DRAFT

Initial Study/Mitigated Negative Declaration

San Marcos High School Sitewide Athletic Improvements Project

MARCH 2026

Prepared for:

SAN MARCOS UNIFIED SCHOOL DISTRICT
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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
APN	Assessor's Parcel Number
CEQA	California Environmental Quality Act
City	City of San Marcos
dB	decibels
District	San Marcos Unified School District
SMHS	San Marcos High School
I-	Interstate
LED	light-emitting diode
MND	Mitigated Negative Declaration
PA	public address
Project	San Marcos High School Sitewide Athletic Improvements Project
SR-	State Route
VMT	vehicle miles traveled

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1 Introduction

1.1 Project Overview

The San Marcos Unified School District (District) proposes to replace the existing synthetic turf, track, shot put areas, pole vault, and long jump runways at the San Marcos High School (SMHS) football stadium with new, comparable synthetic surfaces (e.g., synthetic turf and rubberized track/surfaces). In addition, the existing natural turf soccer field along the southern boundary of SMHS (north of La Casita Drive and west of the SMHS tennis courts) is proposed to be replaced with a synthetic turf field and shot put area that would also feature permanent, non-directional lighting. The proposed San Marcos High School Sitewide Athletic Improvements Project (project) would also include removing the existing shot put areas on the rubberized surface area to the immediate south of the existing track and replacing them with three sand volleyball courts. The proposed project would not result in changes to student, staff, or bleacher capacity and no Public Address (PA) system would be added to the soccer field along the southern boundary of SMHS or at the proposed beach volleyball courts.

1.2 California Environmental Quality Act Compliance

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

1.3 Project Planning Setting

SMHS is part of the District and is at 1615 West San Marcos Boulevard in the City of San Marcos, San Diego County (Assessor's Parcel Number [APN] 221-032-4800). The project would be developed within the existing school campus.

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2 Project Description

2.1 Project Location

SMHS is part of the District and is at 1615 West San Marcos Boulevard in the City of San Marcos, San Diego County (Assessor's Parcel Number [APN] 221-032-4800). The project would be developed within the existing school campus.

The City of San Marcos is in northern San Diego County and is bounded by the City of Escondido to the east, unincorporated San Diego County to the south and north, the City of Encinitas to the southwest, the City of Carlsbad to the west, and the City of Vista to the northwest. Regional access to the City is provided by Interstate 15 (I-15) and State Route 78 (SR-78). I-15 is approximately 5.6 miles to the east of the project site, and SR-78 approximately 1-mile northeast of the project site. See Figure 1, Project Location.

2.2 Environmental Setting

San Marcos High School

SMHS is designated for Public Institutional (PI) use and zoned Public-Institutional (P-I) by the City of San Marcos General Plan Land Use and Zoning Maps, respectively (City of San Marcos 2025). See Figure 2, General Plan Land Use and Zoning.

SMHS serves students in grades 9 through 12 and had a total enrollment of 3,067 students during the 2024-2025 school year (CDE 2025). The SMHS campus is approximately 45 acres, and includes centralized classroom buildings, softball and baseball fields in the northeast and southwest corners of the campus, an artificial turf football and rubberized surface track stadium centrally located on the north side campus, multi-purpose field on the south side of campus, tennis courts, and other hardcourts in the southeastern corner of the campus, and parking lots in the western and northern portions of the campus. Landscaping is provided through the campus but particularly in the parking lots, centralized quad area, and near classroom buildings. See Figure 3, Existing SMHS Campus.

Surrounding Area

The SMHS campus is bordered by San Marcos Boulevard, and further north by commercial uses and a healthcare center/skilled nursing facility, Discovery Street, San Marcos Creek (and associated riparian corridor), the Links at Lakehouse golf course are on the east. On the south, the campus is bordered by La Casita Drive which is lined with single-family residences. Lastly, the western boundary of the campus is bordered by a small automotive repair shop and single-family residences (La Bonita Drive parallels a portion of the campus' western boundary). Nearby properties are designated for Commercial (C), Specific Plan Area (SPA), Open Space (OS), Low-Density Residential (LDR) and Medium-Density Residential (MDR) use; and are zoned Commercial, Senior Residential (SR), and Open Space. The Lake San Marcos Neighborhood that occurs to the east, south, and west of the campus boundary is within the City's Sphere of Influence but is not zoned by the City. See Figures 2 and 3.

