Style
- Multipurpose Room, built in 1962, Modern Style
- Classrooms (Classroom 300), built in 1968, Modern Style
- Classrooms (Classroom 400), built in 1953, Modern Style
- Media Center/Classrooms (Classroom 700), built in 1974, Modern Style

The seven buildings of historic age were evaluated for potential historic significance. Based on extensive research efforts and consultation with District representatives, the following two buildings are recommended eligible for listing in the NRHP and CRHR (Cogstone 2025):

- **Building A (offices and classrooms):** Built in 1947. Modern Style with Colonial Revival Style elements. This Building was designed by master architect Robert Rice Curtis of the architectural firm Kistner, Curtis, and Wright. This Building is recommended eligible for listing in the NRHP under Criterion C and CRHR Criterion 3 as a unique example of a work by a master architect.

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- **Old Schoolhouse:** Built in 1929. Mission Revival Style. The second schoolhouse constructed within Encinitas. The Old Schoolhouse was used as the District office for the District staff from 1969 until 1991. The Old Schoolhouse is recommended eligible for listing in the NRHP under Criterion A and the CRHR under Criterion 1, and NRHP Criterion C and CRHR under Criterion 3 as an exemplary representation of an architectural style.

The Classroom/Kitchen (Classroom 200), Multipurpose Room, Classrooms (Classroom 300 and Classroom 400), and Media Center/Classrooms (Classroom 700) are unremarkable representations of Modern Style architecture. The Multipurpose Room no longer maintains its original design or materials following a 2007 expansion project (Cogstone 2025). These buildings are associated with Clarence “Clyde” Hufbauer and Hufbauer, Humphrey, and Worthington Architects, Inc. While Mr. Hufbauer and his firm were well-respected and completed numerous projects for San Diego Unified School District, these buildings are not exemplary representations of this master architect’s large body of work, which reaches the level required for listing in the NRHP under Criterion C or the CRHR under Criterion 3 (Cogstone 2025).

ADDITIONAL HISTORICAL RESOURCES

Cottonwood Creek is a California Point of Historical Interest and is approximately 0.57 mile south of the project site (OHP 2026). Additionally, the Encinitas Boathouses, approximately 0.96 mile south of the project site, are listed on the NRHP (NPS 2026).

CULTURAL/NATURAL RESOURCES OVERLAY ZONE

The project site is not within the Cultural/Natural Resources Overlay Zone (Encinitas 2026a).

ENCINITAS REGISTER OF HISTORIC PLACES

The project site is not listed on the Encinitas Register of Historic Places. The closest historical resource, which is a Mills Act Contract property, is approximately 0.34 mile southeast of the project site at 221 Sunset Drive (Encinitas 2026b).

PALEONTOLOGICAL RESOURCES

According to the California Department of Conservation’s Compilation of Quaternary Surficial Deposits, the soils underlying the project site are Old Lacustrine, Playa, and Estuarine (Paralic) Deposits (Qol), aging from a late to middle Pleistocene epoch (DOC 2026). The University of California Museum of Paleontology Localities identified that 127 localities of the 1,780 localities in San Diego County are within the Pleistocene epoch (UCMP 2026).

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3.3.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, “Environmental Checklist Form,” of the CEQA Guidelines states that the proposed project would result in a significant impact on cultural resources if it would:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.
- c) Disturb any human remains, including those interred outside of dedicated cemeteries.
- d) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

3.3.4 Project Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

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 not listed on a local, state, or federal registry (Cogstone 2025; Encinitas 2026b; OHP 2026; NPS 2026). Additionally, as the proposed project would occur within the project site boundaries, the proposed project would not impact historical resources in the project area due to the distances of these resources.

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However, Building A and the Old Schoolhouse have been identified as being recommended eligible for listing in the NRHP and CRHR (Cogstone 2025).

BUILDING A

Building A is recommended eligible for listing in the NRHP under Criterion C and CRHR Criterion 3 as a unique example of a work by a master architect. Because the proposed project would demolish this Building, a Historic Building Survey (HABS)-like report was prepared for Building A, which provides thorough documentation of this Building to mitigate the loss of this structure (see Appendix 3.3-2). The HABS-like report will be kept on file with the District.

The HABS-like report indicated that Building A is a unique local example of the Modern Style with Colonial Revival Style elements, and that despite the alterations to the exterior and interior of the Building, overall, Building A appears to be in very good condition and closely reflects the original 1947 building design as drafted by the Master Architect Robert Rice Curtis (Cogstone 2026a).

While the HABS-like report thoroughly documents Building A, the proposed project would result in the total loss of this Building. Therefore, this impact would remain **significant and unavoidable**.

OLD SCHOOLHOUSE

The Old Schoolhouse is recommended eligible for listing in the NRHP under Criterion A and Criterion C, and CRHR under Criterion 1 and Criterion 3 (Cogstone 2025). A Secretary of the Interior (SOI) Compatibility Assessment for the Old Schoolhouse was prepared to evaluate the Old Schoolhouse's compatibility with the SOI's Standards for the Treatment of Historic Properties (see Appendix 3.3-3).

The proposed project would perform major updates and retrofits to the interior and minor upgrades to the exterior of the Old Schoolhouse. The Old Schoolhouse's overall architectural style (Mission Revival Style) would not be changed as the proposed project would maintain key features of the footprint, red tile roof, stucco exterior, bell tower, and bell (Cogstone 2026b).

However, upon reviewing the proposed improvements for the Old Schoolhouse, Cogstone determined that multiple alterations, as follows, would have a notable negative impact on the Old Schoolhouse's character defining features and overall integrity of design, workmanship, and feeling, which are not compatible with the SOI Standards for Rehabilitation:

- **Primary Entrance.** The primary entrance configuration of the Old Schoolhouse is a major character defining feature and a distinct feature of the Old Schoolhouse's design. Removal and/or permanent blockage of this entrance (to be used as a reading nook) would represent a major adverse impact to the Old Schoolhouse's historic design, workmanship, and feeling.

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In addition, as the Old Schoolhouse's primary entrance faces Union Street and is visible to the public, any major alterations to the Old Schoolhouse's north façade would have a significant impact on its visual appearance.

- **Canted Bay Window.** The canted bay window and brick apron is a distinct character defining feature of the Old Schoolhouse. Removal of this feature would have a significant adverse impact on the Old Schoolhouse's historic design, workmanship, and feeling.
- **HVAC.** The addition of the HVAC units/mechanical equipment would negatively impact the visual character of this portion of the Old Schoolhouse's design, as seen from the public right-of-way.
- **Interior Alterations.** The proposed interior alterations, with the exception of the installation of the reading nook, would not impact the Old Schoolhouse's eligibility for listing as a historic resource.

The District and its architects considered several design options for the proposed improvements to the Old Schoolhouse, which were ultimately dismissed as such improvements would have required seismic retrofits, which would have been infeasible for the District due to cost.

Justification for the proposed improvements is as follows:

- **Primary Entrance**
 - **Educational Program Needs and Building Functionality.** The existing north-facing entry portico on Union Street is located in a portion of the Old Schoolhouse being reprogrammed for modern instructional use such as a media center or learning commons. The current configuration of this entry no longer supports the interior layout or program needs.
 - **Campus Security and Safety Improvements.** The existing portico is located outside the campus's secure perimeter and is not an active point of entry. Its sheltered portico, location, and visibility from Union Street make it an attractive nuisance, encouraging loitering and unauthorized gathering. Due to the adjusted drive access to the project site, the front of the Old Schoolhouse is no longer able to be used as an entrance, and this has also diminished the Old Schoolhouse's overall appearance from Union Street. By removing this entrance, the proposed project improves the following:
 - Campus security and perimeter control
 - Supervision and visibility
 - Alignment with District-wide safety protocols
 - **Accessibility Compliance.** The existing Union Street entry is not Americans with Disability (ADA)-compliant and would require substantial reconstruction to meet current

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accessibility standards. Instead, accessible entry points are being integrated elsewhere in the design, where they can be effectively supervised and safely accessed, reducing disruption to historic fabric and improving usability.

- **Contextual and Material Sensitivity.** While the existing entry configuration would be removed, key materials would be protected in place or salvaged, including the transom window and brick veneer, where feasible. The proposed project would ensure that any visible modifications remain consistent with the Old Schoolhouse's Mission Revival aesthetic, using the following:
 - Compatible stucco finishes
 - Appropriate detailing
 - Proportions and rhythms reflective of the original structure

■ **Canted Bay Window**

- **Educational Program Needs and Building Functionality.** The existing canted bay window is in a portion of the Old Schoolhouse that is being reprogrammed for modern instructional or library/media use. Its current configuration limits interior layout flexibility, circulation, and visual supervision. Most notably, the Old Schoolhouse's finish floor is significantly higher than the adjacent exterior grade, creating a physical and visual barrier for students and staff. This condition restricts universal access and diminishes supervision from both inside and outside the Old Schoolhouse. Additionally, replacing the bay window with a code-compliant, full-size door with a transom allows for the following:
 - ADA accessibility
 - Improved emergency egress
 - A more functional, flexible, and connected learning space
- This new door would serve as the primary entry into the reprogrammed library, directly supporting the Old Schoolhouse's new educational function
- **Safety, Accessibility, and Circulation Improvements.** The new entry at this location is critical to the reoriented campus-wide circulation plan, which aims to improve student safety, supervision, and accessibility. This access point:
 - Provides a secure, supervised, and accessible entrance to the Old Schoolhouse
 - Improves student flow and visibility
 - Aligns with district-wide safety and equity priorities
- **Contextual and Material Sensitivity.** The new double-door opening is being designed with attention to scale, proportion, and rhythm to remain consistent with the Mission Revival style of the Old Schoolhouse. The transom window above the doors is intended

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to match existing transom windows. If feasible, a salvaged window from the main entry door on the front (north) elevation would be reused in this location to retain material continuity. Materials and finishes would match or complement the original palette, including stucco textures and window detailing consistent with the Old Schoolhouse's historic character.

■ HVAC

- **Modern Building Performance Requirements.** To meet contemporary educational and energy performance standards, the proposed project must incorporate new HVAC and mechanical systems into the Old Schoolhouse, which currently lacks the infrastructure to support indoor environmental quality needs for today's learning environments. The mechanical systems being added are:
 - Required for code compliance (Title 24, CALGreen)
 - Aligned with District-wide sustainability and thermal comfort goals
 - Critical for ensuring indoor air quality, temperature control, and occupant wellness
- **Design and Location Considerations.** Alternate mechanical strategies (e.g., roof-mounted equipment or interior closets) were evaluated but found to be either structurally incompatible with the Old Schoolhouse or disruptive to the interior's usable space. The mechanical units have been carefully located to minimize visibility and disruption to the Old Schoolhouse's façade as follows:
 - Placement is limited to the least prominent portions of the exterior wall (no student access needed here and there is room for landscaping).
 - Units are being grouped, sized, and screened to reduce visual impact.
 - Where feasible, units would be shielded by existing architectural features, decorative fencing, or landscaping.
- **Security, Access, and Maintainability.** Exterior wall installation was selected not only to reduce structural and cost impacts, but also to:
 - Avoid roof penetrations that would damage historic materials.
 - Keep systems accessible without disrupting the school day or library operations.

Therefore, while the improvements to the Old Schoolhouse are needed for improved access, safety, and functionality, these improvements would have a significant impact on the historic integrity and character-defining features of the Old Schoolhouse, which would result in the loss of its recommended historic eligibility for listing on the NRHP and CRHR. Therefore, impacts are **potentially significant**.

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Impact CUL-1: Improvements to the Old Schoolhouse would result in the loss of its recommended historic eligibility for listing on the NRHP and CRHR.

Mitigation Measure CUL-1: Prior to any construction activities at, and adjacent to, the Old Schoolhouse, the District shall retain a qualified architectural historian to prepare a Historic Building Survey (HABS)-like report, which shall thoroughly document the historic significance of the Old Schoolhouse through a field survey and photographs. The HABS-like report shall be kept on file with the District. Construction activities at, and adjacent to, the Old Schoolhouse shall commence after the HABS-like report is completed.

Significance with Mitigation: Significant and unavoidable impact. Even with the implementation of Mitigation Measure CUL-1, impacts to the Old Schoolhouse would remain **significant and unavoidable** due to the loss of the historic integrity and character-defining features of the Building.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

The project site has previously been disturbed by grading, paving, and development of the existing Paul Ecke Central Elementary School campus. Therefore, the surface and subsurface have been previously disturbed. The proposed project would be confined to the boundaries of the project site. Project construction would involve ground-disturbing activities across the project site. The proposed project would require demolition, ground clearing, grading, utility trenching, and other ground-disturbing activities.

Although the likelihood of discovering archaeological resources onsite is low given that the project site is fully developed, it is possible that the proposed project may unearth previously unknown or unrecorded archaeological resources. Therefore, impacts are **potentially significant**.

Impact CUL-2: Ground-disturbing activities on site have the potential to unearth and cause a substantial impact to unknown archaeological resources.

Mitigation Measure CUL-2: If archaeological resources are encountered during ground-disturbing activities, work in the immediate area shall cease, and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find(s). If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted and will be reported to the Encinitas Union School District. If significant Native American cultural resources are discovered, the

3.3 CULTURAL AND PALEONTOLOGICAL RESOURCES

archaeologist on-call shall contact the applicable Native American tribal contact(s). If requested by the Native American tribe(s), District, or archaeologist on-call shall, in good faith, consult on the discovery and its disposition (e.g., avoidance, preservation, reburial, return of artifacts to tribe).

Significance with Mitigation: Less-than-significant impact with mitigation. In the event unknown archaeological resources are discovered during ground-disturbing activities, Mitigation Measure CUL-2 would ensure archaeological resources are preserved to the extent feasible.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

The proposed project would require earthwork activities such as grading, drill holes, and utility trenching. The project site is developed with the existing Paul Ecke Central Elementary School campus. Although unlikely, the potential exists that human remains may be encountered. California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98 mandate procedures in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, California Health and Safety Code Section 7050.5 requires that if human remains are discovered within a project site, disturbance of the site shall remain halted until the county coroner has conducted an investigation into the circumstances, manner, and cause of death, and made recommendations concerning the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his/her authority and if the coroner has reason to believe the human remains to be of Native American origin, he/she shall contact, by telephone within 24 hours, the NAHC. While it is unlikely that ground-disturbing activities associated with the proposed project could result in the discovery of human remains, compliance with existing law would ensure that significant impacts to human remains would not occur. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less-than-significant impact.

d) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The project site is entirely developed, and no unique geologic features exist on the project site. The proposed project would not directly or indirectly destroy unique geologic features. No impact would occur.

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Paleontological resources or fossils are remains of ancient plants and animals that can provide scientifically significant information about the history of life on Earth. This paleontological sensitivity is determined by rock type, the history of the geologic unit in producing significant fossils, and fossil localities that are recorded from that unit.

As described in Section 3.3.2, *Existing Conditions*, a University of California Museum of Paleontology Localities search identified 127 localities of the Pleistocene epoch, like the project site, within San Diego County (UCMC 2026, DOC 2026). Additionally, the project site has been previously disturbed by development. Although unlikely due to the developed nature of the project site, the potential to unearth unknown paleontological resources during ground-disturbing activities exist. Therefore, impacts would be **potentially significant**.

Impact CUL-3: Ground-disturbing activities on site have the potential to unearth and destroy unknown paleontological resources.

Mitigation Measure CUL-3: A qualified paleontologist shall be on-call in the event that paleontological resources are found during ground-disturbing activities. The paleontologist shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossils. The paleontologist shall be empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner.

Significance with Mitigation: Less-than-significant impact with mitigation. In the event unknown paleontological resources are discovered during ground-disturbing activities, Mitigation Measure CUL-3 would ensure paleontological resources are preserved to the extent feasible.

3.3.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to cultural resources?

Development of the proposed project and related projects have the potential to encounter and/or potentially degrade cultural and paleontological resources, and human remains. However, similar to the proposed project, each related project would be expected to comply with PRC Section 15064.5, perform site-specific cultural analyses, implement mitigation measures if needed, and comply with other applicable regulatory compliance measures. The project site does not contain any known cultural or paleontological resources or human remains, nor does it contain any officially designated historic resources. However, because the proposed project would include improvements that would result in the loss of historic integrity

3.3 CULTURAL AND PALEONTOLOGICAL RESOURCES

and character-defining features, as well as ground-disturbing activities, the proposed project would require Mitigation Measure CUL-1 through Mitigation Measure CUL-3 to minimize impacts to the extent feasible, which would reduce the potential for the proposed project to contribute to cumulative impacts to cultural and paleontological resources. Nonetheless, the proposed project's loss of historic resources that are recommended eligible for listing would be considered cumulatively considerable and would be **significant and unavoidable**.

3.3.6 References

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3.4 ENERGY

This section of the Draft Environmental Impact Report (DEIR) describes the regulatory framework and existing conditions related to energy and the potential impacts of the proposed project. A summary of the relevant regulatory framework and existing conditions is followed by a discussion of potential impacts and cumulative impacts related to implementation of the proposed project.

Section 21100(b)(3) of the California Environmental Quality Act (CEQA) requires that an EIR includes a detailed statement with mitigation measures proposed to minimize significant effects on the environment, including but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. Appendix F of the CEQA Guidelines states that, to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered in an EIR, to the extent relevant and applicable to the project. Appendix F further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the project description, environmental setting, and impact analysis portions of technical sections, as well as through mitigation measures and alternatives.

In accordance with Appendix F and Appendix G of the CEQA Guidelines, this DEIR includes relevant information and analyses that address the energy implications of the proposed project. This section summarizes the proposed anticipated energy needs, impacts, and conservation measures associated with development and activities under the proposed project. The information in this section and other aspects of the proposed project's energy implications are also discussed in Section 3.2, *Air Quality*; Section 3.5, *Greenhouse Gas Emissions*; and Section 3.8, *Transportation*, of this Draft EIR.

3.4.1 Regulatory Framework

FEDERAL

Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 was established in response to the 1973 oil crisis. The Act created the Strategic Petroleum Reserve, established vehicle fuel economy standards, and prohibited the export of United States crude oil (with a few limited exceptions). It also created Corporate Average Fuel Economy (CAFE) standards for passenger cars starting in model year 1978. The CAFE standards are updated periodically to account for changes in vehicle technologies, driver behavior, and/or driving conditions.

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The federal government issued new CAFE standards in 2012 for model years 2017 to 2025 that required a fleet average of 54.5 miles per gallon (mpg) for model year 2025. However, on March 30, 2020, the United States Environmental Protection Agency (EPA) finalized an updated CAFE and greenhouse gas (GHG) emissions standards for passenger cars and light trucks and established new standards, covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient Vehicles Final Rule for Model Years 2021 through 2026.

On December 21, 2021, under direction of Executive Order (EO) 13990 issued by President Biden, the National Highway Traffic Safety Administration (NHTSA) repealed Safer Affordable Fuel Efficient Vehicles Rule Part One, which had preempted state and local laws related to fuel economy standards. In addition, on March 31, 2022, the NHTSA finalized new fuel standards in response to EO 13990. Fuel efficiency under the standards proposed would increase 8 percent annually for model years 2024 to 2025 and 10 percent annual for model year 2026. Overall, the new CAFE standards require a fleet average of 49 mpg for passenger vehicles and light trucks for model year 2026, which would be a 10 mpg increase relative to model year 2021 (NHTSA 2022).

On June 7, 2024, NHTSA announced final CAFE standards for passenger cars and light trucks built in model years 2027 to 2031 and final fuel efficiency standards for heavy-duty pickup trucks and vans built in model years 2030 to 2035. The final rules establish standards that would require an industry fleetwide average of approximately 50.4 mpg for passenger cars and light trucks in model year 2031, by increasing fuel economy by 2 percent year over year for passenger cars (model years 2027–2031) and for light trucks (model years 2029–2031). For heavy-duty pickup trucks and vans, the final rule would increase fuel efficiency at a rate of 10 percent per year (model years 2030–2032) and 8 percent per year (model years 2033–2035) (NHTSA 2024).

On June 11, 2025, the NHTSA published the final rule, “Resetting the Corporate Average Fuel Economy Program.” This interpretive rule issued by the NHTSA does not immediately change or reverse current fuel economy standards; however, the rule clarifies the NHTSA’s interpretation of its obligations for CAFE standards stemming from the Energy Policy and Conservation Act of 1975 and the Energy Independence and Security Act of 2007. The rule asserts that some regulations, such as those established under previous presidential administrations, improperly considered electric vehicles (EVs) when identifying the “maximum feasibility” average fuel economy level upon which CAFE standards are developed, thereby establishing a legal foundation for future rollbacks of CAFE standards (NHTSA 2025).

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (Public Law 110-140) seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal

government. The Act sets increased CAFE Standards; the Renewable Fuel Standard; appliance energy-efficiency standards; building energy-efficiency standards; and accelerated research and development tasks on renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration (US EPA 2024).

Energy Policy Act of 2005

Passed by Congress in July 2005, the Energy Policy Act includes a comprehensive set of provisions to address energy issues. This Act includes tax incentives for energy conservation improvements in commercial and residential buildings, fossil fuel production and clean coal facilities, and construction and operation of nuclear power plants, among other things. Subsidies are also included for geothermal, wind energy, and other alternative energy producers.

National Energy Policy

Established in 2001 by the National Energy Policy Development Group, the National Energy Policy is designed to help the private sector and state and local governments promote dependable, affordable, and environmentally sound production and distribution of energy for the future. Key issues addressed by the energy policy are energy conservation, repair and expansion of energy infrastructure, and ways of increasing energy supplies while protecting the environment.

Natural Gas Pipeline Safety Act of 1968

The Natural Gas Pipeline Safety Act of 1968 authorizes the United States Department of Transportation to regulate pipeline transportation of flammable, toxic, or corrosive natural gas and other gases as well as the transportation and storage of liquefied natural gas. The Pipeline and Hazardous Materials Safety Administration within the United States Department of Transportation develops and enforces regulations for the safe, reliable, and environmentally sound operation of the nation's 2.6-million-mile pipeline transportation system.

STATE

Warren-Alquist Act

Established in 1974, the Warren-Alquist Act created the California Energy Commission (CEC) in response to the energy crisis of the early 1970s and the State's unsustainable growing demand for energy resources. The CEC's core responsibilities include advancing state energy policy, encouraging energy efficiency, certifying thermal power plants, investing in energy innovation, developing renewable energy, transforming transportation, and preparing for energy emergencies. The Warren-Alquist Act is updated annually to address current energy needs and issues, and its latest edition was in January 2023.

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California Energy Commission

The CEC is the state's principal energy planning organization, created to meet the energy challenges facing the state in response to the 1973 oil embargo. The CEC is charged with the following six basic responsibilities when designing state energy policy:

- Forecast statewide electricity needs.
- License power plants to meet those needs.
- Promote energy conservation and efficiency measures.
- Develop renewable energy resources and alternative energy technologies.
- Promote research, development, and demonstration.
- Plan for and direct the state's response to energy emergencies.

California Public Utilities Commission

In September 2008, the California Public Utilities Commission (CPUC) adopted the Long-Term Energy Efficiency Strategic Plan, which provides a framework for energy efficiency in California through the year 2020 and beyond. It articulates a long-term vision, as well as goals for each economic sector, identifying specific near-term, mid-term, and long-term strategies to assist in achieving these goals. This Plan sets forth the following four goals, known as Big Bold Energy Efficiency Strategies, to achieve significant reductions in energy demand:

- All new residential construction in California will be zero net energy by 2020.¹
- All new commercial construction in California will be zero net energy by 2030.
- Heating, Ventilation and Air Conditioning (HVAC) will be transformed to ensure that its energy performance is optimal for California's climate.
- All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

With respect to the commercial sector, the Long-Term Energy Efficiency Strategic Plan notes that commercial buildings, which include schools, hospitals, and public buildings, consume more electricity than any other end-use sector in California. The commercial sector's five-billion-plus square feet of space account for 38 percent of the state's power use and over 25 percent of natural gas consumption. Lighting, cooling, refrigeration, and ventilation account for 75 percent of all commercial electric use, while space heating, water heating, and cooking account for over 90 percent of gas use. In 2006, schools and colleges were in the top five facility

¹ Zero net energy buildings are buildings that the total amount of energy used by the building on an annual basis is equal to or less than the amount of renewable energy created on the site.

types for electricity and gas consumption, accounting for approximately 10 percent of state's electricity and gas use (CPUC 2011).

The CPUC and CEC have adopted the following goals to achieve zero net energy levels by 2030 in the commercial sector:

Goal 1: New construction will increasingly embrace zero net energy performance (including clean, distributed generation), reaching 100 percent penetration of new starts in 2030.

Goal 2: 50 percent of existing buildings will be retrofitted to zero net energy by 2030 through achievement of deep levels of energy efficiency and with the addition of clean distributed generation.

Goal 3: Transform the commercial lighting market through technological advancement and innovative utility initiatives.

Renewable Portfolio: Carbon Neutrality Regulations

Senate Bills 1078, 107, X1-2, and Executive Order S-14-08

The California Renewables Portfolio Standard (RPS) was established in 2002 under Senate Bill (SB) 1078 and was amended in 2006, 2011, and 2018. The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. Initially under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. Executive Order S-14-08 was signed in November 2008, which expanded the state's Renewable Energy Standard to 33 percent renewable power by 2020. This standard was adopted by the California legislature in 2011 (SB X1-2). The CPUC is required to provide quarterly progress reports on progress toward RPS goals. This has accelerated the development of renewable energy projects throughout the state.

Senate Bill 350

Governor Jerry Brown signed SB 350 on October 7, 2015, which expands the RPS by establishing a goal of 50 percent of the total electricity sold to retail customers in California per year by December 31, 2030. In addition, SB 350 includes the goal to double the energy efficiency savings in electricity and natural gas final end uses (e.g., heating, cooling, lighting, or class of energy uses upon which an energy efficiency program is focused) of retail customers through energy conservation and efficiency. The Bill also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. SB 350 also provides for the transformation of the California Independent System Operator into

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a regional organization to promote the development of regional electricity transmission markets in the western states and to improve the access of consumers served by the California Independent System Operator to those markets, pursuant to a specified process.

Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100, which replaced the SB 350 requirements. Under SB 100, the RPS for publicly owned facilities and retail sellers consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Additionally, SB 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill also establishes an overall state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Senate Bill 1020

SB 1020 was signed into law on September 16, 2022. It requires renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent by 2040. Additionally, SB 1020 requires all state agencies to procure 100 percent of electricity from renewable energy and zero-carbon resources by 2035.

2023 Integrated Energy Policy Report

The CEC published the 2023 Integrated Energy Policy Report to identify pathways to deeply decarbonize the state's electricity system in response to meeting the SB 100 goal of zero-carbon by 2045 (CEC 2024). The report provides an analysis of electricity sector trends; building decarbonization and energy efficiency; zero-emission vehicles; energy equity; climate change adaptation; electricity reliability; natural gas assessment; and electricity, natural gas, and transportation energy demand forecasts. The aim is to leverage California's clean electricity system to decarbonize, or remove carbon from, other portions of the state's energy system. SB 1389 (Chapter 568, Statutes of 2002) requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery, distribution, electricity demand, and price to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety.

Energy Efficiency Regulations

2008 California Energy Action Plan Update

The 2008 Energy Action Plan Update provides a status update to the 2005 Energy Action Plan II, which is the State of California's principal energy planning and policy document. The update continues the original Energy Action Plan (adopted in 2003), describes a coordinated implementation plan for state energy policies, and identifies specific action areas to ensure that California's energy is adequate, affordable, technologically advanced, and environmentally sound. First-priority actions to address California's increasing energy demands are energy efficiency, demand response (i.e., reduction of customer energy usage during peak periods in order to address system reliability and support the best use of energy infrastructure), and the use of renewable sources of power. If these actions are unable to satisfy the increasing energy and capacity needs, the plan supports clean and efficient fossil-fired generation.

California Building Energy Code: Title 24, Part 6, Energy Efficiency Standards

Energy conservation standards for new residential and non-residential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 and most recently revised in 2024 (California Code of Regulations [CCR] Title 24, Part 6). Title 24 Part 6 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

In 2024, the CEC adopted the 2025 Building Energy Efficiency Standards, which were subsequently approved by the California Building Standards Commission. The 2025 standards become effective and replace the existing 2022 standards on January 1, 2026. The 2025 standards would require mixed-fuel single-family homes to be electric-ready to accommodate replacement of gas appliances with electric appliances. In addition, the new standards also include prescriptive photovoltaic system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers. The California Building Standards Code (CBSC) and the California Green Building Standards Code (24 CCR, Part 11, known as "CALGreen") undergo a triennial update with a goal to achieve zero net energy for new buildings by 2030.

California Building Code: Title 24, Part 11, Green Building Standards

On July 17, 2008, the California Building Standards Commission adopted CALGreen, the nation's first green building standards, as part of the CBSC. It includes mandatory requirements for new residential and nonresidential buildings throughout California. CALGreen is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective,

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healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The mandatory provisions of CALGreen became effective January 1, 2011, and were most recently updated in 2024 (2025 CALGreen update). The 2025 CALGreen update becomes effective on January 1, 2026, and provides updates to the residential and non-residential voluntary measures.

Overall, the code is established to reduce construction waste, make buildings more efficient in the use of materials and energy, and reduce environmental impact during and after construction. CALGreen contains requirements for construction site selection, stormwater control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for verifying that all building systems (e.g., heating and cooling equipment and lighting systems) are functioning at their maximum efficiency.

2006 Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601 through 1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances. They contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. These standards are updated regularly to allow consideration of new energy efficiency technologies and methods.

Off-Road Equipment and Transportation-Related Regulations

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model year 2017 through 2025 light-duty vehicles (also see the discussion on the update to the CAFE standards under the heading *Federal*, above). In January 2012, the California Air Resources Board (CARB) approved the Pavley Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of

standards. Under California's Advanced Clean Car program, by 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions (CARB 2017).

Title 13, Chapter 9, Article 4.8, Section 2449

Section 2449 of the California Code of Regulations, Title 13, Chapter 9, Article 4.8 was adopted on May 2, 2008, and limits non-essential idling of fleets to no more than five consecutive minutes at any location. This idling restriction applies to all vehicles in California with a diesel-fueled or alternative diesel-fueled off-road engine, unless a waiver provides sufficient justification that such idling is necessary.

Senate Bill 375

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations. In the San Diego region, the San Diego Association of Governments (SANDAG) serves as the regional metropolitan planning organization and transportation planning agency.

Assembly Bill (AB) 1007 State Alternative Fuels Plans

AB 1007 (Chapter 371, Statutes 2005) required the CEC to prepare a state plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other state, federal, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative, nonpetroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

Executive Order N-79-20

On September 23, 2020, EO N-79-20 was issued, which sets a timeframe for the transition to zero-emissions (ZE) passenger vehicles and trucks in addition to off-road equipment. It directs CARB to develop and propose the following:

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- Passenger vehicle and truck regulations requiring increasing volumes of new ZEVs (zero-emission vehicles) sold in California toward the target of 100 percent of in-state sales by 2035.
- Medium- and heavy-duty vehicle regulations requiring increasing volumes of new ZE trucks and buses sold and operated in California toward the target of 100 percent of the fleet transitioning to ZEVs by 2045 everywhere feasible, and for all drayage trucks to be ZE by 2035.
- Strategies to achieve 100 percent zero emissions from all off-road vehicles and equipment operations in California by 2035, in cooperation with other State agencies, the EPA, and local air districts.

On August 25, 2022, CARB adopted the Advanced Clean Cars II (ACC II) regulations that codifies the EO goal of 100 percent of in-state sales of new passenger vehicles and trucks be ZE by 2035. Starting in year 2026, ACC II requires that 35 percent of new vehicles sold be ZE or plug-in hybrids (CARB 2022). However, on May 22, 2025, the U.S. Senate voted to revoke the waiver granted by the Biden administration for the ACC II program through congressional resolution (House Joint Resolution 88). On June 12, 2025, President Trump signed the resolution, which formally nullified ACC II. Currently, implementation of ACC II is unknown.

Energy Storage

California has set ambitious long-term goals for energy storage beyond 2026 to support its clean energy and climate goals. The state aims to reach 100 percent carbon-free electricity by 2045, which will require significant investment in renewable energy sources like wind and solar, as well as energy storage technologies to balance the variability of these sources.

The California Independent System Operator (CAISO) has a total energy storage capacity of more than 3,160 megawatts (MW) as of June 2022 (CAISO 2022). This includes both large-scale and distributed energy storage systems such as batteries, pumped hydroelectric storage, and thermal storage. CAISO is responsible for managing the electricity grid for much of California, and it has set a target of adding 3,300 MW of additional energy storage capacity by 2024 to support the integration of more renewable energy sources like wind and solar. As part of SB 100, load serving entities (LSE) were required to procure no less than 1.3 gigawatts (GW) of energy storage capacity by 2020, and 3 GW by 2030. Additionally, the CPUC has established a target of 15 GW of energy storage capacity by 2030 (CPUC 2022).

The Integrated Resource Plan

CAISO develops a coordinated grid management plan to integrate the generation and storage capacities of LSEs, called the Integrated Resource Plan (IRP). The IRP is a comprehensive planning document that outlines CAISO's forecasts for electricity demand, supply, and

transmission needs over a 20-year planning horizon, as well as its strategies for integrating renewable energy resources and other grid services to meet those needs. The plan is developed in collaboration with LSEs, regulators, and other stakeholders, and is updated periodically to reflect changes in the energy landscape and evolving policy goals. Overall, the IRP plays a critical role in ensuring the reliability and resilience of California's electricity grid as the state continues to transition to a cleaner and more sustainable energy system.

When an individual battery energy storage (BES) facility or generation infrastructure (i.e., solar panels) comes online in California, it is typically included in the IRP through a process known as the Interconnection Queue. The Interconnection Queue is managed by the CAISO, which oversees the operation of the state's electricity grid.

The Interconnection Queue

The Interconnection Queue is an application process that functions as a waiting list of proposed electricity generation and storage projects that are seeking to connect to the grid. When a new BES facility or generation infrastructure is proposed, the developer submits an application to CAISO to request an interconnection to the grid. CAISO evaluates the application to ensure that the facility meets technical and operational requirements, such as voltage regulation and frequency response, and that it can be integrated effectively into the grid.

Once the BES facility or generation infrastructure is approved by CAISO, it is assigned a point of interconnection on the grid, and its output is added to the IRP as a resource that can provide electricity and other grid services such as frequency regulation or ramping support. The facility is then dispatched by CAISO based on its bids into the day-ahead and real-time electricity markets, and its output is used to help balance supply and demand on the grid in real-time.

Overall, the Interconnection Queue is an important mechanism for integrating new BES facilities and other electricity resources into the California grid, and for ensuring that the grid remains reliable and resilient as the state continues to transition to a cleaner and more sustainable energy system.

REGIONAL

San Diego Association of Governments

Regional Plan

The SANDAG 2021 Regional Plan, which incorporates the 2050 Regional Transportation Plan/Sustainable Communities Strategy, provides a planned vision for the region's transportation system through 2050. The 2021 Regional Plan also incorporates a Sustainable Communities Strategy, as required by SB 375. This includes implementation of a Transportation Demand Management strategy to help local governments reduce energy consumption SANDAG

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2021). In August 2025, SANDAG released the 2025 Regional Plan, which is currently under public review at the time of drafting this Draft EIR. The 2025 Regional Plan's Sustainable Communities Strategy target for the region is to achieve a 19.3 percent reduction in GHG emissions by 2035 based on 2005 levels (SANDAG 2025).

Regional Energy Strategy

The Regional Energy Strategy (RES) serves as the energy policy blueprint for the region through 2050 (SANDAG 2014). The RES establishes long-term goals in 11 topic areas, including energy efficiency, renewable energy, distributed generation, transportation fuels, land use and transportation planning, border energy issues, and the green economy. Goals under the RES include the following:

- Pursue a comprehensive building retrofit program to improve efficiency and install renewable energy systems.
- Create financing programs to pay for projects and improvements that save energy.
- Use the SANDAG–San Diego Gas and Electric (SDG&E) Local Government Partnership to help local governments identify opportunities and implement energy savings, both at government facilities and throughout the communities.
- Support land use and transportation planning strategies that reduce energy use and GHG emissions.
- Support planning for electric charging and alternative fuel infrastructure.
- Support the use of existing unused reclaimed water to decrease the amount of energy needed to meet the water needs of the San Diego region.

3.4.2 Existing Conditions

ELECTRICITY AND NATURAL GAS

Electricity is quantified using kilowatt (kW) and kilowatt-hours (kWh), and natural gas is measured in British thermal units (BTU). The volumetric billing unit used for natural gas delivered to customers is typically expressed in hundreds of cubic feet (cft), which is equal to approximately 103,800 BTU (EIA 2024). A kW is a measure of 1,000 watts of electrical power, and a kWh is a measure of electrical energy equivalent to a power consumption of 1,000 watts for one hour. The kWh is commonly used as a billing unit for energy delivered to consumers by electric utilities.

San Diego Gas and Electric

San Diego County is served by SDG&E, which provides energy services to more than 3.7 million customers (i.e., 1.4 million accounts) in San Diego County and portions of southern Orange County (SDG&E 2025). The utility provider has a diverse power production portfolio composed of a variety of renewable and non-renewable sources. Energy production typically varies by season and by year. Regional electricity loads tend to be higher in the summer because higher summer temperatures drive increased demand for air conditioning. In contrast, natural gas loads are higher in the winter because the colder temperatures drive increased demand for natural gas heating (EIA 2020).

In 2023, the most recent year with RPS data available, more than 41 percent of the electricity SDG&E supplied was from renewable sources (SDG&E 2024). Table 3.4-1, *San Diego Gas and Electric and State of California Power Mix in 2023*, outlines the SDG&E power mix in 2023 compared to the power mix for the state (CEC 2023a). In 2023, SDG&E customers used 21,249 gigawatt hours of electricity and 4,493 million therms of natural gas (CEC 2025a, 2025b).

Table 3.4-1 San Diego Gas and Electric and State of California Power Mix in 2023

Energy Resources	2023 SDG&E Power Mix	2023 California Power Mix
Renewable	41.4%	36.9%
Biomass & Biowaste	0.7%	2.1%
Geothermal	0.0%	4.8%
Hydroelectric	0.1%	1.8%
Solar	22.6%	17.0%
Wind	18.0%	11.2%
Coal	0.0%	1.8%
Large Hydroelectric	0.2%	11.7%
Natural Gas	58.4%	36.6%
Nuclear	0.0%	9.3%
Other	0.0%	0.1%
Unspecified Power ¹	0.0%	3.7%
TOTAL	100.0%	100.0%

Source: SDG&E 2025.

Notes:

1. Unspecified power is electricity that has been purchased through open market transactions and is not traceable to a specific generation source.

Table 3.4-2, *Electricity and Natural Gas Consumption in the San Diego Gas and Electric Service Area in 2024*, outlines the breakdown of electricity and natural gas usage by sector in the

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SDG&E service area. Residential and commercial uses account for 79 percent of electricity use and 46 percent of natural gas use.

Table 3.4-2 Electricity and Natural Gas Consumption in the San Diego Gas and Electric Service Area in 2024

Sector	Electricity (Gwh)	Natural Gas (Million Therms)
Agriculture and Water Pump	413	3.54
Commercial	7,468	179.04
Industry	1,365	32.71
Mining and Construction	192	4.83
Residential	5,332	278.92
Streetlight	78	--
Transportation, Communications, & Utilities	1,938	22.91

Source: CEC 2025a, 2025b.

Existing Energy Use

The existing campus consumes electricity and natural gas energy associated with its buildings and fuel energy from trips to the project site.

3.4.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, Environmental Checklist Form, of the CEQA Guidelines states that the proposed project would result in a significant impact related to energy if it would:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.
- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

To determine whether the proposed project would result in wasteful, inefficient, or unnecessary consumption of energy resources, this analysis utilizes the guidance provided in Appendix F, Energy Conservation, of the CEQA Guidelines as well as the analytical precedent set by *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) (75 Cal.App.5th 63, 164-168).

According to Appendix F of the CEQA Guidelines, CEQA analyses should consider energy conservation goals, including decreasing overall per capita energy consumption; decreasing reliance on fossil fuels such as coal, natural gas, and oil; and increasing reliance on renewable energy sources. In *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) (75 Cal.App.5th 63, 164-168), the Appellate Court ruled that the analysis of wasteful, inefficient, and unnecessary energy consumption was inadequate because it did not consider whether additional renewable energy features could be added to the project.

The proposed project would be considered to result in a potentially significant impact if it would result in wasteful, inefficient, or unnecessary consumption of energy resources. Considering the guidance provided by Appendix F of the CEQA Guidelines and the Appellate Court decision in *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) (75 Cal.App.5th 63, 164-168), the following energy conservation goals are considered in determining whether the proposed project could result in wasteful, inefficient, or unnecessary consumption of energy resources:

- Decrease overall per capita energy consumption.
- Decrease reliance on fossil fuels such as coal, natural gas, and oil.
- Increase reliance on renewable energy sources.

It is important to note that the previously mentioned energy conservation goals are not utilized herein as bright-line significance thresholds and are instead used as an informative guide in assessing whether the proposed project could result in a potentially significant energy impact. In other words, even though a project may result in an increase in per capita energy consumption, that does not necessarily mean that the consumption of that energy would be wasteful, inefficient, or unnecessary, because the consumption of energy alone does not constitute the wasteful, inefficient, or unnecessary use of energy resources. Because different land use types consume different types of energy resources at different rates depending on that occupancy's operational objectives and energy needs, comparing the per capita energy consumption of the proposed project against the aggregated residential and non-residential energy consumption data for the county is informative but not determinative of whether that energy consumption would be wasteful, inefficient, or unnecessary. Therefore, this analysis focuses on whether the use of that energy resource is carried out in a wasteful, inefficient, or unnecessary manner in the context of the Appendix F energy conservation goals and explores whether mitigation may be warranted to ensure that the use of energy resources is not considered wasteful, inefficient, or unnecessary.

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METHODOLOGY

Energy use associated with the proposed project includes electricity and fuel consumption associated with construction equipment and vehicles during construction activities and electricity consumption associated with the proposed buildings. Trips associated with the relocation of students to the Park Dale Lane El Camino Creek elementary school campuses would also consume transportation energy during the duration of construction activities. Implementation of the proposed project would not increase student capacity and would not result in generation of new vehicle trips. Thus, operation of the proposed project would also not result in the consumption of transportation energy.

Energy use during construction is evaluated qualitatively since the proposed project does not propose any activities or the use of any equipment that would be considered atypical for the construction process. The trips and fuel usage associated with trips to the temporary school locations for Paul Ecke Central students are also evaluated since these trips are temporary and represent a minor increase in fuel use.

Operational building energy consumption estimates utilize the California Emissions Estimator Model (CalEEMod version 2022.1) default energy (i.e., electricity and natural gas) rates. The increase in electricity consumption for the all-electric building design was calculated using a conversion factor of 3,412 BTU per kWh.

3.4.4 Project Impact Analysis

-
- a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?**
-

The following discussion assesses 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 electric-powered equipment for interior construction and architectural coatings. It is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws) and

lighting, which would result in minimal electricity usage during construction activities. Therefore, project-related construction activities would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant.

Natural Gas Energy

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

Transportation Energy

Transportation energy use during construction of the proposed project would come from delivery vehicles, haul trucks, and construction employee vehicles. In addition, transportation energy demand would come from use of off-road construction equipment. It is anticipated that the majority of off-road construction equipment, such as those used during demolition, site preparation, and grading, 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. Thus, 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 are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with the California Code of Regulations, Title 13, Article 4.8, Chapter 9, Section 2449. Furthermore, construction trips would also not result in unnecessary use of energy since the project site is centrally located and is served by numerous regional freeway systems (e.g., I-5) that provide the most direct routes from various areas of the region.

Trips associated with the temporary relocation of students to the Park Dale Lane and El Camino Creek elementary school campuses would also consume transportation energy, including gasoline, compressed natural gas, electricity, and diesel from passenger vehicles and school buses. These trips would occur concurrently with construction activities and cease at the end of construction. The distances to these elementary school campuses are 3 miles and 2.3 miles to the project site, respectively. Therefore, the distances driven from the project site and surrounding attendance area to these campuses would not result in a significant increase in fuel use over existing conditions. Similar to construction-associated fuel use, this energy use would be temporary and would not require expanded energy supplies or the construction of new infrastructure.

Thus, energy use during construction of the proposed project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant.

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LONG TERM IMPACTS DURING OPERATION

The proposed project would be designed to be all-electric. The proposed increase in electricity consumption from the proposed project is shown in Table 3.4-3, *Operation-Related Electricity Consumption*. While these results conservatively show the total increase in building and parking lot electricity consumption, the existing buildings and facilities at the project site currently consume natural gas and electricity, which are not accounted for in these calculations.

Table 3.4-3 Operation-Related Electricity Consumption

Land Use	Electricity (kWh/Year)
Buildings	532,928.99
Parking Lot	10,266.72
Total	543,196

Source: CalEEMod Version 2022.1 (Appendix 3.2-1)

Note: kWh = kilowatt-hour.

Calculations reflect a conversion of the default natural gas consumption to electricity.

Electrical service to the project site would continue to be provided by SDG&E through connections to existing electrical lines. As shown in Table 3.4-3, the new electricity demand from the project site would be 543,196 kilowatt-hours per year. However, the proposed project would be subject to the more stringent California Building Energy Efficiency Standards compared to the existing buildings on the project site, which require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials and photovoltaic energy capture systems.

Additionally, the most recent updates to CALGreen require that school sites incorporate measures to mitigate heat-island effects, emphasizing expanded vegetation and long-term tree shading. Whereas previous code cycles allowed compliance through reflective paving or shade structures with minimal tree planting, the current standards require quantifiable canopy coverage—typically targeting shading of at least half of pedestrian and play-area hardscape within 15 years—alongside increased vegetated open space using climate-appropriate plantings. The proposed project would meet and exceed these updated requirements through its “school in a garden” design, which incorporates extensive tree planting, native and drought-tolerant landscapes, and shaded outdoor learning and circulation spaces. This landscape approach not only provides compliance with the CALGreen heat-island reduction provisions but also reinforces the District’s commitment to sustainability, student wellness, and climate-responsive design.

Additionally, energy consumption associated with operation of the proposed project would largely be similar to existing conditions. The proposed project would result in no permanent net increase in trips to the project site. Additionally, the stricter building energy efficiency standards adhered to by the proposed project would likely result in higher energy efficiency for the project buildings when compared to the existing buildings. Therefore, operation of the proposed project would not result in wasteful, inefficient, or unnecessary electricity demands. Operation of the proposed project would result in a **less-than-significant** impact related to energy.

Significance without Mitigation: Less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

This impact analysis evaluates consistency of the proposed project with California's Renewable Portfolio Standard (RPS) Program.

Renewable Portfolio Program

The state's electricity grid is transitioning to renewable energy under California's 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 33 percent renewable energy by 2020 (SB X1-2), 40 percent by 2024 (SB 350), 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, which would require the installation of a photovoltaic energy capture system. 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**.

Significance without Mitigation: Less than significant.

3.4.5 Cumulative Impact Analysis

The cumulative energy impacts are considered in the context of the growth from the proposed project combined with potential growth in the SDG&E service area.

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Would the project have a cumulative effect related to energy?

The proposed project's energy requirement and energy use efficiencies would not substantially affect energy resources, supplies, and capacity, nor would they affect peak and base period demand of energy, including energy in the forms of electricity and transportation fuel use. The proposed project would comply with applicable energy standards, including the California Building Standards Commission and CALGreen to reduce energy consumption, which aligns with the state's goals for carbon neutrality. Cumulative development projects would similarly be required to comply with state and local requirements that prevent the wasteful, inefficient, or unnecessary use of energy.

Furthermore, cumulative projects in the SDG&E service area would also comply with the applicable energy efficiency standards. Accordingly, the proposed project would not be cumulatively considerable, and cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.4.6 References

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3.5 GREENHOUSE GAS EMISSIONS

This section of the Draft Environmental Impact Report (DEIR) describes the potential impacts related to greenhouse gas (GHG) emissions that are associated with the proposed project. This section describes the regulatory framework and existing conditions, identifies criteria used to determine impact significance, provides an analysis of the potential GHG emission impacts, and identifies feasible mitigation measures that could mitigate any potentially significant impacts. GHG emissions modeling is included in Appendix 3.2-1, *Air Quality and Greenhouse Gas Emissions Modeling*, of this DEIR.

The following are definitions for terms used throughout this section:

- **Greenhouse gases (GHG)** refers to gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.
- **Global warming potential (GWP)** is the metric used to describe how much heat a molecule of a GHG absorbs relative to a molecule of carbon dioxide (CO₂) over a given period of time (20, 100, and 500 years). CO₂ has a GWP of 1.
- **Carbon dioxide-equivalent (CO₂e)** is the standard unit to measure the amount of GHGs in terms of the amount of CO₂ that would cause the same amount of warming. CO₂e is based on the GWP ratios between the various GHGs relative to CO₂.
- **MTCO₂e** indicates metric ton of CO₂e.
- **MMTCO₂e** indicates million metric tons of CO₂e.

3.5.1 Environmental Setting

GREENHOUSE GASES AND CLIMATE CHANGE

Human activities contribute to global climate change by adding large amounts of heat-trapping gases, known as GHG, to the atmosphere. The primary source of GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that may cause an increase in global average temperatures observed in the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur

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hexafluoride (SF₆), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).^{1,2}

The major GHGs are briefly described as follows:

- **Carbon dioxide (CO₂)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and also as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane (CH₄)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal landfills and water treatment facilities.
- **Nitrous oxide (N₂O)** is emitted during agricultural and industrial activities as well as during combustion of fossil fuels and solid waste.

GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have a stronger greenhouse effect than others. These are referred to as high GWP gases. The GWP of applicable GHG emissions are shown in Table 3.5-1, *Greenhouse Gas Emissions and Their Relative Global Warming Potential Compared to Carbon Dioxide*. The GWP is used to convert GHGs to CO₂-equivalence (CO₂e) to show the relative potential that different GHGs have to contribute to the greenhouse effect. For example, under IPCC's Fourth Assessment Report (AR4) GWP values for CH₄, a project that generates 10 metric tons (MT) of CH₄ would be equivalent to 250 MT of CO₂.³

¹ Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant because it is considered part of the feedback loop of changing radiative forcing rather than a primary cause of change.

² Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with close to 90 percent control as of 2023 due to existing programs that target reducing PM from diesel engines and burning activities (OEHHA 2023). However, State and national GHG inventories do not include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

³ CO₂-equivalence is used to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. The global warming potential of a GHG is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

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Table 3.5-1 Greenhouse Gas Emissions and their Relative Global Warming Potential Compared to Carbon Dioxide

GHGs	Fourth Assessment Report Global Warming Potential Relative to CO ₂ ¹	Fifth Assessment Report Global Warming Potential Relative to CO ₂ ¹	Sixth Assessment Report Global Warming Potential Relative to CO ₂ ¹
Carbon Dioxide (CO ₂)	1	1	1
Methane (CH ₄) ²	25	28	30
Nitrous Oxide (N ₂ O)	298	265	273

Source: IPCC 2007, IPCC 2014, IPCC 2023.

Note: The IPCC published updated GWP values in its Sixth Assessment Report (AR6) that reflect new information on atmospheric lifetimes of GHGs and an improved calculation of the radiative forcing of CO₂. However, GWP values identified in AR4 are used by CalEEMod for emissions calculations. Therefore, this analysis utilizes AR4 GWP values consistent with the latest version of CalEEMod.

1. Based on 100 year time horizon of the GWP of the air pollutant compared to CO₂.
2. The methane GWP includes direct effects and indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO₂ is not included.

Human Influence on Climate Change

For approximately 1,000 years before the Industrial Revolution, the number of GHGs in the atmosphere remained fairly constant. However, during the 20th century, scientists observed a rapid change in the climate and the quantity of climate change pollutants in the earth's atmosphere that is attributable to human activities.

The recent IPCC Sixth Assessment Report (AR6) summarizes the latest scientific consensus on climate change. It finds that atmospheric concentrations of CO₂ have increased by 50 percent since the Industrial Revolution and continue to increase at a rate of two parts per million each year. By the 2030s, and no later than 2040, the world will exceed 1.5 degrees Celsius (°C) warming (CARB 2022). These recent changes in the quantity and concentration of climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants (CAT 2006). In the past, gradual changes in the Earth's temperature changed the distribution of species, availability of water, and other conditions. Human activities are accelerating this process so that environmental impacts associated with climate change no longer occur in a geologic timeframe but within a human lifespan (IPCC 2001).

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are hard to

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predict. Projections of climate change depend heavily on future human activity. Therefore, climate models are based on different emission scenarios that account for historical trends in emissions and on observations of the climate record that assess the human influence of the trend and projections for extreme weather events. Climate-change scenarios are affected by varying degrees of uncertainty. For example, there are varying degrees of certainty on the magnitude of the trends for the following:

- Warmer and fewer cold days and nights over most land areas
- Warmer and more frequent hot days and nights over most land areas
- An increase in frequency of warm spells/heat waves over most land areas
- An increase in frequency of heavy precipitation events (or proportion of total rainfall from heavy rainfalls) over most areas
- Larger areas affected by drought
- Intense tropical cyclone activity increases
- Increased incidence of extreme high sea levels (excluding tsunamis)

Potential Climate Change Impacts for California

There is at least a greater than 50 percent likelihood that global warming will reach or exceed 1.5°C in the near-term, even for the very low GHG emissions scenario (IPCC 2023). Climate change is already impacting California and will continue to affect it for the foreseeable future. For example, the average temperature in most areas of California is already 1 degree Fahrenheit (°F) higher than historical levels, and some areas have seen average increases in excess of 2°F (Cal OES 2020). The California Fourth Climate Change Assessment identifies the following climate change impacts under a business-as-usual scenario, in which no new actions are taken to curb GHG emissions:

- Annual average daily high temperatures in California are expected to rise by 2.7°F by 2040, 5.8°F by 2070, and 8.8°F by 2100 compared to observed and modeled historical conditions. These changes are statewide averages. Heat waves are projected to become longer, more intense, and more frequent.
- Warming temperatures are expected to increase soil moisture loss and lead to drier seasonal conditions. Summer dryness may become prolonged, with soil drying beginning earlier in the spring and lasting longer into the fall and winter rainy season.
- High heat increases the risk of death from cardiovascular, respiratory, cerebrovascular, and other diseases.

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- Droughts are likely to become more frequent and persistent through 2100.⁴
- Climate change is projected to increase the strength of the most intense precipitation and storm events affecting California.
- Mountain ranges in California are already seeing a reduction in the percentage of precipitation falling as snow. Snowpack levels are projected to decline significantly by 2100 due to reduced snowfall and faster snowmelt. California's water storage system is designed with the expectation that snow will stay frozen for many months, and that as it melts, it will be stored in a series of reservoirs and dams, many of which are used to generate electricity. Changing waterfall patterns therefore impact both water supply and electricity supply.
- Marine layer clouds are projected to decrease, though more research is needed to better understand their sensitivity to climate change.
- Extreme wildfires (i.e., fires larger than 10,000 hectares or 24,710 acres) are expected to occur 50 percent more frequently. The maximum area burned statewide may increase 178 percent by the end of the century. Drought and reduced water supplies can increase wildfire risk.
- Exposure to wildfire smoke is linked to increased incidence of respiratory illness.
- Sea-level rise is expected to continue to increase erosion of beaches, cliffs, and bluffs (Cal OES 2020).

Global climate change risks to California are shown in Table 3.5-2, *Summary of Greenhouse Gas Emissions Risks to California*, and include impacts to public health, water resources, agriculture, coastal sea level, forest and biological resources, and energy.

⁴ Overall, California has become drier over time, with five of the eight years of severe to extreme drought occurring between 2007 and 2016, and with unprecedented dry years in 2014 and 2015 (OEHHA 2018). Statewide precipitation has become increasingly variable from year to year, with the driest consecutive four years occurring from 2012 to 2015 (OEHHA 2018).

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Table 3.5-2 Summary of Greenhouse Gas Emissions Risks to California

Impact Category	Potential Risk
Public Health Impacts	■ More frequent, hotter, and longer heat waves ■ Fewer extremely cold nights ■ Poor air quality made worse ■ Higher temperatures increase ground-level ozone levels ■ Deaths due to extreme heat
Water Resources Impacts	■ Decreasing Sierra Nevada snowpack ■ Challenges in securing adequate water supply ■ Potential reduction in hydropower ■ Loss of winter recreation
Agricultural Impacts	■ Increasing temperature ■ Increasing threats from pests and pathogens ■ Expanded ranges of agricultural weeds ■ Declining productivity ■ Irregular blooms and harvests
Coastal Sea-Level Impacts	■ Accelerated sea-level rise ■ Increasing coastal floods ■ Shrinking beaches ■ Worsened impacts on infrastructure
Forest and Biological Resource Impacts	■ Increased risk and severity of wildfires ■ Lengthening of the wildfire season ■ Movement of forest areas ■ Conversion of forest to grassland ■ Declining forest productivity ■ Increasing threats from pests and pathogens ■ Shifting vegetation and species distribution ■ Altered timing of migration and mating habits ■ Loss of sensitive or slow-moving species
Energy Demand Impacts	■ Potential reduction in hydropower ■ Increased energy demand

Source: CEC 2006, 2009; CCCC 2018; CNRA 2014; Cal OES 2020.

3.5.2 Regulatory Framework

This section summarizes key federal, state, regional, and local regulations and programs related to GHG emissions.

FEDERAL

United States Environmental Protection Agency

The United States Environmental Protection Agency (US EPA) announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat. The US EPA's final findings respond to the 2007 United States Supreme Court decision that GHG emissions fit within the Clean Air Act (CAA) definition of air pollutants. The findings, themselves, did not impose any emission reduction requirements but allowed the US EPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation (US EPA 2009a).

To regulate GHGs from passenger vehicles, the US EPA was required to issue an endangerment finding (US EPA 2009b). The finding identifies emissions of six key GHGs: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrochlorofluorocarbons (HCFCs), perfluorinated compounds (PFCs), and sulfur hexafluoride (SF₆). The first three are applicable to the proposed project's GHG emissions inventory because they constitute the majority of GHG emissions and, therefore, are the GHG emissions that should be evaluated as part of a project's GHG emissions inventory.

On January 20, 2025, the President of the United States signed an executive order, *Unleashing American Energy*, which directed the US EPA to eliminate the social cost of carbon calculation from any federal permitting or regulatory decision and submit recommendations on the legality and continued applicability of the 2009 endangerment finding, among other directives (White House 2025). On July 29, 2025, the US EPA released its proposal to rescind the 2009 endangerment finding and repeal all GHG emission standards for light-duty, medium-duty, and heavy-duty vehicles and engines pursuant to CAA Section 202(a) (US EPA 2025). The proposed rule would remove GHG-related provisions from 40 Code of Federal Regulations Part 600 without affecting provisions related to the Corporate Average Fuel Economy (CAFE) standards and fuel economy labeling (Vol. 90 Federal Register, No. 146, 36288.).

United States Mandatory Report Rule for Greenhouse Gases (2009)

In response to the endangerment finding, the US EPA issued the Mandatory Reporting of GHG Rule that requires substantial emitters of GHG emissions (e.g., large stationary sources) to report GHG emissions data. Facilities that emit 25,000 MTCO₂e per year are required to submit an annual report.

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Update to Corporate Average Fuel Economy Standards (2017 to 2035)

The federal government issued new CAFE standards in 2012 for model years 2017 to 2025, which required a fleet average of 54.5 miles per gallon (mpg) in 2025. On March 30, 2020, the US EPA finalized an updated CAFE and GHG emissions standards for passenger cars and light-duty trucks and established new standards covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021 to 2026.

On December 21, 2021, under direction of Executive Order (EO) 13990, the National Highway Traffic Safety Administration (NHTSA) repealed SAFE Vehicles Rule Part One, which had preempted state and local laws related to fuel economy standards. In addition, on March 31, 2022, the NHTSA finalized new fuel standards that will increase fuel efficiency by 8 percent annually for model years 2024 to 2025 and 10 percent annually for model year 2026. Overall, the new CAFE standards require a fleet average of 49 mpg for passenger vehicles and light-duty trucks for model year 2026, which will be a 10 mpg increase relative to model year 2021 (NHTSA 2022).

On June 7, 2024, NHTSA announced final CAFE standards for passenger cars and light trucks built in model years 2027 to 2031 and final fuel efficiency standards for heavy-duty pickup trucks and vans built in model years 2030 to 2035. The final rules establish standards that would require an industry fleetwide average of approximately 50.4 mpg for passenger cars and light trucks in model year 2031, by increasing fuel economy by 2 percent year over year for passenger cars (model years 2027–2031) and for light-duty trucks (model years 2029–2031). For heavy-duty pickup trucks and vans, the final rule would increase fuel efficiency at a rate of 10 percent per year (model years 2030–2032) and 8 percent per year (model years 2033–2035) (NHTSA 2024).

On June 11, 2025, the NHTSA published the final rule, “Resetting the Corporate Average Fuel Economy Program.” This interpretive rule issued by the NHTSA does not immediately change or reverse current fuel economy standards; however, the rule clarifies the NHTSA’s interpretation of its obligations for CAFE standards stemming from the Energy Policy and Conservation Act of 1975 and the Energy Independence and Security Act of 2007. The rule asserts that some regulations, such as those established under previous presidential administrations, improperly considered electric vehicles (EVs) when identifying the “maximum feasibility” average fuel economy level upon which CAFE standards are developed, thereby establishing a legal foundation for future rollbacks of CAFE standards (NHTSA 2025).

Multipollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles

In 2024, the US EPA issued a final rule, Multipollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles, that sets new, more protective standards to reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with

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model year 2027 (US EPA 2024a). The final rule builds on US EPA's final standards for federal GHG emissions standards for passenger cars and light trucks for model years 2023 through 2026 and leverages advances in clean car technology to help improve public health from vehicle emissions. These standards will phase in over model years 2027 through 2032. For light-duty vehicles, the standards are projected to result in an industry-wide average target for the light-duty fleet of 85 grams/mile (g/mile) of CO₂ in model year 2032, representing a nearly 50 percent reduction in projected fleet average emissions target levels relative to the existing model year 2026 standards (US EPA 2024b). The medium-duty vehicle standards are projected to result in an average target of 274 g/mile of CO₂ by model year 2032, representing a 44 percent reduction in projected fleet average emissions target levels relative to the existing model year 2026 standards (US EPA 2024b). Overall, US EPA projects that cumulative CO₂ reductions as a result of the new standards are approximately 7.2 billion metric tons over the life of the program (US EPA 2024b). Implementation of these standards is currently uncertain as the US EPA is currently reconsidering the 2009 endangerment finding and the related GHG emissions regulations.

STATE

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in Executive Order (EO) S0305, Assembly Bill (AB) 32, AB 1279, Senate Bill (SB) 32, EO B3015, and SB 375.

Executive Order S-03-05

EO S-03-05, signed June 1, 2005, set the following GHG reduction targets for the state: 2000 levels by 2010, 1990 levels by 2020, and 80 percent below 1990 levels by 2050.

Assembly Bill 32, Global Warming Solutions Act (2006)

Commonly known as its legislative bill number (AB 32), this act was signed on August 31, 2006, to reduce California's contribution of GHG emissions. AB 32 follows the 2020 tier of emissions-reduction targets established in EO S0305. The California Air Resources Board (CARB) prepared the 2008 Scoping Plan to outline a plan to achieve the GHG emissions reduction targets of AB 32.

Executive Order B-30-15

EO B-30-15, signed on April 29, 2015, set a goal of reducing GHG emissions in the state to 40 percent of 1990 levels by year 2030. EO B-30-15 also directed CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires state agencies to implement measures to meet the interim 2030 goal as well as the long-term goal for 2050 in EO S-03-05. It also requires the Natural Resources Agency to conduct triennial updates of the

3.5 GREENHOUSE GAS EMISSIONS

California adaptation strategy, Safeguarding California, to ensure climate change is accounted for in state planning and investment decisions.

Senate Bill 32 and Assembly Bill 197

In September 2016, SB 32 and AB 197 were signed, making the EO B-30-15 goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires CARB to prioritize direction emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

Executive Order B-55-18

EO B-55-18, signed September 10, 2018, sets a goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.” EO B-55-18 directs CARB to work with relevant state agencies to ensure future scoping plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions should be offset by equivalent net removals of CO₂e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Assembly Bill 1279

AB 1279, signed by Governor Newsom in September 2022, codifies the carbon neutrality targets of EO B-55-18 for year 2045 and sets a new legislative target for year 2045 of 85 percent below 1990 levels for anthropogenic GHG emissions. CARB was required to update the Scoping Plan to identify and recommend measures to achieve the net-zero and GHG emissions-reduction goals.

2022 Climate Change Scoping Plan Update

CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (Scoping Plan) on December 15, 2022, which lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the state’s anthropogenic (human-caused) GHG emissions (CARB 2022). The Scoping Plan was updated to address the carbon neutrality goals of EO B-55-18 and the ambitious GHG reduction target as directed by AB 1279. Previous scoping plans focused on specific GHG reduction targets for California’s industrial, energy, and transportation sectors—to meet 1990 levels by 2020, and then the more aggressive 40 percent below that for the 2030 target. This Scoping Plan expands on earlier scoping plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. Carbon neutrality takes it one step further by expanding actions to capture and store carbon, including through natural and working lands and mechanical technologies, while drastically reducing anthropogenic sources of carbon pollution at the same time.