2.3 Project Characteristics

The San Marcos Unified School District (District) proposes to replace the existing synthetic turf, track, shot put areas, pole vault and long jump runways at the SMHS football stadium with new, comparable synthetic surfaces (e.g., synthetic turf and rubberized track/surfaces). In addition, the existing natural turf multi-purpose field along the southern boundary of SMHS (north of La Casita Drive and west of the SMHS tennis courts) is proposed to be replaced with a synthetic turf field and shot put area that would also feature permanent, directional lighting. The proposed project would also include removing the existing shot put areas on the rubberized area to the immediate south of the existing track and replacing them with three sand volleyball courts. The proposed project would not result in changes to student, staff, or bleacher capacity and no PA system would be added to the multi-purpose field along the southern boundary of SMHS or at the proposed beach volleyball courts. Figure 4, Conceptual Layout Plan, shows the locations of the proposed athletic field improvements on the SMHS campus.

Stadium Improvements

The existing synthetic turf field and rubberized track would be replaced with new synthetic turf and rubberized surfacing. Existing surfaces (primarily the field) are weathered, aged, and in need of replacement. Similar materials as currently installed would be used, and similar graphics and stencilling would be added to the field. Slight modifications to the existing pole vault layout are proposed; specifically, the pole vault areas (currently there are two distinct pole vault runways, pits, and landing areas on the southern end of the stadium field surface) would be consolidated (runways would be immediately adjacent to one another) but would remain to the south of the southern end zone of the stadium field. The existing aggregate base and drainage would remain in place at the stadium turf.

Multi-Purpose Field Improvements

The District is proposing to add permanent nighttime sports lighting to the multi-purpose field in the southern portion of the SMHS campus, as shown in Figure 4. The proposed lighting improvements are prompted by the passage of Senate Bill (SB) 328, which requires high schools to start no earlier than 8:30 am. Instituting a later start time is expected to reduce the negative impacts of sleep deprivation on adolescents and give them multiple health, safety, and learning benefits. However, with the later start time, schools will also end later, which will affect sports activities. Currently, the multi-purpose field is lit for evening practice use.

The field lighting would consist of four, 70-foot galvanized steel light poles with pre-cast concrete bases. The embedment depth for pre-cast concrete bases is approximately 14 feet below ground surface and operation of field lighting would also require extension of existing electrical utilities via trenching methods (depth of trenching would be between approximately 26 and 36 inches and would achieve a required 24 inches of cover over electrical conduit). There would be a total of 20 LED luminaires (Musco 2025). The proposed lighting would provide an average of 41 footcandles (fc), with a minimum light level of 35 fc and a maximum light level of 50 fc. The lighting has been designed to meet recognized lighting standards to ensure safe visibility for athletes and coaches and minimal glare and light spill. Appendix A, Lighting Plan, provides details on the proposed practice field lighting. Figures 5 and 6 depict calculated horizontal and vertical spill light levels at nearby residential properties along La Casita Drive.

The intent of the field lighting is to extend the hours available for team practices at SMHS. The school currently operates six solar power light towers (field lights) in place and as such, nighttime use of the field for practices does

occur. The lights and panels are installed on a small towable trailer, and the lights are mounted at approximately atop a telescopic tower at approximately 20 feet above adjacent ground level. The existing field does not have bleachers or seating to accommodate spectators, nor would bleachers/benches be added. Once field lights are installed, the multipurpose field would be used for practice only. SMHS would be able to hold practice at the multipurpose field instead of using other on-site locations, such as the football or baseball fields.

Additionally, the existing natural turf at the practice field (and immediate surrounding areas) would be replaced with new synthetic turf. The area of natural to artificial turf replacement measures approximately 270 feet by 380 feet. The existing discuss throwing area in the southeastern corner of the practice field area would remain as-is (concrete surface) but the existing turf area to the immediate north would be replaced with synthetic turf and hardscape (concrete) areas to accommodate a proposed (new) shot put venue. The existing shot put venue (and high jump area) is located on the rubberized surface area to the south of the existing track and is being moved to accommodate the proposed beach volleyball court. The new shot put "venue" would include two throwing circles and stop boards and a shared landing area that would be partially fenced from the adjacent synthetic turf practice field. See Figure 4. The new synthetic field would have a below grade drainage system to collect water and connect to the existing storm drain system on site.

Activities and Events

The following includes potential activities and events that would occur on the practice field after hours. No interscholastic events or competition would occur on the practice field.