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The path forward was informed by the recent Sixth Assessment Report of the IPCC and the measures would achieve 85 percent below 1990 levels by 2045 in accordance with AB 1279. CARB’s 2022 Scoping Plan identifies strategies, as shown in Table 3.5-3, *Priority Strategies for Local Government Climate Action Plans*, that would be most impactful at the local level for ensuring substantial progress toward the state’s carbon neutrality goals.

Table 3.5-3 Priority Strategies for Local Government Climate Action Plans

Priority Area	Priority Strategies
Transportation Electrification	Convert local government fleets to zero-emission vehicles (ZEV) and provide electric vehicle (EV) charging at public sites.
	Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (e.g., building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans).
Vehicle Miles Traveled (VMT) Reduction	Reduce or eliminate minimum parking standards.
	Implement complete streets policies and investments, consistent with general plan circulation element requirements.
	Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, and other approaches.
	Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking.
	Implement parking pricing or transportation demand management pricing strategies.
	Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (e.g. increasing allowable density of the neighborhood).
	Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert “greenfield” land to urban uses (e.g., green belts, strategic conservation easements).
Building Decarbonization	Adopt all-electric new construction reach codes for residential and commercial uses.
	Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (e.g., Energy Star-rated equipment and equipment controllers).
	Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances.

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Table 3.5-3 Priority Strategies for Local Government Climate Action Plans

Priority Area	Priority Strategies
	Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing).
	Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings).

Source: CARB 2022.

For residential and mixed-use development projects, CARB recommends this first approach to demonstrate that these land use development projects are aligned with state climate goals, based on the attributes of land use development that reduce operational GHG emissions while simultaneously advancing fair housing. As described in Section 3.5.4, *Standards for Analysis*, the same project attributes outlined in the Scoping Plan for consistency with state climate goals are used by the Bay Area Air Quality Management District (BAAQMD) to assess GHG emissions impacts for residential and non-residential projects. Therefore, the Scoping Plan's project attributes for reducing GHG emissions for residential and mixed-use projects may also apply to other development types including school uses. These project attributes that reduce GHGs include the following:

- **Transportation Electrification.** Provide EV charging infrastructure that, at a minimum, meets the most ambitious voluntary standards in the California Green Building Standards Code (CALGreen) at the time of project approval.
- **Vehicle Miles Traveled Reduction**
 - Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).
 - Does not result in the loss or conversion of the state's natural and working lands.
 - Consists of transit-supportive densities (minimum of 20 residential dwelling units/acre) or is in proximity to existing transit stops (within a half mile) or satisfies more detailed and stringent criteria specified in the region's Sustainable Communities Strategy (SCS).
 - Reduces parking requirements by:
 - Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet);
 - Providing residential parking supply at a ratio of <1 parking space per dwelling unit; or

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- For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.
- At least 20 percent of the units are affordable to lower-income residents.
- Result in no net loss of existing affordable units.
- **Building Decarbonization.** Use all electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.

The second approach to project-level alignment with state climate goals is net-zero GHG emissions. The third approach to demonstrating project-level alignment with state climate goals is to align with GHG thresholds of significance, which many local air quality management and air pollution control districts have developed or adopted (CARB 2022).

Senate Bill 375

SB 375, the Sustainable Communities and Climate Protection Act, was adopted in 2008 to connect the GHG emissions reduction targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (i.e., excluding emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce VMT and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPO). In the San Diego region, the San Diego Association of Governments (SANDAG) serves as the regional MPO and transportation planning agency.

Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target. CARB is required to update the targets for the MPOs every eight years. In June 2017, CARB released updated targets and technical methodology, and then released another update in February 2018, which became effective in October 2018. CARB staff began the target update process in 2024 with a public workshop and plans to conclude it in 2026 with Board approval of the new targets (CARB 2025).

The updated targets consider the need to further reduce VMT, as identified in the 2017 Scoping Plan Update, while balancing the need for additional and more flexible revenue sources to incentivize positive planning and action toward sustainable communities. The updated SB 375 targets are in units of percent per capita reduction in GHG emissions from automobiles and light-duty trucks compared to 2005. This excludes reductions anticipated from implementation of state technology and fuels strategies and any potential future state strategies such as statewide road user pricing. The updated targets call for greater per-capita GHG emission reductions from SB 375 than were currently in place, which for 2035 translates into updated

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targets that either match or exceed the emission reduction levels in the MPOs' currently adopted SCSs. CARB's updated targets result in an additional reduction of over 8 MMTCO_{2e} in 2035 compared to the prior targets (CARB 2018).

Transportation Sector Specific Regulations

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty to medium-duty vehicles) from 2009 through 2016 and was anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the US EPA. In 2012, the US EPA issued a Final Rulemaking that set even more stringent fuel economy and GHG emissions standards for model years 2017 through 2025 light-duty vehicles (also see the discussion in federal regulations under "*Update to Corporate Average Fuel Economy Standards [2017 to 2026]*"). In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of ZEVs into a single package of standards.

Executive Order S-01-07

On January 18, 2007, the state set a new low carbon fuel standard (LCFS) for transportation fuels sold in the state. EO S0107 set a declining standard for GHG emissions measured in CO_{2e} gram per unit of fuel energy sold in California. The LCFS required a reduction of 2.5 percent in the carbon intensity of California's transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The standard applied to refiners, blenders, producers, and importers of transportation fuels, and used market-based mechanisms to allow these providers to choose the most economically feasible methods for reducing emissions during the "fuel cycle."

Executive Order B-16-2012

On March 23, 2012, the state directed CARB, the California Energy Commission (CEC), the Public Utilities Commission, and other relevant agencies to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate ZEVs in major metropolitan areas, including infrastructure to support them (e.g., EV charging stations). EO B-16-2012 also directed the number of ZEVs in California's state vehicle fleet to increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles were ZE by 2015 and at least 25 percent by 2020. The EO also established a target for the transportation sector of reducing GHG emissions to 80 percent below 1990 levels.

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Executive Order N-79-20

On September 23, 2020, Governor Newsom signed EO N-79-20, establishing a goal that 100 percent of in-state sales of new passenger cars and trucks will be ZE by 2035. Additionally, the fleet goals for trucks are that 100 percent of drayage trucks are ZE by 2035, and 100 percent of medium- and heavy-duty vehicles in the state are ZE by 2045, where feasible. The EO's goal for the state is to transition to 100 percent ZE off-road vehicles and equipment by 2035, where feasible. Advanced Clean Cars II (ACC II) approved by CARB on August 25, 2022, codified the zero-emission vehicle transition goal established under EO-N-79-20 and set low-emission and zero-emission vehicle standards for model year 2026 through 2035 vehicles. However, on May 22, 2025, the U.S. Senate voted to revoke the waiver granted by the Biden administration for the ACC II program through congressional resolution (House Joint Resolution 88). On June 12, 2025, President Trump signed the resolution, which formally nullified ACC II. Currently, implementation of ACC II is unknown.

Renewables Portfolio: Carbon Neutrality Regulations

Senate Bills 1078, 107, and X1-2 and Executive Order S-14-08

A major component of California's Renewable Energy Program is the renewables portfolio standard established under SB 1078 (Sher) and SB 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent to reach at least 20 percent by December 30, 2010. EO S-14-08, signed in November 2008, expanded the state's renewable energy standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Eligible renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production decreases indirect GHG emissions from development projects because electricity production from renewable sources is generally considered carbon neutral.

Senate Bill 350

SB 350 (de Leon) was signed into law in September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100. Under SB 100, the RPS for public-owned facilities and retail sellers consists of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. SB 100 also established a new RPS requirement of 50 percent

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by 2026. Furthermore, the Bill establishes an overall state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under the Bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Senate Bill 1020

SB 1020 was signed into law on September 16, 2022. SB 1020 provides interim RPS targets (90 percent renewable energy by 2035 and 95 percent renewable energy by 2040) and requires renewable energy and zero-carbon resources to reach 100 percent clean electricity by 2045.

Energy Efficiency Regulations

California Building Energy Code: Title 24, Part 6, Energy Efficiency Standards

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 (Title 24, Part 6, of the California Code of Regulations [CCR]). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for the consideration and possible incorporation of new energy efficiency technologies and methods.

In 2024, the CEC adopted the 2025 Building Energy Efficiency Standards, which were subsequently approved by the California Building Standards Commission. The 2025 standards become effective and replace the existing 2022 standards on January 1, 2026. The 2025 standards would require mixed-fuel single-family homes to be electric-ready to accommodate replacement of gas appliances with electric appliances. In addition, the new standards also include prescriptive photovoltaic system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories), and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers. The California Building Standards Commission and CALGreen undergo a triennial update with a goal to achieve zero net energy for new buildings by 2030.

California Building Code: Title 24, Part 11, Green Building Standards

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (24 CCR, Part 11, known as "CALGreen") was adopted as part of the California Building Standards Code. CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material

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conservation, and internal air contaminants.⁵ The mandatory provisions of CALGreen became effective January 1, 2011, and were most recently updated in 2024 (2025 CALGreen update). The 2025 CALGreen update becomes effective on January 1, 2026, and provides updates to the residential and non-residential voluntary measures.

2006 Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601–1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances. Though these regulations are now often viewed as “business as usual,” they exceed the standards imposed by all other states, and they reduce GHG emissions by reducing energy demand.

Solid Waste Diversion Regulations

Assembly Bill 939: Integrated Waste Management Act of 1989

California’s Integrated Waste Management Act of 1989 (AB 939, Public Resources Code Section 40050 et seq.) set a requirement for cities and counties throughout the state to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the Act requires that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.

Assembly Bill 341

AB 341 (Chapter 476, Statutes of 2011) increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multi-family residential land uses. Section 5.408 of CALGreen also requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

Assembly Bill 1327

The California Solid Waste Reuse and Recycling Access Act (AB 1327, Public Resources Code Section 42900 et seq.) requires areas to be set aside for collecting and loading recyclable materials in development projects. The Act required the California Integrated Waste Management Board to develop a model ordinance for adoption by any local agency requiring

⁵ The green building standards became mandatory in the 2010 edition of the Code.

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adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.

Assembly Bill 1826

In October 2014, Governor Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses and multi-family residential dwellings with five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed with food waste.

Water Efficiency Regulations

Senate Bill X7-7

The 20x2020 Water Conservation Plan is a California initiative that aims to reduce urban per capita water use by 20 percent by 2020. It was issued by the California Department of Water Resources (DWR) in 2010 pursuant to SB 7, which was adopted during the 7th Extraordinary Session of 2009–2010 and therefore dubbed “SBX7-7.” SBX7-7 mandated urban water conservation and authorized DWR to prepare a plan implementing urban water conservation requirements, which DWR did through the 20x2020 Water Conservation Plan. In addition, it required agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 required urban water providers to adopt a water conservation target of a 20 percent reduction in urban per capita water use by 2020 compared to 2005 baseline use.

Assembly Bill 1881: Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act of 2006 (AB 1881) requires local agencies to adopt the updated DWR model ordinance or an equivalent. AB 1881 also requires CEC to consult with DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves, to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

Short-Lived Climate Pollutant Reduction Strategy

On September 19, 2016, the Governor signed SB 1383 to supplement the GHG reduction strategies in the Scoping Plan to consider short-lived climate pollutants, including black carbon and methane. Black carbon is the light-absorbing component of fine particulate matter produced during the incomplete combustion of fuels. SB 1383 required CARB, no later than

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January 1, 2018, to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The Bill also established targets for reducing organic waste in landfills. On March 14, 2017, CARB adopted the Short-Lived Climate Pollutant Reduction Strategy, which identifies the state's approach to reducing anthropogenic and biogenic sources of short-lived climate pollutants. Anthropogenic sources of black carbon include on- and off-road transportation, residential wood burning, fuel combustion (charbroiling), and industrial processes. According to CARB, ambient levels of black carbon in California are 90 percent lower than in the early 1960s, despite the tripling of diesel fuel use.⁶ In-use on-road rules were expected to reduce black carbon emissions from on-road sources by 80 percent between 2000 and 2020.

REGIONAL

Regional Transportation Plan/Sustainable Communities Strategy

San Diego Forward: The 2021 Regional Plan is the 2050 Regional Transportation Plan (RTP) prepared by SANDAG and adopted in December 2021 (SANDAG 2021). The 2025 Regional Plan has been released for public review at the time of drafting this DEIR.

The RTP establishes an implementation plan for how the region will grow over the next 30 years. Developed in accordance with California SB 375, the RTP includes a Sustainable Community Strategy (SCS). An SCS demonstrates how the region will meet its GHG-reduction targets through integrated land use, housing, and transportation planning. While the purpose of an SCS is to reduce GHG emissions due to mobile sources, it also results in a decrease in mobile sources of criteria pollutants. Enhanced public transit service combined with incentives for land use development that provides a better market for public transit will play an important role in the SCS.

The SCS focuses on the following five main strategies, referred to as the 5 Big Moves, which will result in a more efficient transportation system:

- **Complete Corridors** – Complete corridors act as the backbone of the entire regional transportation system, using technology, infrastructure improvements, pricing, and connectivity to support all forms of movement.

⁶ California Air Resources Board, March 2017, Short-Lived Climate Pollutant Reduction Strategy, <https://www.arb.ca.gov/cc/shortlived/shortlived.htm>.

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- **Transit Leap** – Transit leap offers people a network of high-capacity, high-speed, and high-frequency transit services that will incorporate new modes of transit while also providing improved existing services.
- **Mobility Hubs** – Mobility hubs are the centers of activity where a high concentration of people, destinations, and travel choices converge. They offer on-demand travel options and safe streets to enhance connections to high-quality transit while also making it easier for people to take short trips without needing a car.
- **Flexible Fleets** – Flexible fleets offer people a variety of on-demand, shared vehicles, including micro-transit, bikeshare, scooters, and other modes of transportation, to connect them to transit and make travel easy within Mobility Hubs.
- **Next Operating System (OS)** – Next OS refers to an integrated digital platform that ties the transportation system together. Next OS enables the transportation system to be managed in real time so that people can be connected immediately to the modes of transportation that work best for them for any given situation and at any time.

3.5.3 Existing Conditions

CALIFORNIA'S GHG SOURCES AND RELATIVE CONTRIBUTION

In 2024, the statewide GHG emissions inventory was updated for 2000 to 2022 emissions using the GWPs in IPCC's AR4 and reported that California produced 371.1 MMTCO_{2e} GHG emissions in 2022 (2.4 percent lower than 2021 levels). The 2022 emissions data shows that California is continuing its established long-term trend of GHG emissions declines, despite the anomalous emissions trends from 2019 through 2021, due in large part to the impacts of the COVID-19 pandemic. In 2014, statewide GHG emissions dropped below the 2020 GHG Limit (AB 32 target for year 2020) and have remained below the limit since that time. Additionally, the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross state product) is declining (CARB 2024).

California's transportation sector was the single-largest generator of GHG emissions, producing 37.7 percent of the state's total emissions. Industrial sector emissions made up 19.6 percent, and electric power generation made up 16.1 percent of the state's emissions inventory. Other major sectors of GHG emissions include residential and commercial (10.6 percent), agriculture and forestry (8.0 percent), high GWP (5.7 percent), and recycling and waste (2.2 percent).

Emissions from the transportation sector decreased compared to 2021, primarily due to a greater share of fuels used for on-road transportation being produced from non-fossil resources. Industrial sector decreases from 2021 to 2022, most notably in the oil and gas production sector. Electricity emissions also decreased compared to 2021 from the continued

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growth of in-state solar generation and increases to in-state hydropower and imported wind power. High-GWP gases continue to replace ozone-depleting substances being phased out under the 1987 Montreal Protocol and emissions from this sector have been stable from 2020 to 2022 (CARB 2024).

PROJECT SITE

An elementary school currently operates on the project site. Operation of the elementary school generates GHG emissions from natural gas used for energy and heating, electricity usage, vehicle trips for employees and students, area sources such as building maintenance equipment and consumer cleaning products, water demand, wastewater generation, and solid waste generation.

3.5.4 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, Environmental Checklist Form, of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to GHG emissions if it would:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

THRESHOLD GUIDANCE

San Diego County Air Pollution Control District has not adopted thresholds or guidance for addressing GHG emissions. The latest guidance for evaluating GHG emissions on a County-level was released by the County of San Diego titled, *Guidelines for Determining Significance: Climate Change* (2018 Guidelines) (San Diego County 2018). In general, the guidelines to determine potential project impacts under the County's 2018 Guidelines are based on consistency with the adopted Climate Action Plan for the jurisdiction. However, school districts are not directly under the jurisdiction of the County. In addition, school districts are also neither under the jurisdictions of cities, and thus, the City of Encinitas Climate Action Plan would also not be directly applicable to the proposed project.

Therefore, consistency with the CARB 2022 Scoping Plan is used to evaluate GHG emissions impacts for the proposed project. The 2022 Scoping Plan lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the state's anthropogenic GHG emissions (CARB 2022). Based on Appendix D of the 2022 Scoping Plan, absent consistency with a qualified

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climate action plan, for residential and mixed-use development projects, CARB recommends demonstrating that these land use development projects are aligned with state climate goals for the three priority areas: 1) transportation electrification, 2) VMT reduction, and 3) building decarbonization. Projects would be determined to have a less-than-significant impact if they are designed to 1) be 100 percent electric (no natural gas), 2) provide electric vehicle charging spaces in conformance with the voluntary Tier 2 standards of the CALGreen, and 3) are consistent with locally adopted VMT thresholds.

As crafted in the 2022 Scoping Plan, the consistency with the priority areas approach is recommended for residential and mixed-used projects only. However, BAAQMD also utilizes a similar consistency approach to determine project-level GHG emissions impacts for residential and non-residential projects. BAAQMD's consistency approach also requires all-electric buildings with no natural gas connections, compliance with the latest CALGreen Tier 2 electric vehicle charging standards, and consistency with the locally adopted VMT thresholds. Per BAAQMD's CEQA Guidelines, and similar to the approach outlined in Appendix D of the 2022 Scoping Plan, the consistency approach represents the "fair share" of new residential and commercial projects in their contribution to the overall state goal of achieving carbon neutrality by 2045 (BAAQMD 2023). Thus, for purposes of this analysis, consistency with the 2022 CARB Scoping Plan priority areas are also utilized to determine potential GHG emissions impacts for the proposed project.

Mass Emissions and Health Effects

On December 24, 2018, in the case *Sierra Club et al. v. County of Fresno et al.* (Friant Ranch), the California Supreme Court determined that the EIR for the proposed Friant Ranch project failed to adequately analyze the project's air quality impacts on human health. The EIR prepared for the project, which involved a master planned retirement community in Fresno County, showed that project-related mass emissions would exceed the San Joaquin Valley Air Pollution Control District's regional significance thresholds. In its findings, the California Supreme Court affirmed the holding of the Court of Appeal that EIRs for projects must not only identify impacts to human health, but also provide an "analysis of the correlation between the project's emissions and human health impacts" related to each criteria air pollutant that exceeds the regional significance thresholds or explain why it could not make such a connection. In general, the ruling focuses on the correlation of emissions of toxic air contaminants and criteria air pollutants and their impact to human health.

In 2009, the US EPA issued an endangerment finding for six GHGs (i.e., CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) to regulate GHG emissions from passenger vehicles. The endangerment finding is based on evidence that shows an increase in mortality and morbidity associated with increases in average temperatures, which increase the likelihood of heat waves and ozone levels. While these identified effects, such as sea level rise and increase in extreme weather, can indirectly impact human health, neither the US EPA nor CARB has established ambient air quality

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standards for GHG emissions. The state's GHG reduction strategy outlines a path to avoid the most catastrophic effects of climate change. Yet the state's GHG reduction goals and strategies are based on the state's path toward reducing statewide cumulative GHGs, as outlined in AB 32, SB 32, AB 1279, and EO B-55-18.

METHODOLOGY

This GHG emissions evaluation was prepared in accordance with the requirements of CEQA to determine if significant GHG impacts are likely to occur as a result of the proposed project. GHG emissions modeling is included in Appendix 3.2-1, of this Draft EIR.

GHG emissions were calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1 and are shown for informational purposes. CalEEMod compiles an emissions inventory of construction emissions, area sources, indirect emissions from energy use, mobile sources, indirect emissions from waste disposal, and indirect emissions from water/wastewater. The proposed project would not result in a net permanent increase in transportation-related emissions and therefore, operational mobile emissions are not included. The proposed project would, however, result in a temporary increase in trips to the Park Dale Lane and El Camino Creek elementary school campuses during the duration of construction of the proposed project. Mobile source emissions associated with this temporary increase in trips were calculated and are also shown.

Life-cycle emissions are not included in this analysis because not enough information is available for the proposed project. Therefore, lifecycle GHG emissions would be speculative (LCI 2008).⁷ Additionally, black carbon emissions are not included in the GHG analysis because CARB does not include this short-lived climate pollutant in the state's AB 32/SB 32 inventory but treats it separately (CARB 2017).

⁷ 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 were 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 2009). Because the amount of materials consumed during the operation or construction phases of individual development projects 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.

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3.5.5 Project Impact Analysis

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

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 project does not generate enough GHG emissions on its own to influence global climate change; therefore, this section measures the project's contribution to the cumulative environmental impact associated with GHG emissions. As described in Section 3.5.4, *Standards for Analysis*, since the San Diego County Air Pollution Control District does not have an adopted GHG significance threshold, consistency with the CARB's 2022 Scoping Plan is used to evaluate GHG emissions. Quantified GHG emissions from short-term and long-term sources under the proposed project are provided for informational purposes.

EMISSIONS CALCULATIONS

Development of the proposed project would contribute to climate change through direct and indirect emissions of GHG from the construction activities needed to implement the proposed project, which would generate a short-term increase in GHG emissions. Short-term mobile emissions would also be generated by the trips associated with the relocation of Paul Ecke Central elementary school students to the Park Dale Lane and El Camino Creek elementary school campuses during construction of the proposed project.

Furthermore, the proposed project would also generate long-term increase in GHG emissions from energy use (i.e., electricity) and area sources (e.g., consumer cleaning products). Because the proposed project would not increase student enrollment when compared to existing conditions, it would result in no net increase of water and solid waste-related emissions and mobile-source emissions. All GHG emissions associated with the proposed project are shown in Table 3.5-4, *Project-Related Greenhouse Gas Emissions*.

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Table 3.5-4 Project-Related Greenhouse Gas Emissions

Source	GHG Emissions MTCO ₂ e/Year
Construction Emissions	
Construction 2026	258
Construction 2027	228
Total	486
Temporary Student Relocation Mobile Emissions¹	
2026 Annual (tons/year) ²	33
2027 Annual (tons/year) ³	39
Total	73
Annual Maximum (Construction & Temporary Mobile Emissions in 2026)	291
Total Short-Term Emissions	559
Operational Emissions	
Area	1
Energy	12
Total Long-Term Emissions	13

Source: CalEEMod, Version 2022.1.

Notes: MTCO₂e = metric ton of carbon dioxide equivalent

1. Mobile emissions associated with the temporary relocation of students to the Park Dale Lane and El Camino Creek elementary school campuses would generate emissions concurrently with construction activities occurring each construction workday during the school year.
2. Temporary mobile emissions during year 2026 would occur for 82 days. Therefore, the maximum daily emissions during summer (highest reported) are used to calculate the maximum annual emissions that would occur in 2026.
3. Temporary mobile emissions during year 2027 would occur for 98 days. Therefore, the maximum daily emissions during summer (highest reported) are used to calculate the maximum annual emissions that would occur in 2027

2022 CARB Scoping Plan

The best management practices (BMPs) approach, based on 2022 Scoping Plan, requires a project to evaluate consistency with three priority areas of the 2022 Scoping Plan: transportation electrification, VMT reduction, and building decarbonization. Table 3.5-5, *Project Consistency with Scoping Plan Priority Areas*, discusses the proposed project's consistency with the Scoping Plan's BMPs.

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Table 3.5-5 Project Consistency with Scoping Plan Priority Areas

Priority Area	Priority Area Attributes	Project Consistency
Transportation Electrification	Provide electric vehicle (EV) charging infrastructure that, at a minimum, meets the most ambitious voluntary standards in the California Green Building Standards Code at the time of project approval.	Consistent: The proposed project would install EV charging consistent with the most recent CALGreen voluntary Tier 2 standards for non-residential uses.
Vehicle Miles Traveled (VMT) Reduction	Meets local jurisdiction adopted SB 743 threshold for VMT.	Consistent: The proposed project would not result in a net increase in trips to the project site. Therefore, it would have a less than significant VMT impact, as discussed in Section 3.8, <i>Transportation</i> .
Building Decarbonization	Use all electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.	Consistent. As discussed in Section 3.4, <i>Energy</i> , the proposed buildings would be constructed to be all-electric and comply with the California Building Energy Efficiency Standards and CALGreen. The proposed project would not require natural gas infrastructure.

Source: CARB 2022.

As discussed in Table 3.5-5, the proposed project would comply with the three priority areas of the 2022 Scoping Plan that are applicable to the proposed project. Therefore, the proposed project would have **less-than-significant** impacts with respect to GHG emissions.

Significance without Mitigation: Less than significant.

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

Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and SANDAG's Regional Plan. A consistency analysis with these plans is presented below.

California Air Resources Board Scoping Plan

CARB's Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by SB 32, which is to reduce GHG emissions to 40 percent below 1990 emission levels by year 2030. CARB recently adopted the 2022 Scoping Plan to achieve the state's carbon neutrality goals under EO B-55-18. The CARB Scoping Plan is applicable to state

3.5 GREENHOUSE GAS EMISSIONS

agencies and is not directly applicable to cities/counties or individual projects (i.e., the Scoping Plan does not require a school district to adopt policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the state agencies outlined in the Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the LCFS and changes in the corporate average fuel economy standards (e.g., Pavley I and Pavley California Advanced Clean Cars program).

Construction of the proposed project would adhere to the programs and regulations identified by the Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32, SB 32, and AB 1279. Additionally, as noted in Table 3.5-5, the proposed project would be consistent with the priority areas identified in the 2022 Scoping Plan.

Therefore, the proposed project would be consistent with state efforts to reduce motor vehicle emissions and generate GHG emissions consistent with the reduction goals of AB 32, SB 32, and AB 1279. The proposed project would not obstruct implementation of the CARB Scoping Plan, and a **less-than-significant** impact would occur.

San Diego Association of Governments' 2021 Regional Plan

SANDAG adopted the 2021 Regional Plan in December 2021 which includes the region's SCS along with the RTP and Regional Comprehensive Plan. At the time of drafting this EIR, SANDAG has released the 2025 Regional Plan for public review but has not yet adopted this update.

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 involve a rebuild of an existing elementary school campus and would not result in new trips to the project site, as there would not be an increase in student or staff capacity. The proposed project would not change underlying zoning or uses on the project site. Thus, the proposed project would not interfere with SANDAG's ability to implement the regional strategies outlined in the 2021 Regional Plan. Furthermore, as discussed in Section 3.8, *Transportation*, the proposed project would have less-than-significant impacts with respect to VMT. The proposed project would not have the potential to interfere with the State of California or SANDAG's ability to achieve GHG reduction goals and strategies. Therefore, a **less-than-significant** impact would occur.

Significance without Mitigation: Less than significant.

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3.5.6 Cumulative Impact Analysis

Would the project have a cumulative effect related to greenhouse gas emissions?

Project-related GHG emissions are not confined to a particular air basin but are dispersed worldwide. Therefore, impacts under impact discussions (a) and (b) are not project-specific impacts to global warming, but the proposed project's contribution to this cumulative impact.

The proposed project is also consistent with other applicable state and local plans, including the CARB 2022 Scoping Plan and SANDAG 2021 Regional Plan as discussed in impact discussion b). Therefore, cumulative GHG impacts of the proposed project would be **less than significant**.

Significance with Mitigation: Less than significant.

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3.6 HAZARDS AND HAZARDOUS MATERIALS

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts of the Paul Ecke Central Elementary School Rebuild Project (proposed project) on human health and the environment due to exposure to hazardous materials or conditions associated with the project site, project construction, and project operations.

Appendix 3.6-1, *Phase I Environmental Site Assessment*, of this DEIR, includes an analysis of the project site's hazardous conditions prepared by Padre Associates. Appendix 3.6-2, *Title 5 School Facilities Evaluation*, of the DEIR, provides an assessment and supporting documentation of state's school facility standards applicable to modernization projects prepared by PlaceWorks. Appendix 3.6-3, *Pipeline Safety Hazard Assessment*, of the DEIR, evaluates potential exposure and fatality risk to staff and students from natural gas or hazardous liquid pipeline releases and the potential for flooding from large volume water pipelines prepared by PlaceWorks. Appendix 3.6-4, *Rail Safety Study*, of the DEIR, evaluates the actual or potential endangerment to school occupants from any incidents (derailments or other accidents) that could occur along rail lines prepared by PlaceWorks.

3.6.1 Regulatory Framework

Hazardous materials refer generally to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, or other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; schools; and households (e.g., cleaners, solvents, paints, and pesticides). Accidental releases of hazardous materials can occur from a variety of causes, including traffic, shipping, and industrial/warehouse accidents.

Federal; state; and local laws, regulations, plans, or guidelines related to hazards and hazardous materials that are applicable to the proposed project are summarized in this section.

FEDERAL

United States Environmental Protection Agency

The United States (US) Environmental Protection Agency (EPA) is the primary federal agency that regulates hazardous materials and waste. In general, the EPA works to develop and enforce regulations that implement environmental laws enacted by Congress. The agency is responsible for researching and setting national standards for a variety of environmental programs and delegates to states and tribes the responsibility for issuing permits and for monitoring and enforcing compliance. EPA programs promote handling hazardous wastes safely, cleaning up

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contaminated land, and reducing trash. Under the authority of the Resource Conservation and Recovery Act (RCRA) and in cooperation with state and tribal partners, the EPA's Waste Management Division manages a hazardous waste program, an underground storage tank (UST) program, and a solid waste program that includes development of waste reduction strategies such as recycling.

Title 26, Part 1926 of the Code of Federal Regulations

Title 26, Part 1926 of the Code of Federal Regulations (CFR) establishes standards for general safety and health provisions, occupational health and environmental controls, demolition, toxic and hazardous substances, and other aspects of construction work. For example, it establishes standards for general safety and health, such as development and maintenance of an effective fire protection and prevention program at jobsites. It also establishes standards for occupational health and environmental controls, such as for exposure to lead and asbestos.

Resource Conservation and Recovery Act

Federal hazardous waste laws are generally promulgated under the Resource Conservation and Recovery Act (RCRA) of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984. These laws provide for the "cradle to grave" regulation of hazardous wastes. Any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed of. The Department of Toxic Substances Control (DTSC) is responsible for implementing the RCRA program as well as California's own hazardous waste laws, which are collectively known as the Hazardous Waste Control Law. A Certified Unified Program Agency (CUPA) is a local agency that has been certified by CalEPA to implement the local Unified Program. The CUPA can be a county, city, or joint powers authority. A participating agency is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction on behalf of the CUPA. A designated agency is a local agency that has not been certified by CalEPA to become a CUPA but is the responsible local agency that would implement the six Unified Programs until they are certified. Currently, there are 81 CUPAs in California.

Comprehensive Environmental Response, Compensation and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 protects water, air, and soil resources from the risks created by past chemical disposal practices. This law is also called the Superfund Act and regulates sites on the National Priority List, which are called Superfund sites. The Act was intended to encompass the prevention of and response to uncontrolled hazardous substances releases. It provides mechanisms for reacting to emergencies and chronic hazardous material releases. In addition to procedures to prevent and remedy problems, it established a system for compensating appropriate individuals and assigning appropriate liability. It is designed to plan for and respond to failure in other

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regulatory programs and remedy problems resulting from action taken before the era of comprehensive regulatory protection.

Emergency Planning and Community Right-to-Know Act

The Emergency Planning Community Right-to-Know Act (EPCRA), also known as Title III of the Superfund Amendments and Reauthorization Act, was enacted in October 1986. This law requires any infrastructure at the state and local levels to plan for chemical emergencies. Reported information is made publicly available so that interested parties can be informed about potentially dangerous chemicals in their community. EPCRA Sections 301 through 312 are administered by the EPA's Office of Emergency Management. The EPA's Office of Information Analysis and Access implements the program in EPCRA Section 313. In California, Superfund Amendments and Reauthorization Act Title III is implemented through the California Accidental Release Prevention program.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 gives the EPA the authority to require reporting, record-keeping, testing requirements, and restrictions related to chemical substances and/or mixtures. TSCA addresses the production, importation, use, and disposal of specific chemicals, including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint. Title IV of the TSCA directs the EPA to regulate lead-based paint hazards.

TSCA Sections 402 and 404 require those engaged in lead abatements, risk assessments, and inspections in homes or child-occupied facilities before 1978 (e.g., daycare centers and kindergartens) to be trained and certified in specific practices to ensure accuracy and safety. TSCA Section 403, Residential Hazard Standards for Lead in Paint, Dust, and Soil, sets standards for dangerous lead levels in paint, household dust, and residential soil.

Hazardous Materials Transportation Act

The US Department of Transportation regulates hazardous materials transportation under CFR Title 49. California Highway Patrol and the California Department of Transportation are the state agencies with the primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. The California State Fire Marshal's Office has oversight authority for hazardous materials liquid pipelines. The California Public Utilities Commission has oversight authority for natural gas pipelines. These agencies also govern permitting for hazardous materials transportation.

Federal Response Plan

The Federal Response Plan of 1999 is a signed agreement among 27 federal departments and agencies and other resource providers, including the American Red Cross, that includes the following:

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- (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency
- (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act as well as individual agency statutory authorities
- (3) supplements other federal emergency operations plans developed to address specific hazards.

The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a Presidential declaration of a major disaster or emergency. The Federal Response Plan is part of the National Response Framework, which was most recently updated in October 2019.

Occupational Safety and Health Administration

The federal Occupational Safety and Health Act of 1970 authorizes each state (including California) to establish its own safety and health programs with the U.S. Department of Labor, Occupational Safety and Health Administration's (OSHA's) approval. The California Department of Industrial Relations regulates implementation of worker health and safety in California. California Division of Occupational Safety and Health (Cal/OSHA) enforcement units conduct on-site evaluations and issue notices of violation to enforce necessary improvements to health and safety practices. California standards for workers dealing with hazardous materials are in Title 8 of the California Code of Regulations (CCR); they include practices for all industries (General Industrial Safety Orders) and specific practices for construction and other industries. Workers at hazardous waste sites (or working with hazardous wastes that might be encountered during excavation of contaminated soil) must receive specialized training and medical supervision according to the Hazardous Waste Operations and Emergency Response regulations.

OSHA Regulation 29 CFR Standard 1926.62 regulates the demolition, renovation, or construction of buildings involving lead materials. Federal, state, and local requirements also govern the removal of asbestos or suspected asbestos-containing materials (ACMs), including the demolition of structures where asbestos is present. All friable (crushable by hand) ACMs and nonfriable ACMs subject to damage must be abated following all applicable regulations and prior to demolition.

STATE

California Environmental Protection Agency

CalEPA was created in 1991 by the governor's executive order. Six boards and departments fall under the CalEPA umbrella—Air Resources Board, Department of Resources Recycling and

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Recovery, Department of Pesticides Regulations, California DTSC, Office of Environmental Health Hazard Assessment, and State Water Resources Control Board—to create a cabinet-level voice for the protection of human health and the environment and to ensure the coordinated deployment of state resources. CalEPA oversees the unified hazardous waste and hazardous materials management regulatory program.

California Department of Toxic Substances Control

The DTSC is a department of CalEPA, which authorizes DTSC to administer the RCRA program in California to protect people from exposure to hazardous waste. The department regulates hazardous waste, cleans up existing contamination, and implements regulations to control and reduce the hazardous waste produced in California, primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law (California Health and Safety Code [HSC], Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (22 CCR Divisions 4 and 4.5). Permitting, inspection, compliance, and corrective action programs ensure that people who manage hazardous waste follow state and federal requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

DTSC's Brownfields Restoration and School Evaluation Branch is responsible for assessing, investigating, and cleaning up proposed school sites and existing school sites. The oversight is to ensure that selected properties are free of contamination or, if the properties were previously contaminated, that they have been cleaned up to a level that protects the students and staff who will occupy the new school. All proposed school sites and existing school sites that will receive state funding for acquisition or construction are required to go through an environmental review and cleanup process under DTSC's oversight.

Government Code Section 65962.5 (Cortese List)

Government Code Section 65962.5 requires, among other items, that the DTSC compile and update as appropriate, but at least annually, a list (Cortese List) of the following sites and submit the list to the Secretary for Environmental Protection:

- All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.
- All land designated as hazardous waste property or border zone property pursuant to former Article 11 (commencing with Section 25220) of Chapter 6.5 of Division 20 of the Health and Safety Code.
- All information received by the DTSC pursuant to Section 25242 of the Health and Safety Code on hazardous waste disposals on public land.

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- All sites listed pursuant to Section 25356 of the Health and Safety Code.

Government Code Section 65962.5 also requires the following:

- b) The State Department of Health Services shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Section 116395 of the Health and Safety Code.
- (c) The State Water Resources Control Board shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all of the following:
 - All underground storage tanks for which an unauthorized release report is filed pursuant to Section 25295 of the Health and Safety Code.
 - All solid waste disposal facilities from which there is a migration of hazardous waste and for which a California regional water quality control board has notified the Department of Toxic Substances Control pursuant to subdivision (e) of Section 13273 of the Water Code.
 - All cease and desist orders issued after January 1, 1986, pursuant to Section 13301 of the Water Code, and all cleanup or abatement orders issued after January 1, 1986, pursuant to Section 13304 of the Water Code, which concern the discharge of wastes that are hazardous materials.
- (d) The local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations, shall compile as appropriate, but at least annually, and shall submit to the Department of Resources Recycling and Recovery, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste. The Department of Resources Recycling and Recovery shall compile the local lists into a statewide list, which shall be submitted to the Secretary for Environmental Protection and shall be available to any person who requests the information.

California Occupational Health and Safety Administration

Occupational safety standards in federal and state laws minimize worker safety risks from both physical and chemical hazards in the workplace. Cal/OSHA is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials.

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California Building Code

The State of California provides a minimum standard for building design through the California Building Code (CBC), which is in 24 CCR Part 2. The 2025 CBC is based on the 2024 International Building Code but has been modified for California conditions. It is updated every three years, with the 2025 CBC being updated effective January 1, 2026. The CBC, as adopted by local cities or counties, may be further modified based on local conditions. Typical fire safety requirements of the CBC include installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

California Department of Forestry and Fire Protection

California Department of Forestry and Fire Protection (CAL FIRE) is dedicated to the fire protection and stewardship of over 31 million acres of California's wildlands. The Office of the State Fire Marshal supports CAL FIRE's mission to protect life and property through fire prevention engineering programs, law and code enforcement, and education. The Office of the State Fire Marshal provides for fire prevention by enforcing fire-related laws in state-owned or -operated buildings; investigating arson fires; licensing those who inspect and service fire protection systems; approving fireworks for use in California; regulating the use of chemical flame retardants; evaluating building materials against fire safety standards; regulating hazardous liquid pipelines; and tracking incident statistics for local and state government emergency response agencies. The California Fire Plan is the state's road map for reducing the risk of wildfire through planning and prevention to reduce firefighting costs and property losses, increase firefighter safety, and contribute to ecosystem health. The California Fire Plan is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE.

California Fire Code

The California Fire Code (CFC) is in 24 CCR Part 9. It is also updated every three years, with the 2025 CFC going into effect January 1, 2026. The 2025 CFC is based on the 2024 International Fire Code but has been modified for California conditions. The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Similar to the CBC, the CFC is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions.

California Governor's Office of Emergency Services

The California Governor's Office of Emergency Services (Cal OES) coordinates California's statewide response to disasters by managing the State Operations Center, directing mutual aid systems, and ensuring emergency agencies can support one another across jurisdictions. It oversees public safety communications, including 911 systems and deployable communication

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units, while also handling homeland security programs related to terrorism prevention, cybersecurity, and critical infrastructure protection. The agency leads disaster recovery by coordinating Federal Emergency Management Agency (FEMA) assistance and administering relief programs, and it works to reduce future risks through hazard mitigation projects. Additionally, Cal OES provides emergency management training, develops statewide emergency plans, and supports preparedness efforts for state, county, and local agencies.

Hazardous Materials Management Act

A hazardous material is any substance that possesses qualities or characteristics that could produce physical damage to the environment and/or cause deleterious effects upon human health (Title 22 of the CCR). The Hazardous Materials Management Act (Title 22 of the CCR) requires that businesses and public entities handling or storing certain amounts of hazardous materials prepare a hazardous materials business plan that includes an inventory of hazardous materials stored on site (previously specified quantities), an emergency response plan, and an employee training program. Businesses that use, store, or handle 55 gallons of liquid, 500 pounds of solid, or 200 cubic feet of compressed gas at standard temperature and pressure require a hazardous materials business plan. Plans must be prepared prior to facility operation and are reviewed/updated biennially (or within 30 days of a change).

California Accidental Release Prevention Program

California Accidental Release Prevention Program includes the Federal Accidental Release Prevention Program with certain additions specific to California and pursuant to Health and Safety Code Article 2, Chapter 6.95. The purpose of this program is to prevent the accidental release of regulated substances. Businesses using regulated substances exceeding a threshold quantity are evaluated under this program to determine the potential for and impacts of accidental releases. Depending on the potential hazards, business owners may be required to develop and submit a risk management plan.

Regulations for Hazardous Materials in Structures

Asbestos is regulated as a hazardous air pollutant under the Clean Air Act and as a potential worker safety hazard under the authority of the federal OSHA. Cal/OSHA considers ACM a hazardous substance when a bulk sample contains more than 0.1 percent asbestos by weight and requires a qualified contractor licensed to handle asbestos. Any activity that involves cutting, grinding, or drilling during building renovation or demolition or relocation of underground utilities could release friable asbestos fibers unless proper precautions are taken.

Lead is regulated as a hazardous material, and inorganic lead is regulated as a toxic air contaminant. Lead-containing paints, according to Cal/OSHA, are defined as paints reported with any detectable levels of lead by paint chip analysis (8 CCR Section 1532.1[d]). When

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disturbed for construction purposes, these surfaces are subject to Cal/OSHA exposure assessment requirements.

Several regulations and guidelines pertain to abatement of and protection from exposure to ACM and lead-based paint, as follows:

- Lead-based paint
 - 8 CCR Subchapter 4, Construction Safety Orders, Section 1532.1
 - 29 CFR 1926, Subpart D
- Asbestos
 - 8 CCR Subchapter 4, Section 1529
 - 29 CFR 1926, Subpart Z
 - 40 CFR 61, Subpart M

These rules and regulations provide exposure limits, exposure monitoring, respiratory protection, and good working practice for workers exposed to lead and ACM. In California, ACM and lead-based-paint abatement must be performed and monitored by contractors with appropriate certification from the California Department of Health Services. Health and Safety Code Sections 17920.10 and 105255 require lead to be contained during demolition activities.

Polychlorinated biphenyls (PCBs) were commonly used in the small capacitor in fluorescent light ballasts through 1979. PCB regulations are included in 40 CFR 761, which requires the material to be incinerated. The entire lighting fixture does not need special handling and disposal as long as the ballast (electrical box) is not leaking. The nonleaking ballasts can be removed and recycled or disposed of properly.

Hazardous Waste Control

HSC Division 20, Chapter 6.5, and 22 CCR Division 4.5, Environmental Health Standards for the Management of Hazardous Waste, address how hazardous waste must be handled, stored, transported, treated, and disposed. They provide an effective process for hazardous waste management planning at the local level to ensure adequate handling, storing, transporting, treating, and disposing of hazardous materials.

REGIONAL

San Diego County Emergency Operations Plan

The San Diego County Emergency Operations Plan (EOP) of September 2022 is a plan used by all key partner agencies within the county to prepare for, respond to, recover from, and mitigate against all hazards including natural disasters, technological incidents, terrorism and nuclear-

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related incidents. The plan also identifies sources of outside support, which might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies, and the private sector. The plan delineates operational concepts relating to various emergencies, identifies components of a comprehensive emergency management system and describes the overall responsibilities for protecting life and property, and assuring the overall wellbeing of the population. All jurisdictions within the operational area operate under the Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS). No single jurisdiction or agency has the capability and resources to address all disasters or major emergencies. The Unified San Diego County Office of Emergency Services was established for the purpose of providing and addressing disaster related problems on a regional basis (San Diego 2022).

Certified Unified Program Agency for San Diego County

The County of San Diego, Department of Environmental Health and Quality (DEHQ), Hazardous Materials Division (HMD) is the Certified Unified Program Agency (CUPA) for the County of San Diego.

A CUPA serves as an administrative agency that coordinates regulation of hazardous materials and waste in San Diego County, including the City of Encinitas (City). The CUPA oversees the following six programs: Aboveground Petroleum Storage Tank Program, California Accidental Release Prevention Program, Hazardous Materials Business Plan Program, Hazardous Materials Management and Inventory Program, Underground Storage Tank (UST) Program, and Hazardous Waste and Hazardous Waste Treatment Program. The goal of the Unified Program achieves consistency, consolidation and coordination in the regulation of these six programs through education, community and industry outreach, inspections, and enforcement (San Diego 2025).

McClellan-Palomar Airport Land Use Compatibility Plan

The McClellan-Palomar Airport Land Use Compatibility Plan provides for the orderly growth of the airport and the area surrounding the airport, and it safeguards the general welfare of the inhabitants within the vicinity of the airport and the public in general. The McClellan-Palomar Airport Land Use Compatibility Plan serves as a tool for the Airport Land Use Commission to use in fulfilling its duty to review land use plans and development proposals within the Airport Influence Area at the airport (SAN 2011).

LOCAL

Encinitas General Plan

The Encinitas General Plan provides the basis for the City's policies and represents the community's basic values, ideals, and aspirations. The General Plan establishes policies to guide

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development and conservation. The Public Safety Element of the City of Encinitas General Plan includes the following policies related to hazards and hazardous materials (Encinitas 1995):

- **Policy 1.17.** In order to protect the health and safety of the residents of Encinitas and surrounding communities, the City shall control the development of hazardous waste facilities as required in Chapter 30.57 of the Municipal Code. The City shall also participate in programs to reduce the amounts of hazardous wastes being generated in the San Diego region, as provided in the adopted San Diego County Hazardous Waste Management Program.
- **Policy 2.2.** Implement an emergency preparedness program (referenced by the State as a Multihazard Function Plan) to ensure that emergency shelters and emergency evacuation and response routes are provided and clearly identified.
- **Policy 2.5.** Emergency equipment response routes and evacuation procedures shall be defined and provided for.
- **Policy 3.1.** Cooperate with the enforcement of disclosure laws requiring all users, producers, and transporters of hazardous materials and wastes to clearly identify such materials at the site and to notify the appropriate local County, State and/or Federal agencies in the event of a violation.
- **Policy 3.4.** Land uses involved in the production, storage, transportation, handling, or disposal of hazardous materials will be located a safe distance from land uses that may be adversely impacted by such activities.

Multi-Jurisdictional Hazard Mitigation Plan

The Multi-Jurisdictional Hazard Mitigation Plan is a countywide plan that identifies risks and ways to minimize damage from natural and human-caused disasters. The Plan is a comprehensive resource document that serves many purposes such as enhancing public awareness, creating a decision tool for management, promoting compliance with state and federal program requirements, enhancing local policies for mitigation capability, and providing inter-jurisdictional coordination. The Plan includes a City of Encinitas Annex document that includes an overview of the City and its resources, an outreach strategy, review of the community capabilities, a risk assessment, and mitigation strategy (San Diego 2023).

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3.6.2 Existing Conditions

HISTORICAL AND CURRENT SITE BACKGROUND

The project site is developed with elementary school uses (buildings, parking lots, fields, hardscaping, and landscaping). Based on a review of historical documentation, including aerial photographs and topographic maps, the project site has operated as an elementary school since 1927 (Padre 2025). Additions were made throughout the years, and the project site currently operates as the Paul Ecke Central Elementary School.

The Phase I Environmental Site Assessment (ESA) site reconnaissance observed a main administrative building, classroom buildings, multipurpose building, media center building, outdoor lunch area, garden area, playfields, and hard courts at the project site. A janitor's room was observed to contain general cleaning chemicals and supplies. Two pad-mounted electrical transformers were observed on site; however, no visible staining was observed around the base of these units (Padre 2025). An exterior site reconnaissance of the project site did not observe the presence of petroleum and/or chemical containers, nor petroleum and/or chemical stained soils or concrete/asphalt surfaces. No aboveground or indications of underground petroleum storage tanks were observed at the project site (Padre 2025).

PROJECT SITE HAZARDOUS MATERIALS

Radon

Radon is a colorless, odorless, tasteless, and radioactive gas that is produced as a natural decay product of uranium. Because of its radioactivity, studies have shown that at elevated concentrations there is a link between radon and lung cancer. Persons living in a building with elevated radon concentrations over a period of years may have an increased risk of contracting lung cancer. The potential for radon hazard at the project site is considered low and is dependent on site-design and building construction specifications (Padre 2025).

Oil and Gas Wells

The California Geologic Energy Management Division (CalGEM) oversees the drilling, operation, maintenance, and plugging and abandonment of oil wells, natural gas wells, and geothermal wells. According to a review of the CalGEM online database and interactive map, there are no reported oil wells, natural gas wells, and/or geothermal wells within a one-mile radius of the project site (Padre 2025).

Naturally Occurring Asbestos

Asbestos is a naturally occurring silicate mineral of the amphibole group that has historically been utilized for a variety of purposes, including fireproofing, due to its fibrous nature, which

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allowed it to be woven into cloth and formed into various types of construction material. Asbestos is a known carcinogen.

According to the California Geological Survey (CGS), Geologic Map of California, Santa Ana Sheet, there are no exposures of potentially asbestos-bearing ultramafic or serpentized rocks located within approximately 10 miles of the project site. Therefore, the potential for naturally occurring asbestos to be present at the project site from weathering and deposition of ultrabasic rock originating from outcrops is not considered a recognized environmental condition (REC) (Padre 2025).

Environmental Liens

As part of the Phase I ESA, the EDR Environmental Lien and activity use limitations search reports of available current land title records for environmental cleanup liens and other activity use limitations such as engineering controls and institutional controls were reviewed. No environmental liens or activity use limitations were identified for the project site (Padre 2025).

Asbestos-Containing Materials

Padre did not conduct a comprehensive ACM survey as part of the Phase I ESA. Properties with residential and/or commercial structures constructed before 1976 may potentially contain ACM. Based on a review of historic aerial photographs, building structures have been present at the project site prior to 1976. Therefore, the potential for ACM in building materials at the project site is considered a REC (Padre 2025).

Lead-Based Paint

Properties containing structures with paint or surface coatings, with the exception of residential structures constructed on or after January 1, 1979, or schools constructed prior to January 1, 1993, may have surfaces coated with lead-based paint. Based on a review of historic aerial photographs, building structures have been present at the project site since before 1993. Therefore, the potential for lead-based paint on building materials at the project site is considered a REC (Padre 2025).

Polychlorinated Biphenyls

Padre did not conduct a comprehensive polychlorinated biphenyls (PCBs) survey as part of the Phase I ESA. Two pad-mounted electrical transformers were observed on the project site. Based on the age of the project site, the potential presence of PCBs in soil from pad-mounted electrical transformers at the project site is considered a REC (Padre 2025).

Reportedly, PCBs were added to window caulking from 1950 to 1979 in commercial and school buildings. A review of historical aerial photographs indicates that many of the buildings at the project site were constructed between 1950 and 1979. Therefore, the potential for residual

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PCBs in soil from weathering of window caulking at the project site is considered a REC (Padre 2025).

Termiticides

Organochlorine pesticides (OCPs) were commonly used as insecticides for termite control around structures and typically applied surficially to soil surrounding foundations and injected into the soil in an effort to isolate wood structures from termite nests; chlordane was used in the United States until 1988. Buildings constructed prior to January 1, 1989, at school sites should be tested. Based on a review of historic aerial photographs, building structures have been present at the project site since before 1989. Therefore, the potential for residual OCPs in soil from direct application of termiticides is considered a REC (Padre 2025).

Vapor Encroachment Condition

Based on a review of surrounding properties, no existing or former facilities (e.g., dry cleaners, fuel stations, and/or manufactured gas plants) were identified adjacent to or near the project site. The project site formerly contained one 550-gallon gasoline UST and one 1,000-gallon heating oil UST that were removed under regulatory permit in 1987 and 1990, respectively. The gasoline tank and heating oil tank are considered historical recognized environmental conditions (HRECs). These former USTs do not present a vapor encroachment condition at the project site (Padre 2025).

Environmental Database Information

Several databases were reviewed to identify registrations and documented environmental incidents regarding the site and properties within a one-mile radius of the project site. The project site is not identified as a hazardous waste site in the following lists (Padre 2025):

- National Priorities List – Federal Superfund list
- US Superfund Enterprise Management System list
- US EPA's RCRA Program's Transportation, Storage, and Disposal Facilities list
- RCRA Large Quantity Generator list
- RCRA Small Quantity Generator list
- Emergency Response Notification System list
- RCRA Corrective Action Sites list
- State Solid Waste Facility/Landfill Facility list
- UST list
- California Facility Inventory Database UST list
- Leaking UST list
- Aboveground storage tank list

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- US Engineering Controls List
- US Institutional Controls list
- California Historic Cal-Sites list
- Waste Management Unit Database System/Solid Waste Assessment Test Program list
- California Hazardous Material Incident Reporting System list
- Comprehensive Environmental Response, Compensation, and Liability Information System – No Further Remedial Action Planned list
- Voluntary Cleanup Program list
- California Spills, Leaks, Investigations, and Cleanup list
- EnviroStor list.

The project site is identified on the following databases:

- **Historical UST List**, as the project site previously contained one 550-gallon gasoline UST and one 1,000-gallon heating oil tank;
- **Hazardous Waste Information System (HAZNET) database**, as asbestos-containing waste was disposed of from the project site; and
- **CUPA list**, as there was a former gasoline and heating oil UST on the project site that was removed under the San Diego County Department of Health Services permit (Padre 2025).

The following sites are within 0.25 mile of the project site:

- UST, RCP Block and Brick at 577 North Vulcan Avenue formerly contained one 550-gallon gasoline UST and one 10,000-gallon diesel fuel UST. The diesel fuel UST was removed in January 2012. Based on distance and regulatory status, this property is not considered a REC.
- Historical UST, Bunyard Masonry Supply Company (aka RCP Block and Brick) at 577 North Vulcan Avenue formerly contained one 550-gallon UST and one 10,000-gallon diesel fuel UST. The diesel fuel UST was removed in January 2012. Based on distance and regulatory status, this property is not considered a REC.
- Leaking underground storage tank (LUST), RCP Block and Brick at 577 North Vulcan Avenue formerly contained one 550-gallon gasoline UST and one 10,000-gallon diesel fuel UST. The diesel fuel UST was removed in January 2012, and soil and groundwater assessment activities were performed from 2012 through 2014. This property received regulatory closure in 2014, and based on the distance and regulatory status, this property is not considered a REC.

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PIPELINE SAFETY HAZARD

There is one high-pressure natural gas transmission pipeline within 1,500 feet of the project site. No hazardous liquid pipelines or other high-pressure natural gas pipelines were identified within the 1,500-foot radius of the project site (PlaceWorks 2025a). The Southern California Gas Company confirmed there is a high-pressure natural gas transmission pipeline approximately 35 feet west from the project site along the sidewalk area west of North Vulcan Avenue. The pipeline is currently categorized as Class 3, which indicates the pipeline is within 100 yards of a building or well-defined outside area that is occupied by 20 or more people at least 5 days a week for 10 weeks in any 12-month period. The pipeline is surveyed annually to look for pipeline leaks, construction activity, and other factors that may threaten the pipeline. Also, the external and internal corrosion systems and valves are monitored annually (PlaceWorks 2025a). The Pipeline Safety Hazard Assessment found that in the unlikely event of a rupture or leak in the high-pressure natural gas pipeline within 1,500 feet of the project site, the risk to students and staff would be less than significant according to the California Department of Education (CDE) assessment criteria (PlaceWorks 2025a).

The San Dieguito Water District indicated that there are two large volume (i.e., at least 12 inches in diameter) water pipelines within 1,500 feet of the project site (PlaceWorks 2025a). The Pipeline Safety Hazard Assessment found that in the event that water is released from a full-flow rupture of any of the identified water mains, water would be entirely contained within the confines of curbing (assumes a standard six-inch curb for residential and collector streets) and would not result in a flood at the project site (PlaceWorks 2025a).

RAILROAD SAFETY

The project site is 85 feet east of a single railroad track owned and operated by North County Transit District. Train traffic along this track includes Coaster commuter trains, Amtrak Pacific Surfliner trains, and occasional Burlington Northern Santa Fe freight trains. The right-of-way is fenced with restricted access in the vicinity of the project site (PlaceWorks 2025b). The Rail Safety Study indicated that the probability of trespass by students onto the railroad easement is very low because the easement is fenced, and there are no at-grade crossings within 1,500 feet of the project site. The Rail Safety Study also indicated that the likelihood of a rail accident or derailment occurring within 1,500 feet of the project site is once every 1,470 years and 1,960 years, respectively (PlaceWorks 2025b). The Rail Safety Study concluded that there are no unusual circumstances present that would result in significant risks to students or staff at the project site from rail operations.

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AIRPORT HAZARDS

The nearest public-use airport is the McClellan-Palomar Airport, approximately 4.8 miles northeast of the project site. The project site is outside of the Airport's compatibility zone (SAN 2011).

WILDFIRE

Wildland fire protection in California is the responsibility of either the local, state, or federal government. State responsibility areas (SRA) are the areas where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA covers more than 31 million acres, for which the California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services. Local responsibility areas (LRA) include incorporated cities, cultivated agricultural lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government. Fire hazard severity zones (FHSZs) are identified as moderate, high, and very high in an SRA, and very high in an LRA.

According to CAL FIRE's "Fire Hazard Severity Zone Viewer," the project site is within a LRA and is not in a Very High FHSZ (CAL FIRE 2025).

3.6.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, Environmental Checklist Form, of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to hazards and hazardous materials if it would:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school.

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- d) Be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, if the project would result in a safety hazard or excessive noise for people residing or working in the project area.
- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

3.6.4 Project Impact Analysis

-
- a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
-

Construction

Construction of the proposed project would require small amounts of hazardous materials such as vehicle fuels, lubricants, grease and transmission fluids, paints, and coatings. The handling, use, transport, and disposal of hazardous materials during the construction phase of the proposed project would comply with existing regulations of several agencies such as the US EPA, Cal/OSHA, and US Department of Transportation. Construction projects typically maintain supplies on site for containing and cleaning small spills of hazardous materials. However, construction activities would not involve a significant amount of hazardous materials. Project construction workers would be trained on the proper use, storage, and disposal of hazardous materials.

Construction activities would also be conducted in accordance with the Storm Water Pollution Prevention Plan (SWPPP) as part of the National Pollution Discharge Elimination System (NPDES) permit. The primary objective of the SWPPP is to identify, construct, implement, and maintain best management practices (BMPs) to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the construction site. BMPs for hazardous materials may include, but are not limited to, 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, storage, transport, and disposal of

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hazardous materials and with the safety procedures mandated by applicable federal, state, and local laws and regulations.

Compliance with these regulations would ensure that risks resulting from the routine transportation, use, storage, or disposal of hazardous materials or hazardous waste associated with the proposed project is **less than significant**.

Operation

Operation of the proposed project would include the use of hazardous materials that are typical of school facilities such as cleaning and maintenance supplies (e.g., cleaners, gasoline, paint, and pesticides). The project proposes to rebuild the Paul Ecke Central Elementary School, with the exception of the Old Schoolhouse. The existing campus currently, and would continue to, utilize hazardous materials typical of school facilities in relatively small quantities, which are not typically considered hazardous materials that could result in a significant hazard to the public or the environment. Hazardous materials used during operation of the proposed project would be transported, used, stored, and disposed of in accordance with existing regulations and product labeling, thereby minimizing the hazard to the public and the environment. Federal and state regulations require adherence to specific guidelines regarding the use, transportation, or disposal of hazardous materials. With the exercise of normal safety practices, the proposed project would not create substantial hazards to the public or the environment. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less-than-Significant Impact.

b) Would the project 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?

Construction and Operation

As discussed in Impact (a), construction activities would require small amounts of hazardous materials, including vehicle fuels, lubricants, grease and transmission fluids, and paints and coatings. The use, transportation, and disposal of hazardous materials would be in accordance with regulatory standards and manufacturer specifications. Hazardous materials would be used in small quantities and properly stored. As such, the use of hazardous materials would not pose a threat to health and safety hazards. Operation of the proposed project would transport, use, store, and dispose of small amounts of hazardous cleaning and maintenance supplies typical of school facilities such as cleaners, gasoline, paint, and pesticides. Compliance with applicable federal and state laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure impacts would be **less than significant**.

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Underground Storage Tanks

Based on the Phase I ESA, the project site formerly contained one 550-gallon gasoline UST and one 1,000-gallon heating oil UST. The 550-gallon gasoline UST was removed in 1987 under permit from the San Diego County Department of Health Services. The excavation was backfilled, and there was no indication of soil or groundwater contamination, and therefore, no further action was required. A 1,000-gallon heating oil UST installed in 1928 was removed under a Department of Health Services permit in June 1990. The tank showed heavy corrosion with holes in the bottom. Two soil samples were collected; both were reported as non-detect, and no further action was required. The 550-gallon and 1,000-gallon USTs are considered HRECs (Padre 2025). As such, the previous hazardous substances release has been adequately addressed in accordance with applicable regulatory standards and would not pose a significant hazard, and no additional assessment or remediation related to these former USTs is recommended. As such, impacts would be **less than significant**.

Recognized Environmental Conditions

The following RECs were identified based on the findings of the Phase I ESA and the requirements of the California Department of Education (CDE) and the Department of Toxic Substances Control (DTSC) for school sites:

- the potential for ACM in building materials for buildings constructed before 1976 at the project site
- the potential for residual lead in soil associated with weathering of lead-based paint from buildings constructed before 1993 at the project site
- the potential for OCPs in soil from the direct application of termiticides around the foundations of buildings containing wood components that were present prior to 1989 at the project site
- the potential for PCBs in soil from the presence of pad-mounted electrical transformers and from weathering of window caulking that may contain PCBs in school buildings constructed between 1950 and 1979

The project proposed would demolish and rebuild Paul Ecke Central Elementary School campus, except for the Old Schoolhouse. During construction (i.e., demolition and earthwork), the identified RECs have the potential to be accidentally released into the environment. At the time of preparation of this DEIR, a Phase I Addendum was being prepared per the requirements of the DTSC for school projects applying for state funding. The Phase I Addendum includes soil sampling to further evaluate identified RECs. If the results of the Phase I Addendum indicate that chemical concentrations in the soil exceed applicable screening or action levels established by DTSC, corrective action would be implemented in consultation with DTSC. Therefore, impacts

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associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment are **potentially significant**.

Impact HAZ-1: In the event RECs within the soil exceed applicable screening or action levels established by DTSC, reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment could occur.

Mitigation Measure HAZ-1: Upon completion of a Phase I Addendum (soil sampling) report (report), the report shall be submitted to the California Department of Toxic Substances Control (DTSC) for review and approval of the report's conclusions and recommendations. If the report concludes that potential contaminants of concern have not been identified at or above the regulatory screening levels, then the report shall recommend that DTSC provide the Encinitas Union School District (EUSD) with a "No Further Action" letter of determination for the project site. If the report concludes that contaminants of concern have been identified above regulatory screening levels, then the report shall recommend further assessment. Depending on the extent of soil contamination identified, a remediation plan may be required to protect human health and the environment. EUSD shall enter into an environmental oversight agreement with DTSC to ensure that all applicable local, state, or federal regulations are followed during the remediation process. The remedial actions shall be implemented and completed before construction is completed and prior to occupancy.

Significance with Mitigation: Less-than-Significant Impact. In the event RECs in the soil exceed applicable screening or action levels established by DTSC, Mitigation Measure HAZ-1 would ensure the recommendations and remediation measures of the Phase I Addendum are implemented.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school?

The project site currently operates as the Paul Ecke Central Elementary School campus. No other school campuses exist within 0.25 mile of the project site. As discussed in Impact 3.6(a), construction and operation of the proposed project would handle small amounts of hazardous materials typical of school uses. The use, transportation, and storage of hazardous materials would be required to comply with all applicable federal and state regulations that would ensure the proper handling of such materials. The proposed project would not emit or handle significant hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Impacts would be **less than significant**.

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Additionally, because the proposed project includes a substantial rebuild of the existing school, consistent with CEQA Guidelines Section 15186 (c)(1), the project site was reviewed for additional information, as shown in Table 3.6-1, *California Environmental Quality Act Guidelines Section 15186 Analysis*.