- August through October: Fall sports and marching band. Use of field no later than 10 p.m.
- November: Fall and winter sports and marching band. Use of field no later than 10 p.m.
- December – January: Winter and spring sports. Use of field no later than 10 p.m.
- March – June: Spring sports. Lights on the field would be needed when the stadium is being used for games or events; use of field no later than 10 p.m.

Beach Volleyball Courts

The existing rubberized surface area to the south of the stadium track, currently featuring shot put and high jump facilities, would be removed and replaced with three sand volleyball courts. The southeast portion will be removed and replaced with asphalt. The proposed volleyball games are anticipated to have 2-8 spectators; however, no permanent or temporary bleachers or other seating options are proposed at this time.

As previously discussed, shot put facilities are proposed to be moved to the multi-purpose field area along the campus' southern boundary and the high jump venue is proposed to be moved to the rubberized surface area between the southern end zone of the stadium field and track.

2.4 Project Construction and Phasing

The project construction is anticipated to start in May 2026 and finish by late July 2026. Table 2-1 identifies the assumed construction phase start and end date and identifies type of equipment anticipated to be used during construction.

Table 2-1. Construction Scenario Assumptions

Construction Phase	Construction Dates		Average Daily One-Way Vehicle Trips			Equipment		
	Start	End	Workers[1]	Vendor Trucks[2]	Haul Trucks[3]	Equipment Type	Quantity	Daily Usage Hours
Demolition	5/12/2026	5/26/2026	30	14	18	Concrete/Industrial Saws	2	8
						Excavators	1	8
						Rubber Tired Loaders	2	8
						Off-Highway Trucks	2	8
Grading	5/27/2026	6/16/2026	30	14	24	Crawler Tractors	1	8
						Tractors/Loaders/Backhoes	1	8
On-Site Utilities	6/17/2026	6/30/2026	30	14	0	Cranes	1	8
						Tractors/Loaders/Backhoes	1	8
						Skid Steer Loaders	1	8
						Excavators	2	8
Paving	6/24/2026	6/30/2026	30	14	0	Pavers	1	8
						Paving Equipment	1	8
						Rollers	1	8
						Graders	1	8
Architectural Coating	6/24/2026	7/9/2026	30	14	0	Skid Steer Loaders	1	8
						Tractors/Loaders/Backhoes	1	8

Source: San Marcos Highs School Personal Communications, Data Request to Dudek, December 15, 2025. See Appendix B for details.

1 Based on average of 15 workers per day and two trips per day from data request received December 15, 2025.

2 Based on average of seven vendor trucks per day and two trips per day from data request received December 15, 2025.

3 CalEEMod defaults based on 750 tons of debris hauled away and 2,700 cubic yards of soil/turf hauled away.

2.5 Existing Zoning and General Plan

The high school is designated for Public Institutional (PI) use and is zoned Public-Institutional (P-I).

2.6 District Action Requested

The following actions are requested for the project:

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

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3 Initial Study Checklist

1. **Project title:**

   San Marcos High School Sitewide Athletic Improvements Project

2. **Lead agency name and address:**

   San Marcos Unified School District
   255 Pico Avenue, Suite 100
   San Marcos, California 92069

3. **Contact person and phone number:**

   Tova Corman, Executive Director, Facilities Planning and Development
   760.752.1227

4. **Project location:**

   1615 West San Marcos Boulevard, San Marcos, California

5. **Project sponsor's name and address:**

   San Marcos Unified School District
   255 Pico Avenue, Suite 100
   San Marcos, California 92069

6. **General plan designation:**

   Public Institutional (PI)

7. **Zoning:**

   Public Institutional (PI)

8. **Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

   The proposed project would replace the existing synthetic turf, track, shot put areas, pole vault and long jump runways at the SMHS football stadium with new, comparable synthetic surfaces (e.g., synthetic turf and rubberized track/surfaces). In addition, the existing natural turf soccer field along the southern boundary of the SMHS campus is proposed to be replaced with a synthetic turf field and shot put area that would also feature permanent, non-directional lighting. The proposed project would also include removing the existing shot put areas on the rubberized surface area to the immediate south of the existing track and replacing them with three sand volleyball courts.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:

The SMHS campus is bordered by San Marcos Boulevard, and further north by commercial uses and a healthcare center/skilled nursing facility, Discovery Street, San Marcos Creek (and associated riparian corridor), the Links at Lakehouse golf course and residential uses are on the east. On the south, the campus is bordered by La Casita Drive which is lined with single-family residences. Lastly, the western boundary of the campus is bordered by a small automotive repair shop and single-family residences (La Bonita Drive parallels a portion of the campus' western boundary).

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Division of State Architect

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

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code Section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.

The District notified the Rincon Band of Luiseno Indians about the proposed project on February 6, 2026. See Section 3.18, Tribal Cultural Resources.

Environmental Factors Potentially Affected

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

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

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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



Signature _____ Date _____

Print _____ Title _____

Evaluation of Environmental Impacts

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

3.1 Aesthetics

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

a) Would the project have a substantial adverse effect on a scenic vista?

Less than Significant Impact. According to the City of San Marcos General Plan Conservation and Open Space Element, local scenic vistas include views of prominent topography including Mount Whitney, Double Peak, Owens Peak, San Marcos Mountains, Merriam Mountains, Cerro de Las Posas, Franks Peak, San Elijo Hills, and canyons (City of San Marcos 2012). In addition, the Conservation and Open Space Element notes the availability of scenic views to prominent terrain from Twin Oaks Valley Road and State Route 78, and also identifies creek corridors, eucalyptus stands, rock outcroppings, historic buildings, and ocean views as local (i.e., City of San Marcos) scenic resources (City of San Marcos 2012).

At its nearest point, State Route 78 and Twin Oaks Valley Road is located approximately 1 mile to the northeast and 2.1 miles to the east, respectively, of the SMHS campus.

Due to distance and intervening development, the SMHS campus is not clearly visible from State Route 78. Similarly, during daytime hours, project components on the SMHS campus would not be clearly visible or distinct as viewed from State Route 78. Due to distance and their relatively thin profile, vertical components including field light poles would not block or substantially interrupt existing views of local terrain (or views of creek corridors, eucalyptus stands, or any other scenic resources identified in the City of San Marcos General Plan Conservation and Open Space Element). Night lighting from the operation of new practice

field lights may be visible from the state route; however, these light sources would be located over 1 mile away and would operate and be viewed within an existing urbanized setting supporting night lighting. As nighttime lighting would not result in a substantial adverse effect on a scenic vista from State Route 78, and the presence of field lights and other project components would not result in substantial blockage or interruption of views, scenic vista impacts would be less than significant.

Due to intervening topography, development, and distance, neither the SMHS campus nor project components proposed on the SMHS campus would be visible from Twin Oaks Valley Road. Thus, no impact to scenic vistas/views available from Twin Oaks Valley Road would occur as a result of project construction or operation.

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

No Impact. The nearest officially designated and eligible state scenic highways (State Route 52 through Mission Trails Regional Park and State Route 76) are located 20 miles and 9.24 miles, respectively, from the SMHS campus (Caltrans 2026). While State Route 78 is a City-designated view corridor and eligible state scenic highway, the nearest eligible state scenic segment of the state route is located near the community of Julian, approximately 35 miles east of the SMHS campus. Due to distance, and intervening topography and development, the project would not be visible from a State scenic highway. Development of the project as proposed would also not damage or remove existing trees, rock outcroppings, historic buildings, or any locally designated scenic resources identified as such in the City's General Plan. Thus, no impact to scenic resources within a state scenic highway would occur.

c) In non-urbanized 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. SMHS is a developed campus located an urbanized area of San Marcos that primarily supports residential and commercial uses. See Figure 1. Project components would be locally entirely within the boundaries of the SMHS campus that is zoned for Public-Institutional use (and operation of project components would not conflict with the underlying zoning applied to the campus). Furthermore and as assessed in Section 3.1(a) above, the proposed light poles at the southerly practice field and improvements to existing sports facilities (including replacement of existing surfaces and/or installation of new surfaces) would not adversely affect views to known scenic resources as other vertical elements including field and street lights, fencing and taller poles for protective netting, and tall support poles for electrical transmission lines currently exist on the SMHS campus or in the nearby vicinity. To approximate changes to existing views associated with proposed installation of new field lighting, a daytime visual simulation was prepared from La Casita Drive. The existing photograph and visual simulation of the proposed field lights from La Casita Drive are presented on Figure 7, Visual Simulation: Practice Field Lighting from La Casita Drive (Looking East). As shown in the figure, new field lights would be visible and noticeably taller than existing support poles for protective netting; however, new poles would not block existing views of a scenic resource and would not substantially interrupt an existing view of a recognized local scenic resource. Light poles would be visible from additional public vantage points including from La Bonita Court (an existing photograph from eastbound La Bonita Court is presented on Figure 8, Existing