Table 3.6-1 California Environmental Quality Act Guidelines Section 15186 Analysis

Code	Consistency Analysis
CEQA Guidelines Section 15186(c): When the project involves the purchase of a school site or the construction of a secondary or elementary school by a school district, the negative declaration or EIR prepared for the project shall not be adopted or certified unless: CEQA Guidelines Section 15186(c)(1): The negative declaration, mitigated negative declaration, or EIR contains sufficient information to determine whether the property is:	
15186(c)(1)(A): The site of a current or former hazardous waste or solid waste disposal facility and, if so, whether wastes have been removed.	Based on the Title 5 School Facilities Evaluation report, the project site is not within 2,000 feet of a significant disposal of hazardous waste (PlaceWorks 2025c).
15186(c)(1)(B): A hazardous substance release site identified by the Department of Toxic Substances Control in a current list adopted pursuant to Section 25356 of the Health and Safety Code for removal or remedial action pursuant to Chapter 6.8 (commencing with Section 25300) of Division 20 of the Health and Safety Code.	The project site is not listed as a hazardous substance release site, and no corrective action or cleanup activities are required for the project site (PlaceWorks 2025c).
15186(c)(1)(C): The site of one or more buried or aboveground pipelines which carry hazardous substances, acutely hazardous materials, or hazardous wastes, as defined in Division 20 of the Health and Safety Code. This does not include a natural gas pipeline used only to supply the school or neighborhood.	The Pipeline Safety Hazard Assessment (PSHA) identified one high-pressure natural gas transmission pipeline within 1,500 feet of the project site; no hazardous liquid pipelines or other high-pressure natural gas pipelines were identified within the 1,500-foot radius (PlaceWorks 2025a). Per the California Department of Education assessment criteria, the risk to students and staff of a pipe rupture would be less than significant; the pipeline is surveyed annually to look for pipeline leaks, construction activity, and other factors that may threaten the pipeline. Also, the external and internal corrosion systems and valves are monitored annually. The PSHA also identified two large volume water pipelines within 1,500 feet of the project site (PlaceWorks 2025a). In the event that water is released from a full-flow rupture of any of the identified water mains, water

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Table 3.6-1 California Environmental Quality Act Guidelines Section 15186 Analysis

Code	Consistency Analysis
	would be entirely contained within the confines of the curbing and would not result in a flood at the project site. The PSHA determined that the high-pressure natural gas and water pipelines would not pose a risk to students or staff at the project site.
15186(c)(1)(D): Within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor.	Public Resources Code Section 21151.8(b)(9) and Education code Section 17213 (d)(9) define a “freeway or other busy traffic corridors” as roadways that on an average day have traffic in excess of 50,000 vehicles in rural areas, 100,000 vehicles in urban areas, or 100,000 average daily trips (ADT). The nearest traffic corridors to the project site are North Vulcan Avenue, adjacent to the project site, and the U.S. Highway 101 (U.S. 101), approximately 184 feet west of the project site. The ADT for North Vulcan Avenue and U.S. 101 are 7,500 ADT and 19,900 ADT, respectively, which are below the 100,000 ADT criteria. The nearest busy traffic corridor, I5, is approximately 0.33 mile east of the project site, which is over 500 feet away from the project site (PlaceWorks 2025c). There is no potential for air quality health risk related to busy traffic corridors in the vicinity of the project site (PlaceWorks 2025c). Education Code Section 17251 requires preparation of a rail safety study if a school is within 1,500 of a railroad easement. The North County Transit District owns and operates one main line track with Coaster commuter rail traffic within a 100-foot-wide easement, approximately 85 feet west of the project site. The Rail Safety Study concluded that the probability of trespass by students onto the North County Transit District railroad easement is very low because the easement is fenced, and there is a pedestrian/bicycle underpass immediately west of the project site; there are no at-grade crossings within 1,500 feet of the project site (PlaceWorks 2025b). Additionally, the likelihood of an accident or derailment occurring would be equivalent to once every 1,470 years or 1,960 years, respectively (PlaceWorks 2025b).

3.6 HAZARDS AND HAZARDOUS MATERIALS

The proposed project would be consistent with CEQA Guidelines Section 15186 (c)(1). Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less-than-Significant Impact.

d) Would the project be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

California Government Code Section 65962.5 requires referencing a list of hazardous materials sites, hazardous waste discharges for which the State Water Resources Control Board has issued certain types of orders, public drinking water wells collecting detectable levels of organic contaminants, underground storage tanks with reported unauthorized releases, and solid waste disposal facilities from which hazardous waste has mitigated.

As discussed in Impact 3.6(c), the project site is not within 2,000 feet of a significant disposal of hazardous waste. The Title 5 School Facilities Evaluation report indicated that a review of DTSC and State Water Resources Control Board's EnviroStor and GeoTracker databases did not identify the project site as a hazardous substance release site, and no corrective action or cleanup activities are required for the project site (PlaceWorks 2025c). Additionally, the project site is not within 2,000 feet of a significant disposal of hazardous waste per EnviroStor and GeoTracker (PlaceWorks 2025c).

The Phase I ESA identified one UST, LUST, and Historical UST within 0.25 mile of the project site at 577 North Vulcan Avenue. This property contained one 550-gallon gasoline UST and one 10,000-gallon diesel fuel UST. The diesel fuel UST was removed in January 2012. Soil and groundwater assessment activities were performed from 2012 through 2014, and this property received regulatory closure in 2014. Based on distance and regulatory status, this property is not considered a REC (Padre 2025). Therefore, this impact is **less than significant**.

Significance without Mitigation: Less-than-Significant Impact.

e) For a project 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?

The McClellan-Palomar Airport is approximately 4.8 miles northeast of the project site. The project site is not within two miles of a public airport or public use airport and is not located within the jurisdiction of an airport land use plan; the project site is outside of the Airport's compatibility zone (SAN 2011). Therefore, **no impact** would occur.

3.6 HAZARDS AND HAZARDOUS MATERIALS

Significance without Mitigation: No Impact.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The proposed project would have a significant impact if it would impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The City of Encinitas utilizes the San Diego County Emergency Operations Plan to prepare for, respond to, recover from, and mitigate against any potential hazards. The Public Safety Element of the General Plan identifies Encinitas Boulevard, North Vulcan Avenue, and I5 as evacuation routes (Encinitas 1995). As discussed in Section 3.17, *Transportation*, site access and circulation would be designed in accordance with all applicable District design requirements and would be subject to approval by DSA and the Encinitas Fire Department. The proposed project construction would occur within the project site boundaries and would improve circulation and access on site by increasing parking, providing a longer and wider parking lot at the western portion of the site, and expanding the drop-off/pick-up area. Therefore, the proposed project would not interfere with the identified evacuation routes, or evacuation and emergency plans.

Additionally, construction vehicles and materials would be properly stored and not block vehicle circulation or access within the project area. No vehicles or materials would be stored on public rights-of-way. The proposed project would comply with applicable CBC, CFC, and CDE design and safety standards and regulations. As previously mentioned, DSA and the Encinitas Fire Department would review project plans to ensure adequate emergency access and circulation during operation. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less-than-Significant Impact.

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

The project site is in a highly urbanized, built-out portion of the City of Encinitas. The project site is not located within a Very High FHSZ or any other FHSZ within the City (CAL FIRE 2025). The proposed project would not expose people or structure to significant wildfire risk, and the proposed project would comply with applicable CBC and CFC requirements. The DSA would review the project plans to ensure compliance with safety standards and to verify adequate emergency access and circulation during operations. Therefore, the proposed project would not result in a significant risk of loss, injury, or death related to wildland fires, and **no impact** would occur.

Significance without Mitigation: No Impact.

3.6 HAZARDS AND HAZARDOUS MATERIALS

3.6.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to hazards and hazardous materials?

Hazards and hazardous waste impacts are typically unique to each site and do not usually contribute to cumulative impacts. Cumulative development projects in the area would be required to assess potential hazardous materials' impacts on the development site prior to grading. The proposed project and cumulative projects would be required to comply with laws and regulations governing hazardous materials and hazardous waste used and generated. In addition, the project site is not in a FHSZ, and no impact related to fire hazards would occur. Therefore, cumulative impacts related to hazardous materials and fire hazards would be less than significant after regulatory compliance and implementation of applicable mitigation measures.

Overall, the proposed project would not introduce new uses to the project site and the use, storage, and transport of hazardous materials at the project site would be similar to existing conditions. Therefore, the proposed project would not be cumulatively considerable. Cumulative impacts would be **less than significant** after compliance with applicable regulations and site-appropriate mitigation measures.

Significance with Mitigation: Less-than-Significant Impact.

3.6.6 References

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3.7 NOISE

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the Paul Ecke Central Elementary School Rebuild Project (proposed project) to result in noise impacts in the noise environment in the local vicinity. Specifically, this section summarizes relevant federal, state, and local noise guidelines, policies, and standards; reviews noise levels at existing receptor locations; and evaluates potential noise impacts. This evaluation uses procedures and methodologies specified by the Federal Transit Administration (FTA). The analysis in this section is based in part on Appendix 3.7-1, *Noise Modeling Data*, of this Draft EIR.

Terminology

Sound. A disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.

Noise. Sound that is loud, unpleasant, unexpected, or otherwise undesirable.

Decibel (dB). A unitless measure of sound on a logarithmic scale.

A-Weighted Decibel (dBA). An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.

Equivalent Continuous Noise Level (L_{eq}); also called the Energy-Equivalent Noise Level. The value of an equivalent, steady sound level that, in a stated time period (often over an hour) and at a stated location, has the same A-weighted sound energy as the time-varying sound. Thus, the L_{eq} metric is a single numerical value that represents the equivalent amount of variable sound energy received by a receptor over the specified duration.

Statistical Sound Level (L_n). The sound level that is exceeded “n” percent of time during a given sample period. For example, the L_{50} level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period); that is, half of the sampling time, the changing noise levels are above this value and half of the time they are below it. This is called the “median sound level.” The L_{10} level, likewise, is the value that is exceeded 10 percent of the time (i.e., near the maximum) and this is often known as the “intrusive sound level.” The L_{90} is the sound level exceeded 90 percent of the time and is often considered the “effective background level” or “residual noise level.”

Day-Night Sound Level (L_{dn} or DNL). The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the sound levels occurring during the period from 10:00 pm to 7:00 am.

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Community Noise Equivalent Level (CNEL). The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added from 7:00 pm to 10:00 pm and 10 dB from 10:00 pm to 7:00 am. For general community/environmental noise, CNEL and L_{dn} values rarely differ by more than 1 dB (with the CNEL being only slightly more restrictive, that is, higher than the L_{dn} value). As a matter of practice, L_{dn} and CNEL values are interchangeable and are treated as equivalent in this assessment.

Peak Particle Velocity (PPV). The peak signal value of an oscillating vibration velocity waveform usually expressed in inches per second (in/sec).

Sensitive Receptor. Noise-sensitive and vibration-sensitive receptors include land uses where quiet environments are necessary for enjoyment and public health and safety. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, and nursing homes are examples.

Noise and Vibration Fundamentals

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.” Based on these known adverse effects of noise, the federal government, the State of California, and many local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities.

Sound Fundamentals

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in Hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the loudness of sound is the decibel (dB). Changes of 1 to 3 dBA are detectable under quiet, controlled conditions, and changes of less than 1 dBA are usually indiscernible. A 3 dBA change in noise levels is considered the minimum change that is detectable with human hearing in outside environments. A change of 5 dBA is readily discernable to most people in an exterior environment, and a 10 dBA change is perceived as a doubling (or halving) of the sound.

The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are “felt” more as a vibration. Similarly, while people with extremely sensitive hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about 10,000 Hz and below about 200 Hz. Since the

human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale is usually used to relate noise to human sensitivity. The A-weighted decibel (dBA) scale performs this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Sound Measurement

Sound intensity is measured through the A-weighted scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies.

Unlike linear units such as inches or pounds, decibels are measured on a logarithmic scale, representing points on a sharply rising curve. On a logarithmic scale, an increase of 10 dBA is 10 times more intense than 1 dBA, while 20 dBA is 100 times more intense, and 30 dBA is 1,000 times more intense. A sound as soft as human breathing is about 10 times greater than 0 dBA. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. Ambient sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud).

Sound levels are generated from a source, and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially as distance from the noise source increases. This phenomenon is known as "spreading loss." For a single point source, sound levels decrease by approximately 6 dBA for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by on-site operations from stationary equipment or activity at a project site. If noise is produced by a line source such as highway traffic, the sound decreases by 3 dBA for each doubling of distance in a hard site environment. Line source noise in a relatively flat environment with absorptive vegetation decreases by 4.5 dBA for each doubling of distance.

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called L_{eq}), or alternately, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, the L_{50} noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level, and half the time the noise level is less than this level. This level is also representative of the level that is exceeded 30 minutes in an hour. Similarly, the L_2 , L_8 , and L_{25} values represent the noise levels that are exceeded 2, 8, and 25 percent of the time or 1, 5, and 15 minutes per hour. These "L" values are typically used to demonstrate compliance for stationary noise sources with a city's noise ordinance, which is discussed as follows. Other values typically noted during a noise survey are the L_{min} and L_{max} . These values represent the minimum and maximum root-mean-square noise levels obtained over the measurement period.

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Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, an artificial dB increment is added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL) or Day-Night Noise Level (L_{dn}). The CNEL descriptor requires that an artificial increment of 5 dBA be added to the actual noise level for the hours from 7:00 am to 10:00 pm and 10 dBA for the hours from 10:00 p.m. to 7:00 am. The L_{dn} descriptor uses the same methodology except that there is no artificial increment added to the hours between 7:00 pm and 10:00 pm. Both descriptors give roughly the same 24-hour level with the CNEL being only slightly more restrictive (i.e., higher).

Psychological and Physiological Effects of Noise

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, and thereby affecting blood pressure, functions of the heart, and the nervous system. In comparison, extended periods of noise exposure above 90 dBA could result in permanent hearing damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the human ear even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by the feeling of pain in the ear. This is called the threshold of pain. A sound level of 190 dBA will rupture the eardrum and permanently damage the inner ear.

VIBRATION FUNDAMENTALS

Vibration is an oscillatory motion through a solid medium such as the ground or a building. Vibration is normally associated with activities stemming from operations of railroads or vibration-intensive stationary sources but can also be associated with construction equipment such as jackhammers, pile drivers, and hydraulic hammers.

AMPLITUDE

Vibration amplitudes are usually described in terms of either the peak particle velocity (PPV) or the root mean square velocity. PPV is the maximum instantaneous peak of the vibration signal, and root mean square is the square root of the average of the squared amplitude of the signal. PPV is more appropriate for evaluating potential building damage. The units for PPV are normally inches per second (in/sec). Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration.

The way in which vibration is transmitted through the earth is called propagation. As vibration waves propagate from a source, the energy is spread over an ever-increasing area such that the energy level striking a given point is reduced with the distance from the energy source. This geometric spreading loss is inversely proportional to the square of the distance. The amount of

attenuation provided by material damping varies with soil type and condition as well as the frequency of the wave.

As with airborne sound, annoyance with vibrational energy is a subjective measure, depending on the level of activity and the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Persons accustomed to elevated ambient vibration levels, such as in an urban environment, may tolerate higher vibration levels. Table 3.7-1, *Human Reaction to Typical Vibration Levels*, shows the human response and the effects on buildings resulting from continuous vibration (in terms of various levels of PPV).

Table 3.7-1 Human Reaction to Typical Vibration Levels

Vibration Level Peak Particle Velocity	Human Reaction	Effect on Buildings
0.006–0.019 in/sec	Threshold of perception, possibility of intrusion	Vibrations unlikely to cause damage of any type
0.08 in/sec	Vibrations readily perceptible	Recommended upper level of vibration to which ruins and ancient monuments should be subjected
0.10 in/sec	Level at which continuous vibration begins to annoy people	Virtually no risk of “architectural” (i.e., not structural) damage to normal buildings
0.20 in/sec	Vibrations annoying to people in buildings	Threshold at which there is a risk to “architectural” damage to normal dwellings – houses with plastered walls and ceilings
0.4–0.6 in/sec	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, but would cause “architectural” damage and possibly minor structural damage

Source: Caltrans 2013.

3.7.1 Regulatory Framework

FEDERAL

Construction Noise and Vibration

The FTA oversees safety measures related to noise and vibration. The FTA’s Transit Noise and Vibration Impact Assessment manual indicates that 80 dBA equivalent sound level (L_{eq}) is reasonable criteria for assessing construction noise levels at residential uses (FTA 2018). In the

3.7 NOISE

absence of local construction noise limits, the FTA recommended that the 80 dBA L_{eq} criteria be used to assess the significance of construction noise levels at residential receivers.

The FTA also provides criteria for acceptable levels of groundborne vibration for various types of buildings. Structures amplify groundborne vibration; wood-frame buildings, such as typical residential structures, are more affected by ground vibration than heavier buildings. The level at which groundborne vibration is strong enough to cause architectural damage has not been determined conclusively, but the standards recommended by the FTA are shown in Table 3.7-2, *Federal Transit Administration Construction Vibration Damage Criteria*.

Table 3.7-2 Federal Transit Administration Construction Vibration Damage Criteria

Building/Structural Category	Peak Particle Velocity (PPV) (in/sec)	Approximate Vibration dB
I. Reinforced-concrete, steel, or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Notes: in/sec = inches per second; dB = decibel.

Source: FTA 2018.

According to the FTA's Transit Noise and Vibration Impact Assessment Manual, a vibration velocity (VdB) of 75 to 80 VdB will annoy individuals. Table 3.7-3, *Human Response to Different Levels of Groundborne Vibration and Noise*, presents the human response to different levels of groundborne vibration and noise. For purposes of analysis in this Draft EIR, the threshold of 75 VdB will be applied.

Table 3.7-3 Human Response to Different Levels of Groundborne Vibration and Noise

Vibration Velocity Level	Noise Level		Human Response
	Low Frequency	Mid Frequency	
65 VdB	25 dBA	40 dBA	Approximate threshold of perception for many humans. Low-frequency sound: usually inaudible. Mid-frequency sound: excessive for quiet sleeping areas.
75 VdB	35 dBA	50 dBA	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level annoying. Low-frequency noise: tolerable for sleeping areas. Mid-frequency noise: excessive in most quiet occupied areas.
85 VdB	45 dBA	60 dBA	Vibration tolerable only if there are an infrequent number of events per day. Low-frequency noise: excessive for sleeping areas. Mid-frequency noise: excessive even for infrequent events for some activities.

Source: FTA 2018, Table 5-5

Low Frequency = Approximate noise level when vibration spectrum peak is near 30 hertz (Hz).

Mid Frequency = Approximate noise level when vibration spectrum peak is near 60 Hz.

STATE

California Code of Regulations

Title 24, Part 11. The State of California's noise insulation standards for nonresidential uses are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 11, California Green Building Standards Code (CALGreen). CALGreen noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Proposed projects may use either the prescriptive method (Section 5.507.4.1) or the performance method (5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when located within a noise environment of 65 dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA L_{eq} (1-hr).

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LOCAL

City of Encinitas General Plan

The City of Encinitas (City) General Plan Noise Element identifies the City's noise compatibility standards and identifies goals and policies aimed at maintaining a healthy noise environment. There are no specific noise standards related to school uses. The following goals and policies are considered relative to the proposed project (Encinitas 1994).

- **Policy 1.1.** Review actions or projects that may have noise generation potential to determine what impact they may have on existing land uses. If a project would cause an increase in traffic noise levels, the policy of the City of Encinitas is to accept an increase up to an L_{dn} of 55 dB in outdoor residential use areas without mitigation. If a project would increase the traffic noise level by more than 5 dB and the resulting L_{dn} would be over 55 dB, then mitigation measures must be evaluated. If the project, or action, would increase traffic noise levels by 3 dB or more and the resulting L_{dn} would exceed 60 dB in outdoor use areas in residential development, noise mitigation must be similarly evaluated. The impact of non-transportation projects must generally be evaluated on a case-by-case basis. The following guidelines will aid in evaluating the impacts of commercial and industrial projects.
 - a) Performance Standards Adjacent to Residential Areas. New commercial construction adjacent to residential areas should not increase noise levels in a residential area by more than 3 dB (L_{dn}) or create noise impacts which would increase noise levels to more than an L_{dn} of 60 dB at the boundary of the nearest residential area, whichever is more restrictive.
 - b) Performance Standards Adjacent to Commercial and Industrial Areas. New commercial projects should not increase noise levels in a commercial area by more than 5 dB (L_{dn}) or increase noise levels to an L_{dn} in excess of 70 dB (office building, business and professional) or an L_{dn} of 75 dB (industrial) at the property line of an adjacent commercial/industrial use, whichever is more restrictive.

This criteria may be waived if, as determined by a noise analysis, there are mitigating circumstances (such as higher existing noise levels) and/or no uses would be adversely affected. Where conditions are unusual or where backgrounds are unusually low and the characteristics of a new noise source are not adequately described by using the L_{dn} noise descriptor, additional acoustical analysis is encouraged and the conclusions of such analysis will be considered by the City.

- **Policy 1.5.** The City will establish and maintain coordination among City, County, and State agencies involved in noise abatement and other agencies to reduce noise generated from sources outside the City's jurisdiction.

- **Policy 1. 8.** Establish noise standards for all types of noise not already identified in the General Plan or governed by existing ordinances.
- **Policy 2. 1.** Figure 2, the Noise and Land Use Compatibility Guidelines, and the accompanying discussion set forth the criteria for siting new development in the City of Encinitas. Any project which would be located in a normally unacceptable noise exposure area, based on the Land Use Compatibility Guidelines, shall require an acoustical analysis. Noise mitigation in the future shall be incorporated in the project as needed. As a condition of approval of a project, the City may require post-construction noise monitoring and sign off by an acoustician to ensure that City requirements have been met.
- **Policy 3.1.** The City will adopt and enforce a quantitative noise ordinance to resolve neighborhood conflicts and to control unnecessary noise in the City of Encinitas. Examples of the types of noise sources that can be controlled through the use of a quantitative noise ordinance are barking dogs, noisy mechanical equipment such as swimming pool and hot tub pumps, amplified music in commercial establishments, etc.
- **Policy 4. 1.** Ensure inclusion of noise mitigation measures in the design and operation of new and existing development.

City of Encinitas Municipal Code

The City's Municipal Code (Chapter 9.32, Noise Abatement Control, and Chapter 30.40, Performance Standards), establish property line noise level limits. Chapter 9.32 of the Municipal Code establishes a construction noise level standard and time restrictions for construction noise and provides exemptions for school use. Chapter 30.40 establishes noise level standards for various land use categories affected by stationary noise and vibration sources. The following sections of Chapters 9.32 and 30.40 are considered relative to the proposed project.

Section 9.32.410. Construction Equipment.

Except for emergency work, it shall be unlawful for any person, including the City, to operate construction equipment at any construction site, except as outlined in subsections A and B of this section:

- A. It shall be unlawful for any person, including the City, to operate construction equipment at any construction site on Sundays, and days appointed by the President, Governor or the City Council for a public fast, thanksgiving or holiday. Notwithstanding the above, a person may operate construction equipment on the above-specified days between the hours of 10:00 a.m. and 5:00 p.m. in compliance with the requirements of subsection B of this section at his or her residence or for the purpose of constructing a residence for him or herself, provided such operation of construction equipment is not carried

3.7 NOISE

on for profit or livelihood. In addition, it shall be unlawful for any person to operate construction equipment at any construction site on Mondays through Saturdays except between the hours of 7:00 a.m. and 7:00 p.m.

- B. No such equipment, or combination of equipment regardless of age or date of acquisition, shall be operated so as to cause noise at a level in excess of 75 decibels for more than eight hours during any 24-hour period when measured at or within the property lines of any property which is developed and used either in part or in whole for residential purposes. In the event that lower noise limit standards are established for construction equipment pursuant to state or federal law, said lower limits shall be used as a basis for revising and amending the noise level limits specified in this subsection.

Section 9.32.417. Exemptions.

- B. Sporting, Entertainment, Public Events. The provisions of this chapter shall not apply to:
1. Those reasonable sounds emanating from authorized school bands, school athletic and school entertainment events.

Section 30.40.010. Purpose.

In order to minimize the adverse impacts of certain nuisance factors and to provide methods of determining compatibility between uses of land and buildings, the following performance standards are established.

A. Noise.

1. Every use shall be so operated that the noise generated does not exceed the following levels at or beyond the lot line and does not exceed the limits of any adjacent zone (Table 3.7-4, *City of Encinitas Exterior Noise Performance Standards*).

Table 3.7-4 City of Encinitas Exterior Noise Performance Standards

Adjacent Zone	One Hour Average Sound Level, dBA L_{eq}	
	7:00 am to 10:00 pm	10:00 pm to 7:00 am
RR, RR-1, RR-2, R-3, R-5, R-8	50 dB	45 dB
R-11, RS-11, R-15, R-20, R-25, MHP	55 dB	50 dB
OP, LLC, LC, GC, L-VSC, VSC	60 dB	55 dB
L-I, BP	60 dB	55 dB

Source: City of Encinitas Municipal Code 30.40.010(A)(1).

2. ER/OS/PK will be governed by the limits applicable to the source of the complaint.
 3. The interior noise level as required by the State of California Noise Insulation Standards must not exceed an L_{dn} of 45 dB in multifamily dwellings. This interior standard shall also be applied to single-family dwellings and offices in the City of Encinitas.
 4. It shall be unlawful for any person on any property within the City to create any noise, or to allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person, which causes the noise level when measured on any other property to exceed the following:
 - a. The noise standard for cumulative period of more than 30 minutes in any hour; or
 - b. The noise standard plus 5 dB for a cumulative period of more than 15 minutes in any hour; or
 - c. The noise standard plus up to 15 dB for a cumulative period of more than one minute in any hour; or
 - d. The noise standard plus 20 dB for any period of time.
 5. For the purpose of this chapter, the peak decibel reading for a noise with a fluctuating noise level (such as live or recorded music) shall be considered as the noise level for the entire cumulative period of the noise. Likewise, the time between repetitive intermittent noises (such as banging, pounding, or hammering) shall be included in the cumulative of the noise.
- B. Vibration. Every use shall be so operated that the ground vibration generated at any time and measured at any point along the lot line of the lot on which the use is located shall not be perceptible and shall not exceed the following (Table 3.7-5, *City of Encinitas Vibration Standards*):

3.7 NOISE

Table 3.7-5 City of Encinitas Vibration Standards

Adjacent Zone	Vibration in Inches per Second	
	Impact	Steady-State
Residential	.006	.003
Commercial	.010	.005
Light Industrial	.040	.020
Public/Semi-Public	.010	.005

Source: Source: City of Encinitas Municipal Code 30.40.010(B).

3.7.2 Existing Conditions

The project site is surrounded by residential uses to the north and south, Orpheus Park to the east, and commercial uses to the west across North Vulcan Avenue and the railroad tracks. The noise environment surrounding the project site is characterized by roadway traffic from North Vulcan Avenue and North Coastal Highway 101 (Route 101), rail activity, children playing at Orpheus Park, and residential traffic along surrounding roadways (e.g., Union Street). Intermittent noise from rail activity also contributes to the existing ambient noise environment. Rail noise measurements indicate that train passbys occur for a duration of 6 to 12 seconds with noise levels ranging between 67 dBA L_{eq} and 75 dBA L_{eq} at 100 feet, as shown in Appendix 3.7-1. The nearest sensitive receptors to the project site are the single-family residences to the north and south, and Orpheus Park to the east.

AMBIENT NOISE MEASUREMENTS

To determine baseline noise levels in the project vicinity, ambient noise monitoring was conducted by PlaceWorks (Appendix 3.7-1). Four short-term (15-minute) measurement locations were selected and conducted around the project site. All measurements were conducted on Wednesday, July 23, 2025, during the school summer break. 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 the monitoring period. All measurements were at least 5 feet above the ground and away from reflective surfaces. Short-term measurement locations are described as follows and shown in Figure 3.7-1, *Approximate Noise Monitoring Locations*, and results are summarized in Table 3.7-6, *Short-Term Noise Measurements Summary in A-weighted Sound Levels*.

Table 3.7-6 Short-Term Noise Measurements Summary in A-weighted Sound Levels

Monitoring Location	Description	15-Minute Noise Level, dBA						
		L _{eq}	L _{max}	L _{min}	L ₅₀	L ₂₅	L ₈	L ₂
ST-1	Halcyon Road south of the project site 7/23/25, 2:02 PM	61.3	81.2	47.2	53.3	57.8	62.4	70.3
ST-2	East of the playground structures at the project site 7/23/25, 10:47 AM	53.2	69.4	41.1	65.1	52.5	47.7	45.7
ST-3	West of the playground structures at Orpheus Park 7/23/25, 2:27 PM	47.9	55.1	44.2	47.2	48.4	50.2	52.9
ST-4	At the southern residential property line of 156 Union Street 7/23/25, 1:38 PM	52.3	72.9	41.8	46.7	49.1	53.9	62.1

Source: Appendix 3.7-1.

Short-Term Location 1 (ST-1) was conducted at Halcyon Road just north of 401 North Vulcan Avenue and south of the Paul Ecke Central Elementary School play field. A 15-minute noise measurement began at 2:02 pm on Wednesday, July 23, 2025. The noise environment is characterized by traffic noise on North Vulcan Avenue, Route 101, music from residences, and trains. Noise levels measured between 61.3 dBA L_{eq} and 81.2 dBA L_{max} during the measurement period at ST-1.

Short-Term Location 2 (ST-2) was conducted on the project site, specifically east of the playground structures and west of 182 Halcyon Road. A 15-minute noise measurement began at 10:47 am on Wednesday, July 23, 2025. The noise environment is characterized primarily by residential noise, vehicle traffic on North Vulcan Avenue, Route 101, and the Summer Band practice on the project site. Noise levels measured between 53.2 dBA L_{eq} and 69.4 dBA L_{max} during the measurement period at ST-2.

Short-Term Location 3 (ST-3) was conducted west of the playground structures at Orpheus Park, east of the project site. A 15-minute noise measurement began at 2:27 pm on Wednesday, July 23, 2025. The noise environment is characterized primarily by small planes flying overhead, distant dog barking, and distant vehicle traffic on Orpheus Avenue and Route 101. Noise levels measured between 47.9 dBA L_{eq} and 55.1 dBA L_{max} during the measurement period at ST-3.

Short-Term Location 4 (ST-4) was conducted north of the project site at the 156 Union Street residential property line. A 15-minute noise measurement began at 1:38 pm on Wednesday, July 23, 2025. The noise environment is characterized primarily by small planes flying overhead, trains, and local and distant vehicle traffic on Union Street, North Vulcan Avenue, and Route

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101. Noise levels measured between 52.3 dBA L_{eq} and 72.9 dBA L_{max} during the measurement period at ST-4.

Train Passby Measurements were conducted 100 feet from the single railroad track centerline, in addition to short term ambient noise measurements. Measurements indicate that train passbys occur for a duration of 6 to 12 seconds with noise levels ranging between 67 dBA L_{eq} and 75 dBA L_{eq} at 100 feet. Daytime hourly rail noise levels would be approximately 60 dBA L_{eq} at 125 feet, assuming four passenger train events per hour traveling at 72 miles per hour with seven passenger cars.

3.7.3 Standards for Analysis

SIGNIFICANCE CRITERIA

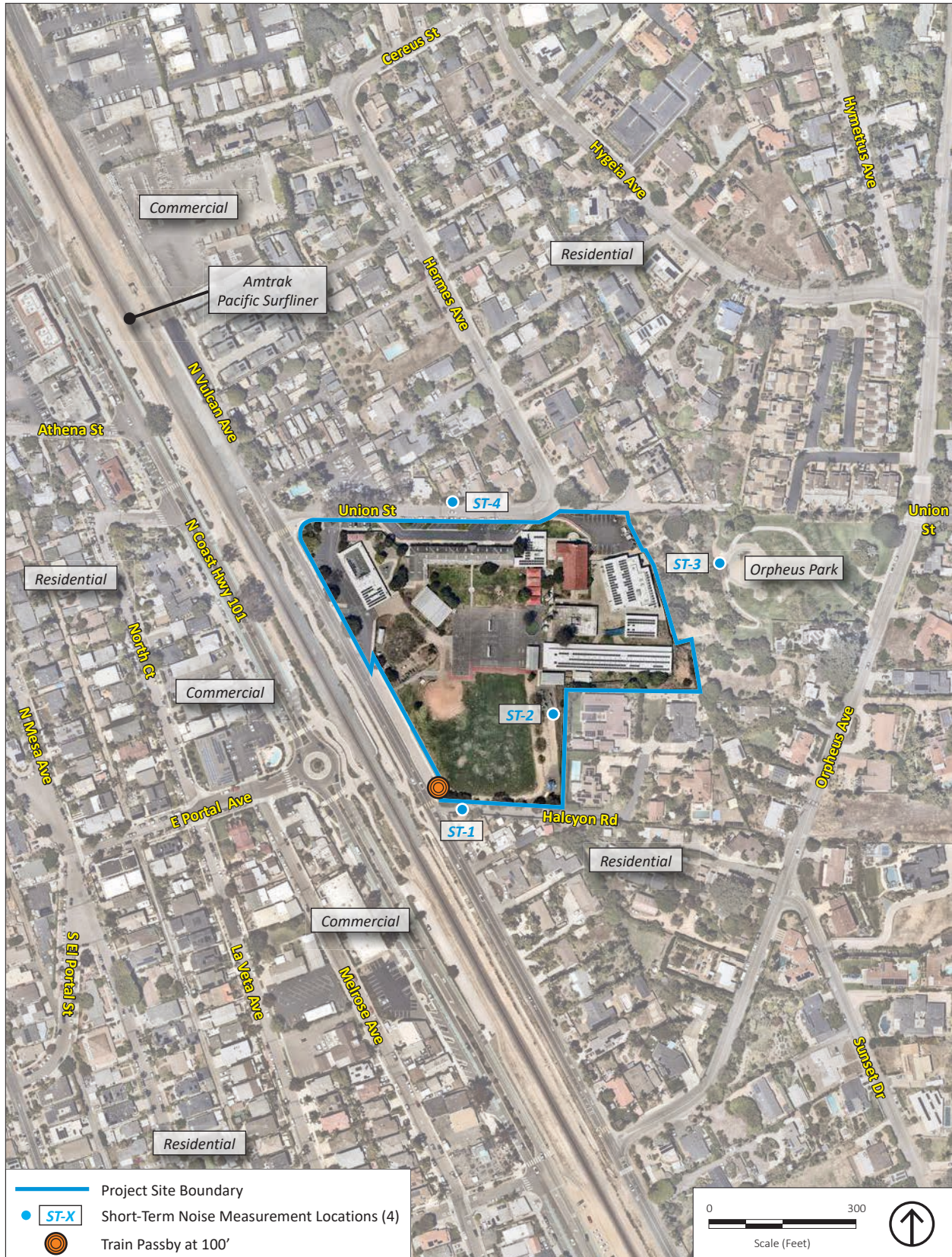
Appendix G, Environmental Checklist Form, of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to noise if it would:

- a) Generate 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.
- b) Generate excessive groundborne vibration or groundborne noise levels.
- c) For a project 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, if the project would expose people residing or working in the project area to excessive noise levels.

THRESHOLD GUIDANCE

Stationary Source Noise

The City's Municipal Code establishes exterior performance standards with maximum permissible noise level applied at the property line of the receiving use. A significant impact would occur if the proposed project exceeds the City's stationary noise standards summarized in Table 3.7-4.



Source: Nearmap 2025.

Figure 3.7-1
Approximate Noise Monitoring Locations

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Construction Noise

The City's Municipal Code states limits construction noise to 75 dB for eight hours during any 24-hour period and limits the operations of construction equipment at any construction site on Mondays through Saturdays except between the hours of 7:00 am and 7:00 pm. Construction equipment may not be operated on Sundays or days appointed by the President, Governor, or the City Council for a public fast or holiday. Notwithstanding the above, a person may operate construction equipment on the above specified days between the hours of 10:00 am and 5:00 pm, provided such operation of construction equipment is not carried on for profit or livelihood.

Vibration

The FTA vibration criteria, shown in Table 3.7-2, are used to evaluate vibration annoyance and structural damage. The potential for construction-related vibration annoyance impacts to be objectionable depends on the magnitude of vibration generated by the construction equipment, the frequency of occurrence of the vibration during the construction day, and total duration of construction activities.

Transportation Noise

A project will normally have a significant effect on the environment related to noise if transportation noise would substantially increase the ambient noise levels for adjoining noise sensitive areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 dBA to 3 dBA are detectable 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 exterior environment. Based on this, the following thresholds of significance similar to those recommended by the Federal Aviation Administration are used to assess traffic noise impacts at sensitive receptor locations. A significant impact would occur if project traffic noise increases would exceed:

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

A significant cumulative traffic noise impact occurs when the thresholds above are exceeded under cumulative conditions (with project) and the contribution of the project to future traffic is calculated to be greater than 5 dBA CNEL, based on ambient noise levels.

METHODOLOGY

This noise evaluation was prepared in accordance with the requirements of CEQA to determine if the proposed project would result in significant construction and operational impacts at nearby sensitive receptors. Due to the California Building Industry Association v. Bay Area Air

3.7 NOISE

Quality Management District, 62 Cal. 4th 369 (No. S 213478) ruling issued December 17, 2015, noise compatibility for on-site sensitive receptors is generally no longer the purview of the CEQA. Therefore, no significance determination is required for the noise and land use compatibility of the proposed project.

Construction noise modeling was conducted using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). Traffic noise increases were estimated using a version of the FHWA Traffic Noise Prediction Model and average daily traffic (ADT) along study roadway segments provided by Garland Associates (Appendix 3.8-1, *Traffic Impact Analysis*). Noise impacts from non-transportation, stationary noise sources are based on the noise limits of the City of Encinitas Municipal Code. Vibration impacts are assessed using methodology included in the FTA guideline document on noise and vibration impact assessment (FTA 2018).

3.7.4 Project Impact Analysis

-
- a) **Would the project generate 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?**
-

Construction Noise

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 (e.g., dropping of materials) can also be noticeable.

The noise produced at each construction phase is determined by combining the L_{eq} contributions from the 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 at least 6 dBA per doubling of distance (conservatively disregarding other attenuation effects from air absorption, ground effects, and shielding effects

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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 expected construction equipment mix was estimated and categorized by construction activity using the Federal Highway Administration RCNM. Assuming the nearest receptor to the center of construction activities, construction-related noise levels would be up to 74 dBA L_{eq} (residential uses to the south and north). Construction noise levels at receptors further away are estimated to be even less. Results are summarized in Table 3.7-7, *Project-Related Construction Noise Levels A-Weighted Decibel at the Nearest Receptors*.

Table 3.7-7 Project-Related Construction Noise Level A-Weighted Decibel at the Nearest Receptors

Construction Activity Phase	Noise Levels in dBA L_{eq}				
	RCNM Reference Noise Level	Receptor to North	Receptor to East	Receptor to South	Receptor to West
Distance (feet)	50	110	245	110	375
Site Preparation	80	73	66	73	62
Grading	81	74	67	74	63
Distance (feet)	50	90	165	80	340
Building Construction	78	73	68	74	61
Architectural Coating	77	72	67	73	60
Distance (feet)	50	75	155	65	280
Paving	77	73	67	75	62
Exceeds 75 dBA L_{eq} Standard?	No	No	No	No	No

Source: FHWA 2006. Distance measurements were taken using Google Earth (2025) from the area of anticipated construction to the property line of the nearest receptors.

dBA L_{eq} = Energy Average Sound Levels

The project would occur during the daytime hours per Encinitas Municipal Code Section 9.32.410, and construction noise levels would not exceed the City's threshold of 75 dBA L_{eq} at adjacent uses. However, project construction noise would create a substantial temporary increase in ambient noise levels in the vicinity of the project site at noise sensitive uses. Therefore, this impact is **potentially significant**.

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Impact NOI-1: Construction activities associated with the proposed project occurring near sensitive receptors would create a substantial temporary increase in ambient noise levels.

Mitigation Measure NOI-1: The Encinitas Union School District (EUSD or District) construction contract bid shall require the chosen construction contractor(s) to prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan shall be included as part of the permit application drawing set and as part of the construction drawing set. The Construction Noise Control Plan shall include, but not be limited to the following:

- Construction activity is limited to the hours between 7:00 am and 7:00 pm Mondays through Saturdays, as prescribed in Municipal Code Section 9.32.410.
- During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques wherever feasible (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds).
- Impact tools (e.g., jack hammers and hoe rams) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- Stationary equipment such as generators and air compressors shall be located as far as feasible from nearby noise-sensitive uses.
- Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors.
- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours as well as the telephone numbers of the District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the District.

- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.
- During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.

Significance with Mitigation: Less-than-Significant Impact. Implementation of Mitigation Measure NOI-1 would reduce noise impacts on sensitive receptors during construction to the extent feasible through implementation of construction best management practices. Construction noise levels would be reduced by 6 dBA with the use of the best available noise control techniques, specifically the use of proper engine mufflers.

Traffic Noise

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

Roadway segment ADT volumes were provided by Garland (Appendix 3.8-1). To determine the project-related traffic noise increase during the temporary relocation of students during construction, the “Existing ADT” volumes were compared to the “Existing with Project ADT” volumes, as shown in Table 3.7-8, *Summary of Temporary Traffic Noise Increases*. The temporary increase in vehicle trips from the proposed project would result in a minimal increase in ADT volumes on most study roadway segments, thus resulting in a minimal increase in traffic noise levels during construction at the project site, as students would be temporarily relocated. As shown in Table 3.7-8, the temporary project traffic increases would not exceed the 5 dBA in ambient noise environments of less 60 dBA CNEL threshold. The proposed project would not result in significant traffic noise increases. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

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Table 3.7-8 Summary of Temporary Traffic Noise Increases

Roadway	Segment		Average Daily Traffic Noise Levels, dBA CNEL		Noise Increase, dBA CNEL
	From	To	Existing No Project	Existing With Project	Project Noise Increase
North Vulcan Avenue	the North	Union Street	57	58	1
North Vulcan Avenue	Union Street	the South	58	58	<1
Union Street	the East	North Vulcan Avenue	53	54	1
Hemes Avenue	the North	Union Street	57	57	<1
Cereus Street	the East	Hermes Avenue	57	57	<1
Hygeia Avenue	the North	Cereus Street	56	56	<1
Hygeia Avenue	Cereus Street	the South	52	53	1

Source: FHWA 1978, Appendix 3.7-1. Based on traffic volumes provided by Garland. (see Appendix 3.8-1).

Stationary Noise

It is assumed that the proposed project would include rooftop heating, ventilation, and cooling (HVAC) equipment for the proposed school buildings. Rooftop HVAC units would generate noise levels of up to 72 dBA at 3 feet (York 2006). The nearest residential receptors to the south would be approximately 65 feet from the proposed buildings with rooftop HVAC. Accounting for rooftop parapets, HVAC noise levels at the residential receptors to the south would be approximately 44 dBA. The nearest residential receptors to the north would be approximately 90 feet to the north of the nearest proposed buildings. Accounting for rooftop parapets, HVAC noise levels at the residential receptors to the north would be approximately 41 dBA. The proposed project's HVAC noise would comply with the City of Encinitas Municipal Code Section 30.40.010 and would not exceed daytime or nighttime noise level standards of 50 dBA and 45 Leq, respectively. In addition, the HVAC noise levels would result in a less than 1 dBA increase over ambient noise levels at receptors to the north and south and no increase in ambient noise levels to the receptors to the east. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less-than-Significant Impact.

Parking Lot Noise Impacts

Upon project completion, there would be up to 60 parking spaces onsite, and a student drop-off area would be located on the western portion of the project site along North Vulcan Avenue

that could be expose sensitive receptors to noise due to vehicles idling, doors opening and closing, and voices in the parking lots. These activities would occur for short periods of approximately 10 to 20 minutes during student drop-off in the morning and student pick up mid-afternoon. These short-term parking lot activities would only occur during the daytime. Based on measurements conducted from a previous project by PlaceWorks, during student drop off at an elementary school for a similar project, the average noise level measured 55 dBA L_{eq} at 40 feet. The distance from the nearest school drop-off area along Vulcan Avenue to the nearest sensitive receptors is 260 feet (single-family residential to the south) and 280 feet (common outdoor activity area [pool at Brisa Pacific Hotel] to the west). At these distances, school drop-off noise levels would range between 38 dBA and 39 dBA L_{eq} at the nearest noise sensitive receptors to the drop-off area. The proposed project's parking lot noise would comply with the City of Encinitas Municipal Code Section 30.40.010 and would not exceed daytime noise level standard of 50 dBA L_{eq} . In addition, the proposed parking lot noise levels would result in a less than 1 dBA increase over ambient noise levels at receptors to the north, south, and west with no increase in ambient noise levels to the receptors to the east. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less-than-Significant Impact

Multi-Purpose Field and Hard Courts

Noise levels for multi-purpose field activities measure approximately 60 dBA L_{eq} at 15 feet. The nearest noise sensitive receptor to the multipurpose field is approximately 80 feet to the east. At that distance, noise levels would attenuate to 45 dBA L_{eq} . Noise levels for hard court activities measure approximately 60 dBA at 20 feet. The nearest noise sensitive receptor to the nearest proposed hard courts is approximately 200 feet to the east. At that distance, noise levels would attenuate to 40 dBA L_{eq} . As a result, activities on the multipurpose field and hard courts would not exceed the City's daytime exterior noise standards of 50 dBA at the nearest noise sensitive receptors. In addition, the multi-purpose field and hard courts noise levels would result in a less than 1 dBA increase over ambient noise levels at receptors to the north, south, and west with no increase in ambient noise levels to the receptors to the east. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less-than-Significant Impact.

b) Would the project generate excessive groundborne vibration or groundborne noise levels?

Construction

Construction activities have the potential to generate varying degrees of ground vibration, depending on the construction procedures and equipment. The use of construction equipment

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

For reference, a vibration level of 0.2 in/sec PPV is used as the limit for nonengineered timber and masonry buildings, which would conservatively apply to the surrounding structures (FTA 2018). Typical construction equipment can generate vibration levels ranging from 0.21 in/sec PPV at 25 feet.

Table 3.7-9, *Project-Related Construction Vibration Damage Levels*, summarizes vibration levels for typical construction equipment at a reference distance of 25 feet and the nearest sensitive receptor. The nearest off-site receptors are the residences to the south approximately 65 feet south of Table 3.7-9 Project-Related Construction Vibration Damage Levels of the nearest construction impact area (fire lane paving).

Table 3.7-9 Project-Related Construction Vibration Damage Levels

Equipment	Levels, PPV (in/sec)				
	FTA Reference at 25 Feet	Receptor to North at 75 feet	Receptor to East at 155 feet	Receptor to South at 65 feet	Receptor to West at 280 feet
Vibratory Roller	0.21	0.040	0.014	0.050	0.006
Large Bulldozer	0.089	0.017	0.006	0.021	0.002
Caisson Drilling	0.089	0.017	0.006	0.021	0.002
Loaded Trucks	0.076	0.015	0.005	0.018	0.002
Static Roller	0.05	0.010	0.003	0.012	0.001
Jackhammer	0.035	0.007	0.002	0.008	0.001
Exceed 0.2 in/sec PPV Standard?		No	No	No	No

Source: FTA 2018; Caltrans 2020.

As shown in Table 3.7-9, the proposed construction activities would not exceed the 0.2 in/sec PPV FTA standard. Therefore, construction vibration damage impacts would be **less than significant**.

Significance without Mitigation: Less-than-Significant Impact.

Operation

The proposed project's operational activities would not include any substantial long-term vibration sources. Therefore, no significant operational vibration effects would occur. Therefore, **no impact would occur.**

Significance without Mitigation: No impact.

-
- c) **For a project 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?**
-

The project site is approximately 4.8 miles southwest of McClellan-Palomar Airport. The project site is not within the 60 dBA CNEL airport noise contour of McClellan-Palomar Airport. The proposed project would not expose people working in the project area to excessive aircraft noise levels. **No impact would occur.**

Significance without Mitigation: No impact.

3.7.5 Cumulative Impact Analysis

Noise and vibration impacts are localized occurrences; they decrease rapidly in magnitude as the distance from the source to the receptor increases. Therefore, only projects that are in the direct vicinity of the project site would have the potential to be considered in a cumulative context with the proposed project's contribution.

No major stationary sources of noise, construction noise, or groundborne vibration sources were identified in the vicinity of the project site.

As defined in Section 15130 of the CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for noise. The project site is in an area that is developed with a suburban setting that includes commercial, residential, and open space uses.

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Would the project have a cumulative effect related to noise?

Construction

Cumulative impacts would only occur if other projects are being constructed in the vicinity of the project site at the same time as the proposed project. The area surrounding the project site is developed and consists of residential, commercial, and open space uses. There are no active or pipeline projects within the vicinity of the project site that would combine with the proposed project's construction noise to create cumulatively considerable impacts. As with the proposed project, other projects would be required to comply with the City's Noise Ordinance and applicable General Plan policies related to noise. As shown in Table 3.7-8, the temporary cumulative increase that would occur during the temporary relocation of students would be less than the most stringent significance threshold of 1.5 dBA for ambient noise environments of 65 dBA CNEL. Therefore, cumulative construction noise and vibration would be **less than significant**.

Operation

Operation of the proposed project would not exceed the City's noise standards. There are no other nearby sources of stationary noise in the project area that would significantly contribute to the ambient noise environment near the project site.

A significant cumulative traffic noise increase would be identified if project traffic were calculated to contribute 1.5 dBA or more under Cumulative Plus Project conditions to a significant traffic noise increase over existing conditions. That is, if a cumulative traffic noise increase greater than 1.5 dBA, 3 dBA, or 5 dBA relative to the existing environment significance threshold (less than 60 CNEL dBA, 60 to 65 CNEL dBA, greater than 65 CNEL dBA, respectively) is calculated, and the relative contribution from project traffic is calculated to contribute 1 dBA or more to this cumulative impact, it would be considered cumulatively considerable. Therefore, cumulative traffic noise impacts would be **less than significant**.

Airport

Noise and vibration are localized occurrences; they decrease rapidly in magnitude as the distance from the source to the receptor increases. The project site is located 4.8 miles southwest of McClellan-Palomar Airport and is outside the airport's 60 dBA CNEL contour, which is the threshold recognized by the Federal Aviation Administration, the California Department of Transportation Division of Aeronautics, and local jurisdictions for potentially incompatible noise exposure for residential and other sensitive land uses. The proposed project would not include uses that would generate new or increased aircraft activity, nor would it involve alterations to existing flight paths, aviation-related land uses, or noise-sensitive facilities that would draw significant people into areas subject to high aircraft noise exposure. Therefore, the proposed project would not contribute to a cumulatively considerable impact related to exposing people

working or residing in the area to excessive aircraft noise levels; impacts would be **less than significant**.

3.7.6 References

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3.7 NOISE

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3.8 TRANSPORTATION

This section of the Draft Environmental Impact Report (DEIR) evaluates the Paul Ecke Central Elementary School Rebuild Project's (proposed project) potential impacts on (1) a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; (2) vehicle-miles traveled (VMT); (3) increased hazards or incompatible uses, and (4) emergency access. Appendix 3.8-1, *Transportation Impact Analysis*, of this DEIR also includes a traffic/circulation analysis prepared by Garland Associates.

3.8.1 Regulatory Framework

State and local laws, regulations, plans, or guidelines related to transportation that are applicable to the proposed project are summarized in this section.

STATE

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law. The legislature found that with the adoption of the SB 375, the state had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled (VMT) and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32). Additionally, AB 1358 requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users.

SB 743 eliminated auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as the sole basis for determining significant impacts under the California Environmental Quality Act (CEQA). As part of the new CEQA Guidelines, the new criteria "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099(b)(1)).

Pursuant to SB 743, the Natural Resources Agency adopted revisions to the CEQA Guidelines to implement SB 743 on December 28, 2018. The revised CEQA Guidelines establish new criteria for determining the significance of transportation impacts. Under the new Guidelines, VMT-related metric(s) that evaluate the significance of transportation-related impacts under CEQA for development projects, land use plans, and transportation infrastructure projects were required beginning on July 1, 2020. The legislation does not preclude the application of local general plan policies, zoning codes, conditions of approval, or any other planning requirements

3.8 TRANSPORTATION

that require evaluation of LOS, but these metrics may no longer constitute the sole basis for determining transportation impacts under CEQA.

REGIONAL

San Diego Association of Governments: The 2021 Regional Plan

The San Diego Association of Governments (SANDAG) is the metropolitan planning organization (MPO) and regional transportation planning agency for the San Diego region. The 2021 Regional Plan offers a vision for a transportation system that does not rely on any single mode of transportation but instead offers a complete and integrated system to ensure that all San Diego County residents have access to safe transportation choices that protect the environment and support the regional economy. SANDAG released the draft 2025 Regional Plan in May 2025.

LOCAL

City of Encinitas Code of Ordinances

Chapter 30.28 Public/Semi-Public Zone

The following development standards related to access, circulation, and parking shall apply to public/semi-public zones:

- Reciprocal ingress and egress, circulation, and parking arrangements shall be provided to facilitate the ease of pedestrian, bicycle, and vehicular movements between adjacent residential and non-residential land uses to the extent feasible.
- Pedestrian and bicycle interconnecting circulation includes, but is not limited to, safe and clearly designated passages, walkways, trails, courtyards, breezeways, and/or bridges.
- The interconnection of pedestrian and bicycle circulation shall include, but not be limited to, the dedication of easements for future connectivity and circulation between adjacent land uses.

City of Encinitas General Plan

The Encinitas General Plan provides the basis for the City of Encinitas' (City's) policies and represents the community's basic values, ideals, and aspirations. The General Plan establishes policies to guide development. The Circulation Element of the City's General Plan includes the following policies related to transportation (Encinitas 2018):

- **Policy 1.7.** Encourage adjacent properties to use common access points to access prime arterials, major roads, collectors and augmented local streets.

- **Policy 1.9.** Minimize private driveway access onto both major and collector roads.
- **Policy 3. 1.** The needs of the handicapped will be considered in new development plans including handicapped parking, loading, etc.
- **Policy 3. 3.** Create a safe and convenient circulation system for pedestrians.
- **Policy 3.8.** A program shall be developed to install sidewalks or paths, where appropriate, around schools, churches, active parks, commercial and other areas of pedestrian activity where public safety or welfare is an issue.

Encinitas Recreational Trails Master Plan

The City’s Recreational Trails Master Plan outlines the goals and policies for managing the 85 acres of open space, 40 miles of trails, and plans for an additional 40 miles of trails and pedestrian connections throughout the City (Encinitas 2025).

3.8.2 Existing Conditions

Roadway Network

The streets that provide access to the project site include Union Street, North Vulcan Avenue, Hermes Avenue, Cereus Street, and Hygeia Avenue (Garland 2026).

Union Street is a two-lane street that abuts the northern portion of the project site. The speed limit on Union Street is 20 miles per hour (mph) and has parking on both sides of the street, although the north side has parking restriction signs. Union Street has a sidewalk on the south side of the street and no sidewalk on the north side. There are no bike lanes on Union Street.

North Vulcan Avenue is a two-lane street with a speed limit is 25 mph, though there are signs near the project site that state, “School – Speed Limit 20 – When Children Are Present.” Parking is prohibited on both sides of the street except where shoulders are available. There are no sidewalks on North Vulcan Avenue north of Union Street except for short segments on the east side of the street, and there are intermittent sidewalks on North Vulcan Avenue south of Union Street. Crosswalks across North Vulcan Avenue connect to the El Portal Undercrossing to a bike and pedestrian trail along Route 101. There are no bike lanes on North Vulcan Avenue; however, bikes are designated to share the roadway.

Hermes Avenue is a two-lane street with a speed limit of 20 mph and has on-street parking and shoulder parking. There is a sidewalk on the east side of the street but not the west side of the street. There are no bike lanes on Hermes Avenue.

3.8 TRANSPORTATION

Cereus Street is a two-lane street with a speed limit of 20 mph and parking on both sides of the street with parking restrictions during certain times of day. Cereus Street has a sidewalk on the south side of the street but no sidewalk on the north side. There are no bike lanes on Cereus Street.

Hygeia Avenue is a two-lane street with intermittent parking and sidewalks on both sides of the street. There are no bike lanes on Hygeia Avenue, and the speed limit is 20 mph.

Traffic Control and Crosswalks

The existing traffic control devices and crosswalks at the project area intersections are shown in Table 3.8-1, *Existing Traffic Control Devices and Crosswalks*.

Table 3.8-1 Existing Traffic Control Devices and Crosswalks

Intersection	Traffic Control	Crosswalks
Union Street at North Vulcan Avenue (T-intersection)	3-way stop signs	On south leg of North Vulcan Avenue
Union Street at Hermes Avenue (L-shaped intersection)	No traffic controls	No crosswalks
Hermes Avenue at Cereus Street (L-shaped intersection)	No traffic controls	No crosswalks
Cereus Street Hygeia Avenue (T-intersection)	3-way stop signs	On west leg of Cereus Street

Source: Garland 2026

Transit Service and Active Transportation

North County Transit District operates Bus Route 101 along Route 101 west of the railroad tracks west of North Vulcan Avenue, and along North Vulcan Avenue south of Encinitas Boulevard (Garland 2026). Bus Routes 304 and 309 run along Encinitas Boulevard and North Vulcan Avenue, south of Encinitas Boulevard. The bus stops nearest to the project site are at the intersection of Route 101 and El Portal Street, approximately 200 feet west of the project site and at the intersection of Encinitas Boulevard and North Vulcan Avenue, approximately 0.6 mile south of the project site.

Crosswalks across North Vulcan Avenue connect to the El Portal Undercrossing to a bike and pedestrian trail along Route 101. There are no bike lanes on North Vulcan Avenue; however, bikes are designated to share the roadway.

3.8 TRANSPORTATION

Traffic Volumes

Manual traffic counts were taken on the project area streets during the weekday morning peak period on Thursday, August 28, 2025, when school was in session. Table 3.8-2, *Existing Peak Hour Traffic Volumes*, shows the existing peak hour traffic volumes on the project area streets.

Table 3.8-2 Existing Peak Hour Traffic Volumes

Street Segment	Morning Peak Hour Traffic Volumes (vehicle per hour)
North Vulcan Avenue	
North of Union Street	238
South of Union Street	290
Union Street East of North Vulcan Avenue	150
Hermes Avenue North of Union Street	320
Cereus Street East of Hermes Avenue	322
Hygeia Avenue	
North of Cereus Street	280
South of Cereus Street	112

Source: Garland 2026

Existing Access, Parking, and Circulation System at the Project Site

Access to the project site is currently provided by one driveway on North Vulcan Avenue and four driveways on Union Street. The driveway on North Vulcan Avenue is an ingress-only driveway which provides access to a parking lot and student drop-off/pick-up area on the west side of the project site (Garland 2026). The west driveway on Union Street is the exit-only driveway from this parking lot and drop-off/pick-up zone.

The second driveway on Union Street provides access to a parking lot and student drop-off/pickup area on the north side of the project site adjacent to the school's primary entrance. It is an ingress-only driveway. The third driveway on Union Street is the exit-only driveway from this north parking lot and student drop-off/pick-up area. The east driveway on Union Street provides access to and from a parking lot that is located at the northeast corner of the project site. In addition, there is a row of five parking spaces that are perpendicular to Union Street near the northwest corner of the project site that are accessed directly from Union Street.

There are four parking lots at the campus with a total of 39 parking spaces. The first parking lot is on the west side of the project site with parking spaces on the west side of the lot adjacent to North Vulcan Avenue, and a vehicle queuing area and student drop-off/pick-up area on the east side of the lot. It has a one-way northbound circulation aisle. The second parking lot is the row of five parking spaces adjacent to Union Street. The third parking lot is on the northwestern side

3.8 TRANSPORTATION

of the project site with one-way eastbound circulation aisle. It has angled parking spaces on the north side of the lot adjacent to Union Street and a student drop-off/pick-up area on the south side of the lot. The fourth parking lot is located at the northeastern corner of the campus. It has parking spaces around the perimeter of the lot and a two-directional circulation aisle/maneuvering area in the center of the lot.

3.8.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, “Environmental Checklist Form,” of the CEQA Guidelines states that the proposed project would result in a significant impact related to transportation if it would:

- a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- d) Result in inadequate emergency access.

3.8.4 Project Impact Analysis

-
- a) **Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**
-

General Plan

The Circulation Element of the General Plan includes specific goals and policies that serve as a comprehensive framework for managing transportation infrastructure and promoting efficient mobility within the City of Encinitas.

As discussed in Section 3.8.2, *Existing Conditions*, pedestrian access to the project site is provided by sidewalks on Union Street, Hermes Avenue, Cereus Street, and Hygeia Avenue; painted crosswalks exist to the El Portal Undercrossing and the Cereus Street, and Hygeia Avenue, and intermittently on North Vulcan Avenue. There are no bike lanes on these streets; however, bicycles are designated to share the road on North Vulcan Avenue. The project site has bike racks within the campus. As part of the proposed project, vehicular access and

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circulation as well as pedestrian safety would be improved by increasing parking, providing a longer and wider parking lot at the western portion of the site, adding stop signs and crosswalk on North Vulcan Avenue at the parking lot entrance, and expanding the drop-off/pick-up area (Garland 2026). Because the proposed project would not result in an increase in students, teachers, or staff, the level of school-generated traffic and the number of pedestrians and bicyclists would remain unchanged.

All improvements within the project site would be consistent with the criteria of the California Division of State Architects (DSA) and would be reviewed by DSA. Further, the improved circulation system would be subject to review and approval by the Encinitas Fire Department.

As such, the proposed project is consistent with the goals and policies of the Circulation Element, and the proposed project would not adversely affect the performance of any roadway, transit, or non-motorized transportation facility. The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be **less than significant**.

San Diego Association of Governments: The 2021 Regional Plan

The proposed project would remain consistent with the SANDAG: 2021 Regional Plan, as no changes to land use or surrounding roadways are proposed, with the exception of the proposed stop signs and crosswalk, and the volume of vehicles or non-motorized vehicles are expected to remain consistent with existing conditions. The proposed project is expected to improve on-site access and safety and would increase on-site pedestrian safety. The proposed project would not interfere with the City's ability to continue to provide complete streets and active transportation facilities, which are key elements of the SANDAG: 2021 Regional Plan. Therefore, the proposed project would not conflict with the SANDAG: 2021 Regional Plan. Impacts would be **less than significant**.

Significance without Mitigation: Less-than-significant impact.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

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

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Section 21099(b)(1)). Pursuant to SB 743, the California Natural Resources Agency adopted revisions to the CEQA Guidelines on December 28, 2018, to implement SB 743. CEQA Guidelines Section 15064.3 describes how transportation impacts are to be analyzed after SB 743. Under the Guidelines, metrics related to 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.

The City of Encinitas’ VMT Analysis Guidelines include screening criteria that can be used to identify when a proposed project is anticipated to result in a less-than-significant VMT impact. The Guidelines state that a project is presumed to have a less-than-significant impact on VMT if the project is a locally serving public facility. Public schools are included in the list of locally serving public facilities. As the proposed project is a public elementary school, it can be screened from requiring a detailed VMT analysis. In addition, the Guidelines state that projects that generate less than 110 vehicle trips per day can be screened from requiring a VMT analysis. As the proposed project would not result in an increase in student, staff, or teachers, the proposed project is not anticipated to generate additional traffic and falls into this category. Based on these Guidelines, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), which addresses VMT, and would have a **less-than-significant impact**.

During construction of the proposed project, students would temporarily attend Park Dale Lane Elementary School, approximately 3 miles east of the project site, and El Camino Creek Elementary School, approximately 2.3 miles northeast of the project site. It is assumed that approximately 50 percent of the students would use the buses provided by the District, with approximately 50 students per bus, thereby resulting in a need for three buses to transport students to Park Dale Lane Elementary School and three buses to transport students to El Camino Creek Elementary School. The other 50 percent of students would be transported in parents’ vehicles. The temporary relocation of students to these schools could potentially result in a temporary increase in VMT; however, impacts would not be significant because these trips would not represent a permanent change in travel behavior and because temporary construction impacts are not considered to be significant under CEQA. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less-than-significant impact.

3.8 TRANSPORTATION

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

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. Upon project completion, access to the project site would be provided by two driveways on the east side of North Vulcan Avenue and an existing driveway at the intersection of Union Street and Hermes Avenue. New diagonal parking would be provided on Union Street. The western parking lot and drop-off/pick-up zone off North Vulcan Avenue would be expanded to extend much of the western boundary of the project site. There would be one roadway modification in the public right-of-way other than the two driveways on North Vulcan Avenue, which would be designed and constructed in accordance with the City's criteria. The modification would be the addition of stop signs on the north and south approaches of North Vulcan Avenue at the entry driveway to the western parking lot, as well as a new painted pedestrian crosswalk. These features would improve vehicular and pedestrian safety and are subject to approval by the City. All improvements within the project site would be consistent with the DSA's criteria and would be reviewed by DSA.

The levels of school-generated traffic and the number of pedestrians and bicyclists would remain unchanged as a result of the proposed project because there would be no increase in students, staff, or teachers. The surrounding roadways and intersections have historically been accommodating daily school-related traffic for the existing school, and the proposed project would be compatible with the design and operation of a school. Therefore, the proposed project would not result in any major modifications to the access features of the project site.