Conditions: La Bonita Court [Looking East]); however, light poles and visible field improvements (e.g., proposed synthetic turf field, portable netting, chain-link fencing, and shot put area) would be viewed alongside softball field fencing, street lights and supporting poles. Furthermore, field lights would be viewed against distant trees (reducing overall visibility and prominence) and would occur where practice fields, protective netting, and chain-link fencing currently operate and exist. From La Bonita Court and La Tierra Lane, proposed light poles on the practice field would be viewed against mature trees associated with the San Marcos Creek corridor; however, due to their thin profile and overall limited number of poles, and due to the density of visible trees in available views, the introduction of light poles would not result in the substantial degradation of views to local scenic resources such as the creek corridor or more distance mountain terrain.

The SMHS campus is in an established urbanized area; the proposed project would not degrade views of any designated scenic resource; the project is consistent with the underlying Public-Institutional (P-I) zoning applied to the SMHS campus; and the project would not violate any regulations governing scenic quality. Thus, impacts would be less than significant.

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

Less than Significant Impact. The project includes the installation of new permanent field lights (4) to the existing on-campus practice field located along the southern SMHS campus boundary, north of La Casita Drive. Six solar light towers (mobile field lights comprised of four adjustable LED light fixtures each) are currently in operation at the practice field to support evening and nighttime practices. Additionally, the SMHS campus features multiple sources of nighttime lighting including overhead lighting in parking lots, overhead lighting throughout the school central quad area, building lighting (exterior and interior) and tall field lighting at the football stadium. Off-campus, existing sources of nighttime lighting include streetlights, building lights (interior and exterior), vehicle headlights, traffic signals, and illuminated signage and parking lot lighting in commercial areas.

Section 20.300.080, Light and Glare Standards, of the San Marcos Municipal Code, is intended for safety purposes and establishes that proper illumination shall be provided at entryways, along walkways, between buildings, and within parking areas. This section of the Municipal Code establishes general standards for nonresidential development, such as the use of shielded fixtures with well-defined cut offs directing light downward toward ground surfaces, prohibition of flood lighting, and property perimeter lighting not affiliated with parking lot lighting exceeding 0.5 fc at any point along the property line of the subject or adjacent parcel.

Basic design elements for light control and reduced spill lighting include mounting height and pole placement, use of tight aiming angle (and cutoff angles), asymmetric beam distribution, use of full cutoff and shielded optics, precision reflectors and refractors, and LED source control including directional LED arrays. When combined, a well-designed field lighting system can create a bright, even playing surface while minimizing light trespass onto off-site areas. The proposed lighting poles incorporate basic design elements for light control and spill lighting, and as proposed, each included element can be arranged individually to control and minimize any potential spill lighting impacts. Each light assembly would be adjusted, and

additional shields would be installed as necessary to ensure that light levels at the sensitive receptors do not exceed the light threshold and to reduce sky glow impacts.

The location of proposed field lights on the existing southern practice field on the SMHS campus is shown on Figure 4. As shown on the figure, two poles would be located within approximately 30 feet of existing fencing installed along the southern boundary of the campus. Figure 5 and Figure 6 depicted the calculated lighting levels at the nearest residential property lines to the south of the campus along La Casita Drive, and the illustration summary box provided on the figures highlights the scan average, and maximum and minimum footcandle levels. Figure 5 depicts calculated light levels at the nearest residential property lines ranging from a maximum of 0.55 horizontal footcandles to a minimum of 0.00 horizontal footcandles. Regarding maximum vertical spill light levels, the average light levels along property lines to the south of the SMHS campus would be 0.168 footcandles with two isolated anticipated maximum levels of greater than 0.70 foot candles at two locations. Due to the anticipated low average off-site light levels and with implementation of aiming angles (and cutoff angles), asymmetric beam distribution, use of full cutoff and shielded optics, precision reflectors and refractors, and LED source control including directional LED arrays, potential spill light impacts to the adjacent sensitive receptors (i.e., local residents) would be less than significant.

As proposed, the LED luminaires associated with practice field lighting would be shielded and directed downward (and away from the nearest residences and public rights-of-way) so that glare impacts are minimized. Further and as detailed in Figures 5 and 6, the proposed mounting heights of luminaries (70 feet above field level), lack of high tilt angles, precise aiming of beams, multi LED arrays in luminaires, and shielding (specific, use of aluminum side visors) would reduce glare potential during operations. In addition, and as described in Section 2.3, use of the practice field (and field lighting) would end no later than 10:00 p.m. during seasons of use. As such, potential glare impacts associated with the project would be less than significant.

3.2 Agriculture and Forestry Resources

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

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. The Project site is mapped as "Urban and Built Up Land" and is surrounded by lands classified by the California Important Farmland Finder as Urban and Built Up Land (DOC 2026a). The project would occur on the existing developed campus of SMHS and would not convert farmland to non-farmland uses. Therefore, no impact would occur.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. There are no Williamson Act contracts on the SMHS boundary (or in the immediate surrounding area) (DOC 2026b) and the high school campus is zoned for Public-Institutional (P-I) use and would continue to operate as a grade 9-12 high school following project implementation. As the site is not zoned for agricultural use, is surrounded by urbanized uses, and does not support on-site Williamson Act contracts, no impacts would occur.

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 would occur on the existing developed campus of SMHS that is zoned for Public-Institutional (P-I) use. As the implementation of identified improvements in the Project would not conflict with existing zoning for forestland or timberland (no such lands existing on site or in the immediate surrounding area), no impacts would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project would occur on the existing developed campus of SMHS that is within an urbanized area. No forest land occurs on site or in the surrounding area and as such, implementation of the project as proposed would not result in the loss of forest land or conversion of forest land to non-forest use. No impacts would occur.

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 non-agricultural use or conversion of forest land to non-forest use?

No Impact. The project would occur on the existing developed campus of SMHS that is within an urbanized area. No forest land occurs on site or in the surrounding area and as such, implementation of the project as proposed would not result in the loss of forest land or conversion of forest land to non-forest use. No impacts would occur.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) indicates that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to determine whether a project would have a significant impact on air quality.

As part of its air quality permitting process, the San Diego Air Pollution Control District (SDAPCD) has established thresholds in Rule 20.2 requiring the preparation of Air Quality Impact Assessments for permitted stationary sources. SDAPCD sets forth quantitative emission thresholds below which a stationary source would not have a significant impact on ambient air quality. Project-related air quality impacts estimated in this environmental analysis would be considered significant if any of the applicable significance thresholds presented in Table 3.3-1 are exceeded.

For CEQA purposes, these screening criteria can be used as numeric methods to demonstrate that the project's total emissions would or would not result in a significant impact to air quality.

Table 3.3-1. SDAPCD Air Quality Significance Thresholds

Construction Emissions			
Pollutant	**Total Emissions (Pounds per Day)**		
Coarse particulate matter (PM_{10})	100		
Fine particulate matter ($PM_{2.5}$)	55		
Oxides of nitrogen (NO_x)	250		
Sulfur oxides (SO_x)	250		
Carbon monoxide (CO)	550		
Volatile organic compounds (VOCs)	75[a]		
Operational Emissions			
	Total Emissions		
Pollutant	**Pounds per Hour**	**Pounds per Day**	**Tons per Year**
Coarse particulate matter (PM_{10})	N/A	100	15
Fine particulate matter ($PM_{2.5}$)	N/A	55	10
Oxides of nitrogen (NO_x)	25	250	40
Sulfur oxides (SO_x)	25	250	40
Carbon monoxide (CO)	100	550	100
Lead and lead compounds	—	3.2	0.6
Volatile organic compounds (VOCs)	—	75*	13.7

Source: County of San Diego 2007.
Notes: SDAPCD = San Diego Air Pollution Control District. N/A = not applicable
[a] VOC threshold based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley as stated in the San Diego County Guidelines for Determining Significance.

The thresholds listed in Table 3.3-1 represent screening-level thresholds that can be used to evaluate whether project-related emissions would cause a significant impact on air quality. Emissions below the screening-level thresholds would not cause a significant impact. If emissions exceed these thresholds, modeling would be required to demonstrate that the project's total air quality impacts result in ground-level concentrations that are below the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS), including appropriate background levels. For nonattainment pollutants, if emissions exceed the thresholds shown in Table 3.3-1, the project could have the potential to result in a cumulatively considerable net increase in these pollutants and thus could have a significant impact on the ambient air quality.

SDAPCD Rule 51 (Public Nuisance) prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person (SDAPCD 1976). A project that proposes a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors.