The proposed project would result in improved access and circulation on site, an expanded student drop-off/pick-up area, improved pedestrian safety, and an increase in parking spaces (Garland 2026). While the angled parking spaces on the south side of Union Street could potentially result in safety issues, the circulation and parking would be subject to review and approval by the City, and due to the relatively low traffic volumes on Union Street, it is not anticipated to result in a significant adverse impact.

Since the existing street network could readily accommodate the proposed project's vehicular, pedestrian, and bicycle activity, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses, impacts would be **less than significant**.

Significance without Mitigation: Less-than-significant impact.

d) Would the project result in inadequate emergency access?

Emergency access to the project site would be provided by two driveways on the east side of North Vulcan Avenue and a driveway at the intersection of Union Street and Hermes Avenue, at

3.8 TRANSPORTATION

the northeastern corner of the project site. The proposed project would include a 20-foot-wide fire lane that would allow emergency vehicle access to the project site (school buildings, fields, and hard courts). The access/circulation features at the project site are subject to, and must satisfy, the District's design requirements and would be subject to approval by DSA and the Encinitas Fire Department. Emergency vehicles would have easy access the buildings and other areas of the project site via on-site travel corridors. Therefore, the proposed project would not result in inadequate emergency access, and impacts would be **less than significant**.

Significance without Mitigation: Less-than-significant impact.

3.8.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to transportation?

The proposed project would be consistent with adopted policies, plans, and programs regarding circulation, including public transit, bicycle, and pedestrian facilities. Similar to the proposed project, each cumulative project would be expected to be consistent with the existing programs, plans, ordinances, and policies that address its jurisdiction's circulation system. Additionally, all related projects would be required to submit site plans to the City and the Encinitas Fire Department for review and approval to ensure those projects would not create hazardous geometric features or impact emergency access. Each construction project would be required to prepare and implement site-specific construction worksite staging and construction plans to reduce potential impacts to emergency access and potentially incorporate mitigation measures. Therefore, the proposed project's contribution to cumulative transportation impacts would be less than cumulatively considerable, and the proposed project's impacts would be **less than significant**.

Significance without Mitigation: Less-than-significant impact.

3.8.6 References

Encinitas, City of. 2018, November 28. City of Encinitas General Plan Circulation Element.
<https://portal.laserfiche.com/Portal/browse.aspx?id=665622&repo=r-d8c5c08d>

_____. 2025, October 9 (accessed). Trails and Open Space.
<https://www.encinitasca.gov/government/departments/parks-recreation-cultural-arts/parks-beaches-trails/trails-open-space>

Garland Associates (Garland). 2026, January. Traffic/Circulation Analysis for the Proposed Paul Ecke Central Elementary School Reconstruction Project. Appendix 3.8-1.

3.9 TRIBAL CULTURAL RESOURCES

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of Paul Ecke Central Elementary School Rebuild Project (proposed project) to impact tribal cultural resources (TCR). This section discusses state laws and regulations protecting resources, along with the existing cultural resource conditions on and near the project site. TCRs include landscapes, sacred places, or objects with a cultural value to a California Native American tribe. Potential impacts to other cultural resources (i.e., historic, archaeological, and disturbance of human remains) are evaluated in Section 3.3, *Cultural and Paleontological Resources*.

3.9.1 Regulatory Framework

Federal, state, and local laws, regulations, plans, or guidelines related to TCRs and potentially applicable to the proposed project are summarized as follows.

FEDERAL

National Register of Historic Places

The National Register of Historic Places (NRHP) recognizes properties that are significant at the national, state, and/or local levels and includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Properties are nominated to the NRHP by the State Historic Preservation Officer of the state in which the property is located, by the Federal Preservation Officer for properties under federal ownership or control, or by the Tribal Historic Preservation Officer if a property is on tribal lands.

The criteria for listing in the NRHP follow the standards for determining if properties, sites, districts, structures, or landscapes of potential significance are eligible for nomination. In addition to meeting any or all of the following criteria, properties nominated must also possess integrity of location, design, setting, feeling, workmanship, association, and materials:

- A. Associated with events that have made a significant contribution to the broad patterns of history.
- B. Associated with the lives of persons significant in our past.
- C. Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.

3.9 TRIBAL CULTURAL RESOURCES

D. Yield, or may be likely to yield, information important in prehistory or history.

National Historic Preservation Act

The National Historic Preservation Act supplements the provisions of the Antiquities Act of 1906 and established laws for historic resources to “preserve important historic, cultural, and natural aspects of our national heritage, and to maintain, wherever possible, an environment that supports diversity and a variety of individual choice.” The law makes it illegal to destroy, excavate, or remove from federal or Native American lands any archaeological resources without a permit from the land manager. Regulations for the ultimate disposition of materials recovered as a result of permitted activities state that archaeological resources excavated on public lands remain the property of the United States. Archaeological resources excavated from Native American lands remain the property of the Native American or Native American tribe having rights of ownership over such resources.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (United States Code, Title 16, Sections 470aa–mm) became law on October 31, 1979, and has been amended four times. It regulates the protection of archaeological resources and sites that are on federal and Native American lands.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (United States Code, Title 25, Sections 3001 et seq.) is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items (e.g., human remains, funerary objects, sacred objects, or objects of cultural patrimony) to lineal descendants and culturally affiliated Native American tribes.

STATE

Assembly Bill 52

The Native American Historic Resource Protection Act (Assembly Bill [AB] 52 took effect July 1, 2015, and incorporates tribal consultation and analysis of impacts to TCRs into the California Environmental Quality Act (CEQA) process. It requires TCRs to be analyzed like any other CEQA topic and establishes a consultation process for lead agencies and California tribes. Projects that require a notice of preparation of an EIR or notice of intent to adopt a negative declaration or mitigated negative declaration are subject to AB 52. A significant impact on a TCR is considered a significant environmental impact and requires feasible mitigation measures.

TCRs must have the following characteristics:

3.9 TRIBAL CULTURAL RESOURCES

1. Sites, features, places, cultural landscapes (must be geographically defined), sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources. (Public Resources Code [PRC] Section 21074(a)(1))
2. 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (PRC Section 21074[a][2])

The first category requires that the TCR qualify as a historical resource according to PRC Section 5024.1. The second category gives the lead agency discretion to qualify that resource—under the conditions that it supports its determination with substantial evidence and consider the resource’s significance to a California tribe. Following is a brief outline of the process, paraphrased from PRC Sections 21080.3.1 and 21080.3.2.

1. A California Native American tribe asks agencies in the geographic area with which it is traditionally and culturally affiliated to be notified about projects. Tribes must ask in writing.
2. Within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it.
3. A tribe must respond within 30 days of receiving the notification if it wishes to engage in consultation.
4. The lead agency must initiate consultation within 30 days of receiving the request from the tribe.
5. Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a tribal cultural resource, or a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached.

Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on TCRs and discuss feasible alternatives or mitigation that avoid or lessen the impact.

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the TCRs, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any

3.9 TRIBAL CULTURAL RESOURCES

information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. However, confidentiality does not apply to data or information that are, or become, publicly available; are already in lawful possession of the project applicant before the provision of the information by the California Native American tribe; are independently developed by the project applicant or the project applicant's agents; or are lawfully obtained by the project applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency.

California Public Resources Code Sections 21073 and 21074

PRC Sections 21073 and 21074 define California Native American tribe and TCRs, respectively. PRC Section 21073 defines a "California Native American tribe" as a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission.

TCRs are defined in Section 21074 as sites, features, places, cultural landscapes (geographically defined in terms of the size and scope), sacred places, and objects with cultural value to a California Native American tribe that are either included in or determined to be eligible for inclusion in the California Register of Historic Resources (CRHR), or are included in a local register of historical resources as defined in subdivision (k) of Section 5020.1, or are 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 Section 5024.1.

California Health and Safety Code

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 and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

California Register of Historical Resources

The CRHR is the state version of the NRHR program. It was enacted in 1992 and became official on January 1, 1993. The CRHR was established to serve as an authoritative guide to the state's significant historical and archaeological resources. Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. According to subsection (c) of

3.9 TRIBAL CULTURAL RESOURCES

PRC Section 5024.1, a resource may be listed as a historical resource in the CRHR if it meets any of the following four NRHR criteria:

1. Associated with events that have made a significant contribution to the broad patterns of history
2. Associated with the lives of persons significant in our past
3. Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction
4. Yield, or may be likely to yield, information important in prehistory or history

California State Historical Landmarks

California Historical Landmarks are buildings, structures, sites, or places that have been determined to have statewide historical significance by meeting at least one of the criteria listed below:

The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California)

Associated with an individual or group having a profound influence on the history of California

A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best-surviving work in a region of a pioneer architect, designer, or master builder

The resource also must have written consent of the property owner; be recommended by the State Historical Resources Commission; and be officially designated by the Director of California State Parks.

California State Points of Historical Interest

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historical resource may be designated as both a Landmark and a Point. If a Point is subsequently granted status as a Landmark, the Point designation will be retired. To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

3.9 TRIBAL CULTURAL RESOURCES

The first, last, only, or most significant of its type within the local geographic region (city or county)

Associated with an individual or group having a profound influence on the history of the local area

A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer or master builder

LOCAL

Encinitas General Plan

The City of Encinitas (City) General Plan provides the basis for the City's policies and represents the community's basic values, ideals, and aspirations. The General Plan establishes policies to guide development and conservation. Resource Management Element of the City General Plan includes the following policies related to TCRs:

- **Policy 7.1.** Require that paleontological, historical, and archaeological resources in the planning area are documented, preserved or salvaged if threatened by new development.
- **Policy 7.2.** Conduct a survey to identify historic structures and archaeological/cultural sites throughout the community and ensure that every action is taken to ensure their preservation.

3.9.2 Existing Conditions

Built Environment Evaluation

Two buildings on the project site (Building 1 and the Old Schoolhouse) are recommended eligible for listing in the NRHP and CRHR (Cogstone 2025).

- **Building 1.** Built in 1947 and includes offices and classrooms. Building 1 is a modern style building with Colonial Revival style elements. This building was designed by master architect Robert Rice Curtis. This building is recommended eligible for listing in the NRHP under Criterion C and CRHR under Criterion 3 as a unique example of a work by a master architect.
- **Old Schoolhouse.** Built in 1929 and includes classrooms. The Old Schoolhouse is a Mission Revival style building and was the second schoolhouse constructed in Encinitas. This building is recommended for listing in the NRHP under Criterion A and CRHR under Criterion 1. This building is also recommended eligible for listing in the NRHP under Criterion C and the CRHR under Criterion 3 as an exemplary representation of an architectural style.

3.9 TRIBAL CULTURAL RESOURCES

Building 1 and the Old Schoolhouse are found to be historically significant and eligible for listing in the NRHP and the CRHR. These two buildings are currently *recommended* eligible for listing and are not officially listed on any known historic resource register at the national, state, or local level (Cogstone 2025).

Historical Resources

The nearest historical resource to the project site is Cottonwood Creek, which is approximately 0.57 mile south of the project site (OHP 2025). Additionally, the closest historical resource, which is a Mills Act Contract property, listed in the Encinitas Register of Historic Places is approximately 0.32 mile southeast of the project site at 221 Sunset Drive (Encinitas 2025).

Tribal Consultation

The Encinitas Union School District (EUSD or District) has not received notification from Native American tribes to be notified of District projects. Therefore, tribal consultation pursuant to AB 52 was not conducted for the proposed project.

3.9.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, Environmental Checklist Form, of the CEQA Guidelines states that the proposed project would result in a significant impact related to tribal cultural resources if it would:

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
 - ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.9 TRIBAL CULTURAL RESOURCES

3.9.4 Project Impact Analysis

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

Cottonwood Creek and the property at 221 Sunset Drive are listed as historic resources, approximately 0.57 mile south and 0.32 mile southeast of the project site, respectively. The proposed project would occur within the boundaries of the project site and would not impact these resources.

As discussed in Section 3.3, *Cultural and Paleontological Resources*, Building 1 and the Old Schoolhouse are recommended eligible for listing in the NRHP and the CRHR. However, these buildings do not have tribal cultural significance as defined in PRC Section 21074.

Although no known TCRs have been identified on the project site, ground-disturbing activities as part of the proposed project have the potential to disturb subsurface deposits possessing traditional or cultural significance to Native American or other descendant communities. While the proposed project would occur within the project site boundaries, any grading beneath existing artificial fill could reach previously undisturbed soils where buried cultural resources may exist.

Additionally, to accommodate the temporary relocation of students during construction at the project site, temporary portable classrooms would be installed at Park Dale Lane Elementary School and El Camino Creek Elementary School, and minimal trenching would be required for utility connections. While it is unlikely that TCRs would be discovered during trenching activities given the previously disturbed soils and depth of trenching, the potential for discovery exists.

3.9 TRIBAL CULTURAL RESOURCES

Therefore, this impact is **potentially significant**. Mitigation Measure TCR-1 would be implemented to address the potential to encounter any TCRs during project-related ground-disturbing activities. With the implementation of Mitigation Measure TCR-1, potential impacts to TCRs would be reduced to less than significant.

Impact TCR-1: Implementation of the proposed project could cause a substantial adverse change in the significance of a TCR, pursuant to criteria set forth in Public Resources Code Section 5020.1(k).

Mitigation Measure TCR-1: If tribal cultural resources are encountered at Paul Ecke Elementary School, Park Dale Lane Elementary School, or El Camino Creek Elementary School during ground-disturbing activities, the District shall retain a tribal monitor who shall only be present on-site during the construction phases that involve ground-disturbing activities. The tribal monitor shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the ground-disturbing activities are completed or when the tribal monitor has indicated that the project site has a low potential for affecting tribal cultural resources.

Upon discovery of any tribal cultural resources, construction activities shall cease in the immediate vicinity of the find until the tribal monitor can assess the find. The evaluation of all tribal cultural resources unearthed by project construction activities shall be evaluated by a qualified archaeologist and/or tribal monitor. If the resources are Native American in origin, the tribal monitor shall coordinate with the District regarding treatment and curation of these resources as well as notifying local tribes of the find. Typically, the tribe(s) shall request reburial or preservation for educational purposes. The District may continue work on other parts of the project site while evaluation and, if necessary, mitigation take place (CEQA Guidelines Section 15064.5[f]).

If the tribal monitor determines a resource to constitute a "historical resource" or "unique archaeological resource," time and funding sufficient to allow for implementation of avoidance measures or appropriate mitigation must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Section 21083.2(b) for unique archaeological resources. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource. The District shall be responsible for ensuring that a public, nonprofit institution with a research interest in the materials curate any historic archaeological material that is not Native American in origin if such an institution agrees to accept the material. If no institution accepts the archaeological material, the District shall offer it to a local historical society for educational purposes or retain the material and use it for educational purposes.

3.9 TRIBAL CULTURAL RESOURCES

Significance with Mitigation: Less-than-Significant Impact.

3.9.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to tribal cultural resources?

Each related cumulative project would be required to comply with CEQA Guidelines Section 15064.5, which addresses accidental discoveries of archaeological sites and resources, including TCRs. The proposed project's implementation of Mitigation Measure TCR-1 would ensure that in the event TCRs are uncovered during project-related ground-disturbing activities, the proper protocol would be followed to minimize impacts. Therefore, any discoveries of TCRs caused by the proposed project or related projects would be mitigated to a less-than-significant level. Therefore, the proposed project's impacts would not be cumulatively considerable.

Significance with Mitigation: Less-than-Significant Impact.

3.9.6 References

California Office of Historic Preservation (OHP). 2025, September 9 (accessed). California Historical Resources.
<https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=37>.

Cogstone. 2025, July. Cultural Resources Assessment for the Paul Ecke Central Elementary School Project, City of Encinitas, San Diego County, California. (Appendix 3.3-1)

Encinitas, City of. 2025, September 9 (accessed). Encinitas Register of Historic Places.
<https://www.encinitasca.gov/home/showpublisheddocument/1598/638327122577300000>

4. ALTERNATIVES TO THE PROPOSED PROJECT

4.1 INTRODUCTION

This chapter presents the alternatives analysis for the Paul Ecke Central Elementary School Rebuild Project (proposed project), as required by the California Environmental Quality Act (CEQA). CEQA requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6[a]).

The discussion includes an explanation of the methodology used to select alternatives to the proposed project, with the intent of identifying potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified for the proposed project while still meeting most of the basic project objectives, pursuant to CEQA Guidelines Section 15126.6(a). This chapter identifies a reasonable range of alternatives that meet these criteria, and these alternatives are evaluated with respect to minimizing adverse environmental effects as compared to the proposed project. It also describes other alternatives and alternative concepts that were considered but eliminated from detailed consideration and the reasons for their elimination. For the alternatives selected for analysis, this chapter evaluates the impacts of the alternatives against baseline environmental conditions and compares the potential impacts of the alternatives with those of the proposed project. Finally, as required under CEQA Guidelines Section 15126.6(e), based on this analysis, this chapter then discusses the Environmentally Superior Alternative.

The discussion in this chapter is intended to inform the public and decision makers of feasible alternatives to the proposed project that would avoid or substantially lessen any of the significant effects of the proposed project. Section 15126.6, “Consideration and Discussion of Alternatives to the Proposed Project,” of the CEQA Guidelines states that:

An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for

4. ALTERNATIVES TO THE PROPOSED PROJECT

selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. (Section 15126.6[a])

4.2 FACTORS CONSIDERED WHEN DEVELOPING ALTERNATIVES

This section describes the basis for determining the range of CEQA alternatives and identifies the specific alternatives that are analyzed in this Draft EIR. The primary factors considered when determining feasible alternatives to the proposed project are the identified project objectives and the significant impacts that have been identified for the proposed project.

4.2.1 Project Objectives

Chapter 2, Section 2.5, *Statement of Project Objectives*, lists the objectives that have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts. The following specific objectives have been identified for the proposed project:

- Rebuild and modernize the campus to enhance and facilitate students' learning environment.
- Upgrade outdoor collaboration spaces adjacent to classrooms to provide improved learning experiences.
- Address on-site utility, energy efficiency, and drainage issues.
- Balance preservation of the Old Schoolhouse Building with the District's need to address safety, accessibility, and operational requirements.
- Improve circulation, access, and functionality, and reduce off-site congestion by increasing on-site parking.

4.2.2 Significant Impacts

Apart from the No Project Alternative, alternatives to a project should be evaluated because of their ability to feasibly attain most of the basic objectives of the project and avoid or lessen the project's identified significant impacts. The proposed project would result in seven significant impacts.

4. ALTERNATIVES TO THE PROPOSED PROJECT

LESS-THAN-SIGNIFICANT IMPACTS WITH MITIGATION

The following impacts were found to be less than significant with implementation of mitigation measures.:

- **Impact AIR-1:** The proposed project would result in an exceedance of cancer health risk impacts for the maximally exposed residential receptor.
- **Impact CUL-2:** Ground-disturbing activities onsite have the potential to unearth and cause a substantial impact to unknown archaeological resources.
- **Impact CUL-3:** Ground-disturbing activities onsite have the potential to unearth and destroy unknown paleontological resources.
- **Impact HAZ-1:** In the event recognized environmental conditions (RECs) within the soil exceed applicable screening or action levels established by Department of Toxic Substances Control (DTSC), reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment could occur.
- **Impact NOI-1:** Construction activities associated with the proposed project occurring near sensitive receptors would create a substantial temporary increase in ambient noise levels.
- **Impact TCR-1:** Implementation of the proposed project could cause a substantial adverse change in the significance of a tribal cultural resource, pursuant to criteria set forth in Public Resources Code Section 5020.1(k).

SIGNIFICANT AND UNAVOIDABLE IMPACTS

The following impacts were found to be significant and unavoidable even with implementation of mitigation measures:

- **Impact CUL-1:** Improvements to the Old Schoolhouse would result in the loss of its recommended historic eligibility for listing on the NRHP and CRHR.

4. ALTERNATIVES TO THE PROPOSED PROJECT

4.3 ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines Section 15126.6(c) requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. CEQA Guidelines Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. The following is a discussion of alternatives considered and rejected, along with the reasons that alternative was not included in the analysis.

4.3.1 Alternative Development Area

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126.6[f][2][A]). The following factors are key in evaluating the feasibility of potential off-site locations for EIR project alternatives:

- If it is in the same jurisdiction
- Whether development as proposed would require a general plan amendment
- Whether the project applicant could reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). (CEQA Guidelines Section 15126.6[f][1])

The Alternative Development Area Alternative would result in the development of the proposed project on an alternate site. The proposed project by design is intended to rebuild the Paul Ecke Central Elementary School campus to include modernized buildings and amenities. Consequently, an alternative off-site location is not a feasible alternative and would not meet the project objectives. Therefore, an alternative project site would not meet the project objectives and was eliminated from detailed consideration.

4. ALTERNATIVES TO THE PROPOSED PROJECT

4.4 ALTERNATIVES SELECTED FOR ANALYSIS

The following alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the objectives of the proposed project and that may avoid or substantially lessen any of the significant impacts of the proposed project:

- Alternative 1: No Project Alternative
- Alternative 2: Partial Reconstruction Alternative
- Alternative 3: Large-Scale Modernization Alternative

4.5 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

The CEQA Guidelines require analysis of a No Project Alternative to compare the impacts of approving a project against the impacts of not approving it. This alternative must discuss existing conditions and what would reasonably be expected to occur in the foreseeable future, consistent with current plans and available services. Under the No Project Alternative, the Encinitas Union School District (District) would not approve or implement any portion of the proposed project, and none of the mitigation measures identified in this DEIR would be necessary.

None of the proposed improvements would occur, and the project site would continue to operate under its current conditions and existing layout. The underlying issues with utilities, energy efficiency, drainage, and circulation and the need for modernized facilities would remain unaddressed. The Old Schoolhouse would not be retrofitted, and the campus would not be modernized. The temporary relocation of students or faculty to off-site schools, the temporary relocation of the Leucadia Farmers Market to an off-site location, and all planned off-site traffic and utility improvements would not be implemented.

4.5.1 Aesthetics

Under the No Project Alternative, the District would not implement the proposed project. The existing site conditions, including the current layout, buildings, and parking areas would remain unchanged. Since no construction, building modifications, or changes to the site's operations would occur, this alternative would not enhance the visual character of the project site. The existing sources and levels of light and glare from the project site would not increase. While construction impacts would be less under this alternative, operational impacts of the No Project Alternative would increase the aesthetic impacts identified for the proposed project as this alternative would not enhance the project site's visual state. Impacts under this alternative would be greater than those of the proposed project.

4. ALTERNATIVES TO THE PROPOSED PROJECT

4.5.2 Air Quality

No construction would occur under this alternative; therefore, no construction-related air quality impacts would occur. Construction-related impacts would be less than the impacts identified for the proposed project. Operation (i.e., student enrollment, staffing, and general operational characteristics) under this alternative would remain similar to the proposed project. Overall, the No Project Alternative would result in air quality impacts that are less than those of the proposed project.

4.5.3 Cultural and Paleontological Resources

No demolition or new construction would occur under this alternative. Therefore, the buildings on the project site, including Building A and the Old Schoolhouse, which have been identified as eligible for historic designation, would remain intact. All potential construction-related impacts to cultural and paleontological resources would be avoided. Operation under this alternative would be the similar to the proposed project. Overall, the No Project Alternative would avoid the significant and unavoidable impact to historical resources associated with the proposed project. Impacts under this alternative would be less than those of the proposed project.

4.5.4 Energy

No new construction activities would occur under the No Project Alternative. Therefore, the temporary energy consumption associated with demolition, equipment operation, and the transportation of materials and relocated students would be avoided. Construction-related energy impacts under this alternative would be less than the impacts of the proposed project. The project site would continue to operate in its current state with less-efficient buildings and systems, and no conversion to an all-electric design or installation of new photovoltaic systems would occur. Overall, the No Project Alternative would avoid the temporary construction energy impacts of the proposed project but would result in greater operational impacts compared to the proposed project. Impacts under this alternative would be greater than those of the proposed project.

4.5.5 Greenhouse Gas Emissions

No new construction activities, including demolition, grading, and building construction, would occur under the No Project Alternative. Therefore, all temporary construction-related greenhouse gas emissions from equipment, material transport, and the temporary trips associated with student relocation under the proposed project would be avoided. Construction impacts under this alternative would be less than the impacts of the proposed project. This alternative would not achieve the benefits associated with the proposed all-electric buildings of

4. ALTERNATIVES TO THE PROPOSED PROJECT

the proposed project. Overall, the No Project Alternative would avoid the temporary construction greenhouse gas emission impacts of the proposed project but would result in greater operational impacts compared to the proposed project. Impacts under this alternative would be greater than those of the proposed project.

4.5.6 Hazards and Hazardous Materials

No new construction would occur under the No Project Alternative; therefore, there would be no ground-disturbing or demolition activities that could release and/or expose hazardous materials during construction activities compared to the proposed project. Operational activities under this alternative would be similar to the proposed project. Therefore, impacts under this alternative would be less than the proposed project.

4.5.7 Noise

No construction noise impacts would occur under the No Project Alternative; therefore, the construction noise impacts would be less than the proposed project. Operational noise under the No Project Alternative would be similar to the impacts of the proposed project. Overall, the No Project Alternative would result in less noise impacts than the proposed project.

4.5.8 Transportation

There would be no construction under the No Project Alternative, and therefore there would be no impacts as a result of construction-related traffic or the temporary increase in vehicle miles traveled from the temporary student relocation as with the proposed project. Operation of the project site would remain the same under this alternative, compared to existing conditions, and therefore, no changes to access, pedestrian safety, circulation, or parking, as proposed by the proposed project, would occur. Overall, impacts would be greater than the proposed project.

4.5.9 Tribal Cultural Resources

The No Project Alternative would not include any ground-disturbing activities; therefore, potential construction-related impacts to subsurface unknown tribal cultural resources at the project site would be entirely avoided. Operational impacts of this alternative would be similar to the proposed project. Overall, the No Project Alternative would eliminate the proposed project's tribal cultural resources impacts, and impacts under this alternative would be less than those of the proposed project.

4. ALTERNATIVES TO THE PROPOSED PROJECT

4.5.10 Relationship to Project Objectives

Under the No Project Alternative, none of the objectives for the proposed project would be met.

4.6 ALTERNATIVE 2: PARTIAL RECONSTRUCTION ALTERNATIVE

Under this alternative, portions of the campus would be reconstructed, and Building A (Administration Building) and the Old Schoolhouse would be retrofitted with limited exterior upgrades and major interior upgrades. Because Building A would not be demolished, the configuration of Building A would limit the District's ability to redesign the rest of the campus, and therefore, some campuswide amenities would not be constructed.

4.6.1 Aesthetics

Under this alternative, only portions of the campus would be reconstructed, with other buildings and amenities either minimally upgraded or not constructed at all. While this alternative would still improve the overall aesthetics and character of the project site, compared to existing conditions, it would not improve the visual state of the project site to the same extent as the proposed project. Therefore, impacts under this alternative would be greater than the proposed project.

4.6.2 Air Quality

Under this alternative, there would be less construction and demolition activities compared to the proposed project. Overall operational impacts under this alternative would be similar to the proposed project. Therefore, this alternative would result in less air quality impacts compared to the proposed project.

4.6.3 Cultural and Paleontological Resources

Under this alternative, ground-disturbing activities would occur during construction and would have similar impacts as the proposed project. However, while Building A would not be demolished, exterior retrofits to both Building A and the Old Schoolhouse could still result in the loss of major character defining features of the buildings, and significant impacts to historic resources would occur under this alternative. Overall, this alternative would result in similar impacts to cultural and paleontological resources compared to the proposed project.

4. ALTERNATIVES TO THE PROPOSED PROJECT

4.6.4 Energy

Under this alternative, portions of the campus would be rebuilt, and Building A and the Old Schoolhouse would be retrofitted. Construction energy would be slightly reduced compared to the proposed project as there would be less construction. As this alternative would not rebuild the entire campus, including Building A, energy usage during operations would be greater than the proposed project. Overall, impacts would be greater compared to the proposed project.

4.6.5 Greenhouse Gas Emissions

Under this alternative, there would be fewer construction and demolition activities compared to the proposed project. As this alternative would not rebuild the entire campus, including Building A, greenhouse gas emissions during operations would be greater than the proposed project. Overall, impacts would be greater compared to the proposed project.

4.6.6 Hazards and Hazardous Materials

As with the proposed project, ground-disturbance and demolition activities that could release and/or expose hazardous materials during construction activities would occur under this alternative. Operational activities under this alternative would be similar to the proposed project. Therefore, impacts under this alternative would be similar to the proposed project.

4.6.7 Noise

Under this alternative, there would be fewer construction and demolition activities compared to the proposed project. Overall operational impacts under this alternative would be similar to the proposed project. Therefore, this alternative would result in less noise impacts compared to the proposed project.

4.6.8 Transportation

Construction activities would still occur under this alternative, and therefore, impacts as a result of construction-related traffic would be similar to the proposed project. Operation of the campus would be the same as the proposed project under this alternative. Therefore, this alternative would result in similar transportation impacts compared to the proposed project.

4.6.9 Tribal Cultural Resources

Under this alternative, there would be fewer construction and demolition activities compared to the proposed project. Overall operational impacts under this alternative would be similar to

4. ALTERNATIVES TO THE PROPOSED PROJECT

the proposed project. Therefore, this alternative would result in less tribal cultural resources impacts compared to the proposed project.

4.6.10 Relationship to Project Objectives

Alternative 2, Partial Reconstruction Alternative, would meet all of the project objectives but to a lesser extent, since the configuration of Building A would limit the District's ability to redesign the rest of the campus. Therefore, some campuswide amenities would not be constructed.

4.7 ALTERNATIVE 3: LARGE-SCALE MODERNIZATION ALTERNATIVE

Under the Alternative 3, Large-Scale Modernization Alternative, the District would modernize the campus as follows:

- Remove and replace the existing five portable/modular classrooms
- Complete site sewer system reconstruction
- Remodel bathrooms
- Install new flooring
- Upgrade HVAC systems
- Improve landscaping
- Renovate drainage systems
- Reconfigure building interior spaces to make all classrooms compliant with the California Education Code for square footage compliance
- Address parking challenges
- Reconfigure and modernize Building A
- Provide additional outdoor learning spaces
- Install new, upgraded playgrounds
- Install new roofing
- Update classroom finishes
- Upgrade fire alarm system

Because completing all of these modernization improvements would have pushed the District past the 50 percent threshold of the cost for a new build, this alternative would trigger seismic upgrades being required, per state law. Making the seismic improvements in addition to the modernization improvements would not have been a cost-effective approach or a good value project for the District.

4. ALTERNATIVES TO THE PROPOSED PROJECT

4.7.1 Aesthetics

Under this alternative, the campus would be modernized; however, as a complete rebuild would not occur, the visual character of the campus would not be enhanced to the same extent as the proposed project. Overall, impacts would be greater than the proposed project.

4.7.2 Air Quality

Under this alternative, there would be fewer construction and demolition activities compared to the proposed project. Overall operational impacts under this alternative would be similar to the proposed project. Therefore, this alternative would result in less air quality impacts compared to the proposed project.

4.7.3 Cultural and Paleontological Resources

Under this alternative, ground-disturbing activities would occur during construction and would have similar impacts as the proposed project. However, while Building A would not be demolished, exterior retrofits to both Building A and the Old Schoolhouse could still result in the loss of major character defining features of the buildings, and significant impacts to historic resources would occur under this alternative. Overall, this alternative would result in similar impacts to cultural and paleontological resources compared to the proposed project.

4.7.4 Energy

Under this alternative, the campus would be modernized. Construction energy would be reduced compared to the proposed project as there would be fewer construction activities. As this alternative would not rebuild the entire campus, energy usage during operations would be greater than the proposed project as the buildings would not be designed to be all-electric. Overall, impacts would be greater than the proposed project.

4.7.5 Greenhouse Gas Emissions

Under this alternative, there would be fewer construction and demolition activities compared to the proposed project. Overall operational impacts under this alternative would be greater than the proposed project as the buildings would not be designed to be all-electric. Therefore, this alternative would result in greater greenhouse gas emission impacts compared to the proposed project.

4. ALTERNATIVES TO THE PROPOSED PROJECT

4.7.6 Hazards and Hazardous Materials

As with the proposed project, ground-disturbance and demolition activities that could release and/or expose hazardous materials during construction activities would occur under this alternative. Operational activities under this alternative would be similar to the proposed project. Therefore, impacts under this alternative would be similar to the proposed project.

4.7.7 Noise

Under this alternative, there would be fewer construction and demolition activities compared to the proposed project. Overall operational impacts under this alternative would be similar to the proposed project. Therefore, this alternative would result in less noise impacts compared to the proposed project.

4.7.8 Transportation

While construction activities would still occur under this alternative, impacts as a result of construction-related traffic would be less than the proposed project due to the reduced construction activities. Operation of the campus would be the same as the proposed project under this alternative. Therefore, this alternative would result in similar transportation impacts compared to the proposed project.