The analysis in this section is based on the assumptions and methodology included as Appendix B to this Initial Study.

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

Less than Significant Impact. The project is within the jurisdiction of the SDAPCD, which develops and implements the clean air plans required to attain state and federal ozone standards, including the State Implementation Plan (SIP) and the Regional Air Quality Strategy (RAQS). San Diego County is a nonattainment area (does not meet standards) for the federal ozone (O_3) standard and attainment or unclassified for all other federal air quality standards. San Diego County is a nonattainment area for CAAQS for O_3, coarse particulate matter (PM_{10}) and fine particulate matter ($PM_{2.5}$) (SDAPCD 2026).

The RAQS, most recently updated in 2022, outlines SDAPCD's plans and control measures designed to attain the state air quality standards for O_3 (SDAPCD 2022a). The SIP and RAQS rely on information from the California Air Resources Board (CARB) and San Diego Association of Governments (SANDAG), including mobile and area source emissions as well as information regarding projected growth in the County as a whole and the cities in the County, to project future emissions and determine the strategies necessary for the reduction of emissions through regulatory controls. 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.

While the SDAPCD and City do not provide guidance regarding the analysis of impacts associated with air quality plan conformance, the County's Guidelines for Determining Significance and Report and Format and Content Requirements – Air Quality does discuss conformance with the RAQS (County of San Diego 2007). The guidance indicates that, if the project, in conjunction with other projects, contributes to growth projections that would not exceed SANDAG's growth projections for the City, the project would not be in conflict with the RAQS (County of San Diego 2007). If a project includes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might conflict with the SIP and RAQS and may contribute to a potentially significant cumulative impact on air quality.

The proposed project would not conflict with the RAQS. The RAQS relies on long range regional growth forecasts prepared by SANDAG to project future emissions and ensure that clean air planning strategies account for expected population, housing, employment, and land use patterns. Because the project would not add new buildings, expand student or staff capacity, it would not generate growth beyond what is already assumed in the City of San Marcos General Plan. As such, the project would not affect regional population, housing, or employment projections, which form the basis of the RAQS.

In addition, the project is consistent with the City's existing General Plan land use designation, indicating it represents anticipated, planned development rather than growth inducing activity. Under SDAPCD guidance, projects whose stationary source emissions fall below the County's screening-level thresholds are not considered to violate an air quality standard or contribute to a regional air quality violation. Because the proposed improvements would generate emissions below SDAPCD screening thresholds (see question 3.3[b]) and would not introduce new or intensified land uses that contribute to unplanned growth, the project would not conflict with the SIP or RAQS, nor would it impede the region's ability to attain state or federal O_3 standards; the impact is 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?

Less than Significant Impact. Past, present, and future development projects may contribute to the San Diego Air Basin (SDAB) adverse air quality impacts on a cumulative basis. By its nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and SDAPCD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulatively considerable contribution on air quality. If a project's emissions would exceed the applied significance thresholds, it would have a cumulatively considerable contribution. Conversely, projects that do not exceed project-specific thresholds are generally not considered to be cumulatively significant.

Construction

Construction of the project would result in emissions of criteria air pollutants, which may result in a cumulatively considerable net increase in emissions of criteria air pollutants for which the SDAB is designated as nonattainment under the NAAQS or the CAAQS. As discussed in question 3.3(a) above, the SDAB has been designated as a federal nonattainment area for O_3 and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The following discussion quantitatively evaluates potential short-term construction and long-term operational impacts that would result from implementation of the project.

Proposed construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and volatile organic compound (VOC) off-gassing from architectural coatings and asphalt pavement application) and off-site sources (i.e., on-road haul trucks, delivery trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions. Therefore, such emissions levels can only be estimated, with a corresponding uncertainty in precise ambient air quality impacts.

Criteria air pollutant emissions associated with construction activity were quantified using the California Emissions Estimator Model (CalEEMod). Construction emissions were calculated for the estimated worst-case day over the construction period associated with each phase and reported as the maximum daily emissions. Construction schedule assumptions, including phase type, duration, and sequencing, were based on information provided by the applicant or CalEEMod defaults and are intended to represent a reasonable scenario based on the best information available. Oxides of nitrogen (NO_x) and carbon monoxide (CO) emissions would primarily result from the use of construction equipment and motor vehicles.