4.7.9 Tribal Cultural Resources

Under this alternative, there would be fewer construction and demolition activities compared to the proposed project. Overall operational impacts under this alternative would be similar to the proposed project. Therefore, this alternative would result in less tribal cultural resources impacts compared to the proposed project.

4.7.10 Relationship to Project Objectives

Alternative 3, Large-Scale Modernization Alternative, would meet all of the project objectives but to a lesser extent.

4. ALTERNATIVES TO THE PROPOSED PROJECT

4.8 SUMMARY OF ALTERNATIVES EVALUATION

Table 4-1, *Comparison of Project Alternative Impacts*, compares the impact of each alternative to impacts of the proposed project. The impacts of each alternative are classified as having a reduced (↓), similar or comparable to (=), or greater (↑) level of impact when compared to the proposed project.

Table 4-1 Comparison of Project Alternative Impacts

Environmental Topic	Proposed Project ¹	Alternative 1: No Project Alternative	Alternative 2: Partial Reconstruction Alternative	Alternative 3: Large-Scale Modernization Alternative
3.1 Aesthetics	LTS	↑	↑	↑
3.2 Air Quality	LTS/M	↓	↓	↓
3.3 Cultural and Paleontological Resources	SU	↓	=	=
3.4 Energy	LTS	↑	↑	↑
3.5 Greenhouse Gas Emissions	LTS	↑	↑	↑
3.6 Hazards and Hazardous Materials	LTS/M	↓	=	=
3.7 Noise	LTS/M	↓	↓	↓
3.8 Transportation	LTS	↑	=	=
3.9 Tribal Cultural Resources	LTS/M	↓	↓	↓

¹ The impacts listed in this column represent the highest significance determination for each respective topic.

NI No Impact

LTS Less-than-Significant Impact

LTS/M Less-than-Significant Impact with Mitigation

SU Significant and Unavoidable Impact

↓ Reduced impact in comparison to the proposed project

= Similar impact in comparison to the proposed project

↑ Greater impact in comparison to the proposed project

Table 4-2, *Ability to Meet Proposed Project Objectives*, identifies the ability of each of the project alternatives to meet the proposed project's objectives.

4. ALTERNATIVES TO THE PROPOSED PROJECT

Table 4-2 Ability to Meet Proposed Project Objectives

Objective	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Partial Reconstruction Alternative	Alternative 3: Large-Scale Modernization Alternative
Rebuild and modernize the campus to enhance and facilitate students' learning environment.	Yes	No	Yes, but to a lesser extent	Yes, but to a lesser extent
Upgrade outdoor collaboration spaces adjacent to classrooms to provide improved learning experiences.	Yes	No	Yes, but to a lesser extent	Yes, but to a lesser extent
Address on-site utility, energy efficiency, and drainage issues.	Yes	No	Yes, but to a lesser extent	Yes, but to a lesser extent
Balance preservation of the Old Schoolhouse Building with the District's need to address safety, accessibility, and operational requirements.	Yes	No	Yes	Yes
Improve circulation, access, functionality, and reduce off-site congestion by increasing on-site parking.	Yes	No	Yes, but to a lesser extent	Yes, but to a lesser extent

4.8.1 Summary of Alternative 1: No Project Alternative

The No Project Alternative would not include ground-disturbing activities and would eliminate all of the proposed project potentially significant and significant and unavoidable impacts. All construction activities would be avoided under this alternative. Overall, this alternative would result in reduced impacts to air quality, cultural and paleontological resources, hazards and hazardous materials, noise, and tribal cultural resources and would result in greater impacts to aesthetics, energy, greenhouse gas emissions, and transportation compared to the proposed project (Table 4-1). This alternative would not meet any of the project objectives (Table 4-2).

4.8.2 Summary of Alternative 2: Partial Reconstruction Alternative

Alternative 2, Partial Reconstruction Alternative, would only rebuild portions of the campus, and would retrofit Building A and the Old Schoolhouse. Exterior retrofits to both Building A and the Old Schoolhouse could still result in the loss of major character defining features of the buildings, and significant impacts to historic resources would occur under this alternative. Overall, this alternative would result in greater impacts to aesthetics, energy, and greenhouse gas emissions, less impacts to air quality, noise, and tribal cultural resources, and similar

4. ALTERNATIVES TO THE PROPOSED PROJECT

impacts to cultural and paleontological resources, hazards and hazardous materials, and transportation compared to the proposed project (Table 4-1). This alternative would meet the project objectives, but to a lesser extent, except for Objective 4 – Balance preservation of the Old Schoolhouse Building with the District’s need to address safety, accessibility, and operational requirements, which this alternative would meet (Table 4-2).

4.8.3 Summary of Alternative 3: Large-Scale Modernization Alternative

The Large-Scale Modernization Alternative would not rebuild the campus but instead would modernize the campus. Exterior retrofits to both Building A and the Old Schoolhouse could still result in the loss of major character defining features of the buildings, and significant impacts to historic resources would occur under this alternative. Overall, this alternative would result in greater impacts to aesthetics, energy, and greenhouse gas emission, reduced impacts to air quality, noise, and tribal cultural resources, and similar impacts to cultural and paleontological resources, hazards and hazardous materials, and transportation compared to the proposed project (Table 4-1). This alternative would meet the project objectives, but to a lesser extent, except for Objective 4 – Balance preservation of the Old Schoolhouse Building with the District’s need to address safety, accessibility, and operational requirements, which this alternative would meet (Table 4-2).

4.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, CEQA Guidelines Section 15126.6 requires that an “environmentally superior” alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative to the proposed project that would be expected to generate the least number of significant impacts. Identification of the environmentally superior alternative is an informational procedure, and the alternative to the proposed project selected may not be the alternative to the proposed project that best meets the goals or needs of the Encinitas Union School District. Because CEQA Guidelines Section 15126.6(c) requires an evaluation of a reasonable range of alternatives to the proposed project, the proposed project under consideration cannot be identified as the environmentally superior alternative. Additionally, in accordance with CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

Alternative 2, Partial Reconstruction Alternative, is identified as the environmentally superior alternative. As this alternative would result in portions of the campus being rebuilt, many of the proposed improvements envisioned under the proposed project would still be constructed

4. ALTERNATIVES TO THE PROPOSED PROJECT

under this alternative. For example, under this alternative, rebuilt buildings would be designed to be all electric. However, while Building A would not be demolished, exterior retrofits to both Building A and the Old Schoolhouse could still result in the loss of major character defining features of the buildings, and significant impacts to historic resources would continue to occur under this alternative. Overall, this alternative meets the project objectives, to a lesser extent, and includes most of the components of the proposed project.

5. OTHER CEQA CONSIDERATIONS

This chapter provides a discussion of the effects found not to be significant, significant and unavoidable impacts, significant irreversible changes to the environment, and growth-inducing effects. A more detailed analysis of the effects that the proposed project would have on the environment and proposed mitigation measures to minimize significant impacts are provided in Chapter 3, *Environmental Analysis*, of this Draft Environmental Impact Report (DEIR).

5.1 EFFECTS NOT FOUND TO BE SIGNIFICANT

California Environmental Quality Act (CEQA) Guidelines Section 15128, Effects Not Found to Be Significant, allows environmental issues for which there is no likelihood of significant impact to be “scoped out” and not analyzed further in the EIR. Based on the comments received during the Notice of Preparation (NOP) comment period (Appendix 1-1, *NOP and NOP Comment Letters*, of this Draft EIR), it was determined that the proposed project would not result in significant environmental impacts related to the following environmental impact topics, and they are not analyzed in Chapter 3, *Environmental Analysis*, of this Draft EIR.

5.1.1 Agriculture and Forestry Resources

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

No Impact. According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the project site is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; the project site and its surroundings are designated Urban and Built-Up Land (DOC 2025a). The proposed project involves the reconstruction of an existing public school within the project site boundaries. Therefore, the proposed project would not convert designated farmland to non-agricultural uses, and no impact would occur.

Significance Before Mitigation: No Impact.

- b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is designated Public/Semi-Public (P/SP) and zoned Public/Semi-Public (N-P/SP) (Encinitas 2025a; Encinitas 2025b). The project site is not zoned for agricultural

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use, and there are no Williamson Act contracts under effect at the project site (DOC 2025b). The project site currently operates as a school and would continue to operate as such after project implementation. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

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

No Impact. The project site is within a fully urbanized area in the City of Encinitas and has operated as a school since the late 1920s. The project site is designated Public/Semi-Public (P/SP) and zoned Public/Semi-Public (N-P/SP), and therefore, is not zoned for forestry or timber production. Per the California Department of Fish and Wildlife, there are no forestlands or timberlands on the project site or surrounding areas (CDFW 2025a). The proposed project would not conflict with any forestry zoning or cause the rezoning of any land classified for timber production. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

- d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project site operates as a school and is within an urbanized area. There are no forestlands on site, and therefore, the proposed project would not result in the loss or conversion of forestlands. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

- e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to nonagricultural use or conversion to forest land to non-forest use?

No Impact. The project site operates as a school and is zoned Public/Semi-Public (N-P/SP). The project site is within an urbanized area, and proposed improvements would occur within the project site boundaries. The proposed project would not result in the conversion of farmland or forestlands to non-agricultural or non-forest uses. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

5. OTHER CEQA CONSIDERATIONS

5.1.2 Biological Resources

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

Less-than-Significant Impact. The project site and surroundings are disturbed with developed uses and are subject to daily human disturbances. The project site is fully developed with a school campus and is within an urbanized area. There is no suitable breeding or foraging habitat onsite for any sensitive species. The proposed project would not result in direct or indirect candidate, sensitive, or special-status species or elimination or modification of any natural habitat, which may provide for any sensitive or special status species. Impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

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

No Impact. The project site is developed with a school campus and has no riparian habitats or sensitive natural communities (USFWS 2025a). Therefore, the proposed project would have no impact on sensitive natural communities.

Significance Before Mitigation: No Impact.

- c) Would the project 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. There are no wetlands or other jurisdictional waters present on the project site (USFWS 2025a). The project site is entirely developed with a school campus and is surrounded by urbanized uses. The proposed project would not involve any discharge of dredged or fill material into waters of the United States or the state. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

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

5. OTHER CEQA CONSIDERATIONS

Less-than-Significant Impact. The project site is within an urbanized area of the City of Encinitas and is developed with a school campus. Construction and operation of the proposed project would be limited to the project site boundaries. No federally designated critical habitat exists onsite or in the vicinity of the project site (USFWS 2025b). If the proposed project would remove trees, it would be required to comply with the Migratory Bird Treaty Act, which prohibits the take (e.g., killing, capturing, selling, trading, and transport) of protected migratory bird species without authorization from the U.S. Fish and Wildlife Service. Therefore, impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

- e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The project site and surroundings are disturbed with developed uses and are subject to daily human disturbances. The project site is fully developed with a school campus and is within an urbanized area. The City of Encinitas' Municipal Code Chapter 15.02, Municipal Tree Ordinance, is intended to promote and protect the general welfare by providing for the regulation of the planting, management, maintenance, preservation, and where necessary, removal of public or heritage trees. There are no heritage trees on site, and the proposed project would not remove trees within the City's right-of-way. The proposed project would remove trees on site; however, the proposed project would include a net increase of trees on site compared to existing conditions. Therefore, the proposed project would not conflict with local policies or ordinances, and no impact would occur.

Significance Before Mitigation: No Impact.

- f) Would the project 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 within the San Diego County Water Authority Natural Community Conservation Plan and Habitat Conservation Plan; however, there are no federally designated critical habitat exists onsite or in the vicinity of the project site (CDFW 2025b; USFWS 2025b). The project site is within an urbanized area and currently operates as a school campus and would continue to operate as such after project completion. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

5. OTHER CEQA CONSIDERATIONS

5.1.3 Geology and Soils

- a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)
 - ii) Strong seismic ground shaking?
 - iii) Seismic-related ground failure, including liquefaction?
 - iv) Landslides?

Less-than-Significant Impact. According to the California Geological Survey, the project site is not within an Alquist-Priolo Earthquake Fault Zone, and there is no evidence of a known active fault traversing the project site (DOC 2025c). Therefore, surface fault rupture is not a concern. However, the project site is susceptible to strong seismic ground shaking from regional faults, such as the Newport-Inglewood-Rose Canyon fault zone, which is approximately 14.25 miles south of the project site (DOC 2025c). The proposed project would comply with the California Building Code (CBC) and Division of the State Architect (DSA) criteria for seismic safety. Additionally, the project site is generally flat and not within a liquefaction or landslide zone (DOC 2025c). Additionally, to accommodate the temporary relocation of students during construction at the project site, temporary portable classrooms would be installed at Park Dale Lane Elementary School and El Camino Creek Elementary School; the installation of these portable classrooms would meet the applicable requirements of the CBC and DSA. Overall, impacts related to seismic activity, liquefaction, and landslides are considered less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

- b) Would the project result in substantial soil erosion or the loss of topsoil?

Less-than-Significant Impact. The project site is generally flat, which decreases the proposed project's potential to accelerate erosion. The project site is currently developed with a school and construction activities, including demolition, grading, and excavation, would have the potential to cause soil erosion and the loss of topsoil if not properly managed. As the area of disturbance is greater than one acre, the proposed project would be subject to the National Pollutant Discharge Elimination System permit requirements. These include the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which would include best management practices (BMPs) such as silt fences, straw wattles, and temporary seeding to

5. OTHER CEQA CONSIDERATIONS

control erosion and sedimentation. Additionally, adherence with existing state requirements regulating construction activities, such as the CBC and DSA review, would minimize soil erosion. Additionally, to accommodate the temporary relocation of students during construction at the project site, temporary portable classrooms would be installed at Park Dale Lane Elementary School and El Camino Creek Elementary School; the installation of these portable classrooms would meet the applicable requirements of the CBC and DSA, and BMPs would be implemented as needed. Therefore, the proposed project would not result in substantial erosion or loss of topsoil, and a less-than-significant impact would occur.

Significance Before Mitigation: Less-than-Significant Impact.

- c) Would the project 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?

No Impact. As discussed in Impact 5.1.3(a), the project site is not within a landslide or liquefaction zone. Lateral spreading occurs when non-liquefied soil moves downslope; because the project site is generally flat, lateral spreading impacts would not occur. According to the Area of Land Subsidence in California Mapper, the project site is not within an area of recorded subsidence due to groundwater pumping. As such, subsidence and collapse would not occur (USGS 2025). The proposed project would be constructed in compliance with the applicable CBC and DSA requirements. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

- d) Would the project 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?

No Impact. According to the United States Department of Agriculture's Web Soil Survey, the project site consists of Marina Loamy Coarse Sand with a linear extensibility percentage of 1.5, which is considered low (USDA 2025; UCD 2025). Therefore, the project site has a low shrink-swell potential, which indicates that the soils are not susceptible to expansion. Nonetheless, the proposed project would be constructed to meet the requirements of the CBC and DSA. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

- e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

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No Impact. The proposed project would not require installation of a septic tank or alternative wastewater disposal system. The proposed project would utilize the local sewer system. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

5.1.4 Hydrology and Water Quality

- a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less-than-Significant Impact. Construction activities could 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. The refueling and parking of construction vehicles and other equipment onsite during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system. To minimize these potential impacts, the proposed project would be required to comply with the National Pollutant Discharge Elimination System Construction General Permit (CGP) as well as prepare a SWPPP that requires the incorporation of BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. The CGP requires that prior to the start of construction activities, the District must file permit registration documents (PRDs) with the State Water Resources Control Board (SWRCB), which include a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. The construction contractor is required to maintain a copy of the SWPPP on site at all times and implement all construction BMPs identified in the SWPPP during construction activities. Prior to commencement of grading activities, the District is required to provide proof of filing of PRDs with the SWRCB, which include preparation of SWPPP.

The SWPPP must describe construction BMPs that address pollutant source reduction and provide measures/controls to mitigate potential pollutant sources that include, but are not limited to, erosion controls, sediment controls, tracking controls, non-stormwater management, materials and waste management, and good housekeeping practices. Construction BMPs examples include soil binders, straw mulch, velocity dissipation devices, slope drains, sediment basin, sediment trap, sandbag barrier, straw bale barrier, storm drain inlet protection, and chemical dust suppressants. Submittal of the PRDs and implementation of the SWPPP and its associated BMPs throughout the construction phase would result in an impact of less than significant. Additionally, to accommodate the temporary relocation of students during construction at the project site, temporary portable classrooms would be installed at Park Dale Lane Elementary School and El Camino Creek Elementary School; the installation of these portable classrooms would implement applicable BMPs.

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Once the proposed project has been constructed, urban runoff could include a variety of contaminants that are typical of the operation of a school. The proposed project would implement operational BMPs to control the amount and quality of stormwater leaving the project site. Also, the proposed project would be required to comply with all applicable federal and state laws governing the use, storage, transport, and disposal of hazardous materials, which would ensure impacts are less than significant. Therefore, the proposed project would not violate any water quality standards, and impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

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

No Impact. The San Dieguito Water District supplies water to the project site. The project site does not contain any wells or direct groundwater connections, and the proposed project would not increase student capacity. The new buildings onsite would include new utilities and plumbing infrastructure which would be more water-efficient than the infrastructure currently at the project site. Therefore, the proposed project is not anticipated to create a need for an increase in pumping of groundwater resources. As such, no impact would occur.

Significance Before Mitigation: No Impact.

- c) Would the project substantially alter the existing drainage pattern of the project 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?
 - ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
 - iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
 - iv) impede or redirect flood flows?

Less-than-Significant Impact. Erosion and siltation impacts that could result from alteration of the drainage patterns would, for the most part, occur during the proposed project's construction phase, which would include site preparation and grading activities. The proposed project would not involve the alteration of any natural drainage channels or any watercourse. The proposed project's earthwork activities may include grading and utilities trenching. If not

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controlled, the transport of these materials to local waterways would temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways. The proposed project would be required to submit PRDs and a SWPPP to the SWRCB for approval prior to the commencement of construction activities. The SWPPP would describe BMPs to reduce erosion and siltation. Therefore, impacts would be less than significant.

The project site is built-out with school uses, and the proposed project would not involve the alteration of any natural drainage or watercourse. The proposed project would rebuild the school buildings and facilities that currently exist on the project site, and therefore, the amount of stormwater runoff would be similar to existing conditions. The proposed project would not substantially increase the rate or amount of surface runoff in a manner that would cause flooding or substantially increase the amount of stormwater. Stormwater that does not percolate into the ground would be directed to storm drains on the project site and to surrounding storm drains in the public right-of-way. The proposed project would be required to implement BMPs that would control the amount and quality of stormwater exiting the project site. The proposed project would not exceed the capacity of existing stormwater drainage systems and would not create substantial additional sources of polluted runoff. Therefore, impacts would be less than significant.

According to the Federal Emergency Management Agency's (FEMA's) Flood Map Service, the project site is within FEMA Flood Zone X, which is an area of minimal flood hazard (FEMA 2025) and is unlikely that flooding would occur on site. Therefore, impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

- d) Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The project site is not within a flood hazard zone (FEMA 2025). The project site is also not in a dam inundation, tsunami, or seiche zone (Encinitas 1995; DOC 2025d). The nearest reservoir, Stanley A. Mahr Reservoir, is approximately 4.9 miles northeast of the project site (DWR 2025). The Batiquitos Lagoon is approximately 1.9 miles north of the project site, and the Pacific Ocean is approximately 0.24 mile west of the project site. Given the distance, intervening development, and varying topography, the proposed project would not release pollutant due to inundation. No impact would occur.

Significance Before Mitigation: No Impact.

- e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

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Less-than-Significant Impact. The proposed project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Project construction would be subject to the statewide CGP and implementation of BMPs specified in the SWPPP. This would minimize the potential for erosion or siltation impacts to occur that could impact receiving waters. The project site is developed with a school and is not a substantial groundwater recharge area, and implementation of the proposed project would not result in substantial increases in water demands that would require pumping of additional groundwater. Therefore, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

5.1.5 Land Use and Planning

a) Would the project physically divide an established community?

No Impact. The proposed project does not involve the construction of a new transportation corridor nor any other physical barrier that would sever or inhibit physical connectivity within the community. The project site and surrounding area are fully developed with urban land uses. The proposed project would occur within the project site boundaries. No impact would occur.

Significance Before Mitigation: No Impact.

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

No Impact. The proposed project is consistent with the existing use of the project site as a school campus. The proposed project would rebuild the school and would not change the use of the project site. Project development would not require a change to the land use or zoning designations of the project site. Development of the proposed project would not conflict with any applicable land use plans, policies, or regulations. Therefore, there would be no impact.

Significance Before Mitigation: No Impact.

5.1.6 Mineral Resources

a) Would the project 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?

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No Impact. According to the California Geological Survey's Mineral Land Classification maps, the project site is within Mineral Resource Zone 3 (MRZ-3) which is an area containing known or inferred mineral occurrences of undetermined mineral resource significance (DOC 2025e). The proposed project would involve the rebuild of a school, and the project site would continue to operate as a school upon project completion. No mineral resources would be extracted. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

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

No Impact. The project site is within MRZ-3, an area with no known mineral resources. The Resource Management Element does not identify locally important mineral resource recovery sites within the project site (Encinitas 2011). The project site operates as an existing school, and no mineral resources would be extracted. No impact would occur.

Significance Before Mitigation: No Impact.

5.1.7 Population and Housing

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

No Impact. The proposed project would rebuild the campus and would not increase capacity, enrollment, or the number of staff on site. The proposed project would not create new construction employment opportunities that could result in a greater demand for local housing. Additionally, the proposed project would continue to utilize the existing roads and infrastructure. Therefore, the proposed project would not induce population growth in the area, either directly or indirectly. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

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

No Impact. The proposed project would be constructed within the project site boundaries. No housing exists at the school, and no relocation or construction of replacement housing would occur. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

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5.1.8 Public Services

- a) 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:

Fire protection?

Less-than-Significant Impact. Fire protection and emergency medical services in the City of Encinitas are provided by the Encinitas Fire Department. The nearest fire station is Station 3 at 801 Orpheus Avenue in the City of Encinitas, approximately 0.40 mile northeast of the project site. Construction of the proposed project would be required to comply with all applicable regulations regarding building code, hazardous material handling, fire protection, and the California Fire Code (CFC). Construction plans would be reviewed by the Encinitas Fire Department and DSA to ensure adequate emergency access. Additionally, construction activities would be temporary. The proposed project would not increase capacity, enrollment, or the number of staff on site. Therefore, the proposed project would not substantially increase the need for fire protection services, and impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

Police protection?

Less-than-Significant Impact. The City of Encinitas contracts law enforcement services with the San Diego County Sheriff's Department. The North Coastal Sheriff Station at 175 North El Camino Real in the City of Encinitas, which serves the project site, is approximately 2.3 miles east of the project site. The proposed project may cause a slight increase in demands for police services during construction from possible trespass, theft, and/or vandalism. Any increase in police demands would be temporary and would not require the construction of new or expanded police facilities. The demand for law enforcement protection services generally corresponds to population. Since the proposed project would not increase capacity, enrollment, or the number of staff, the proposed project would not increase the need for police protection services. Impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

Schools?

No Impact. The proposed project would rebuild the existing campus. Demand for schools is largely generated by new housing developments. The proposed project would serve existing

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students and would not generate an increase in capacity, enrollment, or the number of staff. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

Parks?

No Impact. Increases in demand for parks are generally created by the development of new housing and/or actions that increase population. The proposed project would serve the existing student population and would not include population growth or housing in the area. The proposed project would not increase the use of existing parks or recreational facilities, or the need for new parks or recreational facilities. The District has a joint-use agreement with the Leucadia Farmers Market to utilize the hardcourt and sports field on Sundays; the Leucadia Farmers Market would temporarily be relocated to Oak Crest Middle School approximately two miles southeast during construction. As the proposed project would not construct housing or increase population, and would include recreational facilities onsite, no impact would occur.

Significance Before Mitigation: No Impact.

Other public facilities?

No Impact. The proposed project would be served by the existing infrastructure on site and surrounding the project site. Due to the size and general nature of the proposed project, impacts to public facilities are not anticipated to be significant. The District would be responsible for required utility connections and any applicable improvements necessary to accommodate the proposed project. Development of the proposed project would not require new or altered governmental services for the maintenance of roadways or other public facilities. The nearest public library is the Encinitas Library at 540 Cornish Drive in the City of Encinitas, approximately 0.8 mile south. The proposed project would not induce population growth nor increase enrollment, capacity, or the number of staff. Therefore, impacts would be less than significant.

Significance Before Mitigation: No Impact.

5.1.9 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?

No Impact. As discussed in Impact 5.1.8, the demand for recreational facilities is created by the development of new housing and/or actions that generate additional population. The proposed

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project would serve an existing student population and would not increase capacity, enrollment, or the number of staff. Therefore, the proposed project would not cause population growth, and there would be no substantial increases in the use of existing parks or recreation facilities. Therefore, no impact would occur.

Significance Before Mitigation: No Impact.

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

No Impact. As discussed in Impact 5.1.9(a), the proposed project would serve the existing student population and would not increase the school's capacity, enrollment, or number of staff. Therefore, the proposed project would not induce growth, and no increases in the use of any existing facilities would occur. The proposed project would not require the construction or expansion of recreational facilities off campus. No impact would occur.

Significance Before Mitigation: No Impact.

5.1.10 Utilities and Service Systems

- a) Would the project 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. The project site is within a fully developed urban area with existing utility infrastructure. The proposed project would require new and/or upgraded connections for on-site water, sewer, storm drain, electrical, gas, and telecommunications lines to serve the new buildings. The new buildings on site would include new utilities and plumbing infrastructure, which would be more water efficient than the infrastructure currently at the project site. Overall, as the proposed project would not result in an increase in capacity, enrollment, or the number of staff, the water, wastewater, storm drain, electricity, gas, and telecommunications demands of the proposed project would be similar to existing conditions. Additionally, to accommodate the temporary relocation of students during construction at the project site, temporary portable classrooms would be installed at Park Dale Lane Elementary School and El Camino Creek Elementary School, which would require minor trenching for utilities. As the proposed project would not increase the population within the utility service providers' service areas (but rather, temporarily relocate students during construction), construction or expansion of facilities is not required. Overall, the proposed project would not require the construction or relocation of new or expanded utility facilities, as the proposed project would not induce population growth, and impacts would be less than significant.

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Significance Before Mitigation: Less-than-Significant Impact.

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

Less-than-Significant Impact. The proposed project would be served by the San Dieguito Water District. As the proposed project would not induce population growth, and because the new buildings on site would include new utilities and plumbing infrastructure that would be more water-efficient than the infrastructure currently at the project site, the proposed project's water demands would be similar to existing conditions. Therefore, the proposed project would not require an increase in water supplies. Moreover, the proposed project would be required to comply with the provisions of CALGreen Division 5.3, Water Efficiency and Conservation, including those of Sections 5.303, Indoor Water Use, and 5.304, Outdoor Water Use. As such, impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

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

Less-than-Significant Impact. The proposed project would not induce population growth; there would be no increases in capacity, enrollment, or the number of staff. As such, the proposed project would not generate more wastewater than what is currently being generated. The new building would include more efficient plumbing infrastructure that could reduce the amount of flow generated by the proposed project. Therefore, the proposed project would not increase wastewater capacity needs, and impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

- d) Would the project 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. During construction, the proposed project would generate demolition and construction debris from the removal of existing structures and site improvements. The proposed project would comply with CALGreen Section 5.408, Construction Waste Reduction, Disposal, and Recycling, which requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. The proposed project would not increase enrollment, capacity, or the number of staff. As such, solid waste generation would be similar to existing conditions. Therefore, the proposed project would not adversely impact landfill capacity or impair attainment of solid waste reduction goals, and impacts would be less than significant.

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Significance Before Mitigation: Less-than-Significant Impact.

- e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less-than-Significant Impact. All local governments, including the City of Encinitas, are required under Assembly Bill 939 (AB 939), the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. The District currently complies with federal, state, and local statutes and regulations related to solid waste, such as the California Integrated Waste Management Act and local 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. CALGreen Section 5.408, Construction Waste Reduction, Disposal, and Recycling, requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. The proposed project would comply with all applicable federal, state, and local statutes and regulations related to solid waste disposal. Therefore, the impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

5.1.11 Wildfire

- a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less-than-Significant Impact. The project site is in an urbanized area surrounded by development and is not within a very high Fire Hazard Severity Zone (FHSZ) (CAL FIRE 2025). The proposed project would occur within the project site boundaries and would not impair emergency evacuation routes. The proposed project would be designed in accordance with the CBC and CFC. Additionally, the proposed project design plans would be reviewed by DSA and the Encinitas Fire Department. Therefore, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

- b) Would the project, 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?

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Less-than-Significant Impact. The project site and surroundings are relatively flat, and the proposed project would not exacerbate fire risks. Additionally, as the project site is in an urbanized area surrounded by development and is not within a very high FHSZ, the proposed project would not expose people to pollutant concentrations or uncontrolled wildfire spread. Therefore, impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

- c) Would the project 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 project site is in an urban area and is served by existing utility infrastructure. Development of the proposed project could require new utility hook-ups to the existing utilities that serve the project area. All utility lines would be installed to meet service provider requirements. The proposed project would be designed and constructed in accordance with the CBC and the CFC. As the project site is not within a very high FHSZ, the proposed project would not exacerbate fire risks. Therefore, the proposed project would not include the installation or maintenance of infrastructure that could exacerbate fire risk or result in temporary or ongoing impacts to the environment. Impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

- d) Would the project 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. As indicated in Impact 5.1.3(a) and Impact 5.1.4(c), the project site is not within a flood or landslide hazard zone. The proposed project would not increase the existing hazards on the project site as the project site currently operates as a school, and the proposed project would rebuild the campus. Additionally, the project site is not within a very high FHSZ. Therefore, the proposed project would not result in downslope or downstream flooding or landslides as a result of post-fire slope instability or drainage changes. Therefore, impacts would be less than significant.

Significance Before Mitigation: Less-than-Significant Impact.

5.2 SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(a) requires that “Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short- and long-term effects.” CEQA Guidelines Section 15126.2(c) requires that an EIR

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describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Table ES-1, *Summary of Significant Environmental Impacts and Mitigation Measures*, in the *Executive Summary* of this DEIR summarizes the significant impacts, mitigation measures, and levels of significance with and without mitigation.

Though mitigation measures, where feasible, would reduce the level of impact of the proposed project, the following impact would remain significant and unavoidable:

- **Impact CUL-1:** Improvements to the Old Schoolhouse would result in the loss of its recommended historic eligibility for listing on the NRHP and CRHR.

5.3 SIGNIFICANT IRREVERSIBLE CHANGES

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss whether “Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.” The discussion shall consider primary and secondary impacts that generally commit future generations to similar uses, irreversible damage from environmental accidents, and irretrievable commitments of resources.

The following are the significant irreversible changes that would be caused by the proposed project if it is implemented:

- The reconstruction of the campus would require the commitment of nonrenewable and/or slowly renewable energy resources, including gasoline, diesel fuel, and electricity; human; and natural resources such as sand and gravel, steel and other metals, and water.
- Operation of the proposed project would require continued use of electricity, petroleum-based fuels, fossil fuels, and water, similar to existing school operations.
- Operation of the proposed project would require a continued commitment of social services and public maintenance services (e.g., police, fire, utility providers).

The scale of the resource commitment for construction and the continued operational demands would limit the availability of these resources for future generations or for other uses during the proposed project's lifespan.

5.4 GROWTH-INDUCING EFFECTS

Section 15126.2(e) of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical factors may include the removal of obstacles to population growth such as through a major expansion of a wastewater plant.

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This section evaluates the proposed project's potential to create such growth inducements. As CEQA Guidelines Section 15126.2(e) states, "It must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment." This issue is presented to provide additional information on ways in which the proposed project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this DEIR.

Growth-inducing impacts fall into two categories: direct or indirect. Direct growth-inducing impacts are generally associated with providing urban services to an undeveloped area. Indirect, or secondary, growth-inducing impacts consist of growth induced in the region by additional demand for housing, goods, and services associated with a population increase caused by or attracted to a new project. This analysis provides an overall discussion of proposed project impacts and considers utility infrastructure and circulation to determine whether the proposed project would result in direct or indirect growth inducement.

The proposed project would rebuild the campus but would not increase enrollment, capacity, or the number of staff. The project site is within an urbanized area served by existing infrastructure, including water and sewer mains, and electricity and natural gas services. The proposed project would only impact the project site and would not remove obstacles to growth or affect population growth. The proposed project would not result in the need for additional public government services or expanded utility infrastructure. Construction of the proposed project would generate short-term employment that would be absorbed from the regional labor force, so it would not attract new workers to the region.

District approval would not set a precedent that could encourage and facilitate local and regional activities and government actions that could significantly affect the environment. School construction activities to enhance educational and athletic programs are common statewide and nationwide.

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