Fugitive dust (PM_{10} and $PM_{2.5}$) emissions would primarily result from grading and site preparation activities. The project would be required to comply with SDAPCD Rule 55, Fugitive Dust Control. This rule requires that the project take steps to restrict visible emissions of fugitive dust beyond the property line. Compliance with Rule 55 would limit fugitive dust generated during grading and construction activities. To account for dust control measures in the calculations, it was assumed that the project would ensure that active sites be watered at least two times daily. The application of architectural coatings, such as exterior application/interior paint and other finishes would produce VOC emissions. The contractor would be

required to comply with the requirements of SDAPCD's Rule 67.7, Cutback and Emulsified Asphalt, which would limit VOC emissions from asphalt off-gassing.

Table 3.3-2 presents the project's maximum daily construction emissions. As shown, these maximum daily emissions would not exceed the applicable significance thresholds for VOC, NO_x, CO, sulfur oxide (SO_x), PM_{10}, or $PM_{2.5}$ during construction. Because the maximum daily emissions are below their respective thresholds, the project would not exceed the annual significance thresholds during construction. Therefore, short-term construction air quality impacts would be less than significant.

Table 3.3-2. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions – Unmitigated

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds Per Day for Daily					
2026 Daily (Summer)	10.08	17.82	25.05	0.07	2.17	0.83
Daily Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Daily Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns.
See Appendix B for complete results.

Operation

Operational emissions represent a project's long-term air quality impacts and typically represent most of a project's air quality impacts. Operational emissions include mobile sources, and area sources (consumer products, architectural coatings, landscape equipment). As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for GHG emissions in CalEEMod, since criteria pollutant emissions would occur at the site of power plants, which are not on the project site while natural gas combustion does occur at the site.

The proposed project would not involve an increase in students or capacity- increasing activities that would generate additional motor vehicle trips. The project also does not include any stationary sources. Some landscaping equipment may be used for maintenance of the site and CalEEMod defaults have been included in the estimates. Table 3.3-3 provides a summary of the project's operational emissions for the first full year of operation, which would be 2027. As shown, these maximum daily emissions would not exceed the applicable significance thresholds for VOC, NO_x, CO, sulfur oxide (SO_x), PM_{10}, or $PM_{2.5}$ during operation. Because the maximum daily emissions are below their respective thresholds, the project would not exceed the annual significance thresholds during operation. Therefore, long-term air quality impacts would be less than significant.

Table 3.3-3. Estimated Maximum Operational Criteria Air Pollutant Emissions – Unmitigated

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds Per Day for Daily					
2027 Daily (Summer)	2.35	0.12	14.02	<0.01	0.02	0.02
2027 Daily (Winter)	0.05	0.00	0.00	0.00	0.00	0.00
Daily Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter.
<0.01 = reported value is less than 0.01
See Appendix B for complete details.

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

Less than Significant Impact. This response focuses on localized air quality impacts to sensitive receptors. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. Facilities and structures where these air-pollution-sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses where air-pollution-sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses) (CARB 2005). There are existing sensitive receptors nearby (existing residences) and the students themselves would also represent on-site sensitive receptors. The nearest off-site residences are located within 115 feet of the soccer field that will have its natural turf replaced with synthetic turf and within 650 feet east of the football stadium.

Carbon Monoxide Hotspots

Construction

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed "CO hotspots." The transport of CO is extremely limited, as it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. The potential for the project to result in localized CO impacts at intersections resulting from addition of its traffic volumes is assessed based on SDAPCD's suggested criteria, which recommends performing a localized CO impact analysis for intersections operating at or below level of service E (County of San Diego 2007) with peak-hour trips exceeding 3,000 trips. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots. CO concentrations at congested intersections would not exceed the 1 hour or 8-hour CO CAAQS unless projected daily traffic would be at least over

100,000 vehicles per day. The project's estimated vehicle trips are anticipated to be a maximum of 68 one-way trips during the grading phase of construction, which represents only 2% of the maximum peak-hour trips if all construction vehicle trips occurred during the same peak hour and is substantially below the 100,000 vehicles per day that could result in a CO hotspot. Furthermore, ambient CO levels in the SDAB have averaged 4.34 parts per million (ppm) for 1-hour CO concentrations between 2004-2024 (the State standard is 20 ppm) and 2.74 ppm for 8-hour CO concentrations (the state standard is 9 ppm) (SDAPCD 2025). Based on the minimal amount of construction traffic and the low ambient CO levels in the SDAB, potential CO impacts are less than significant.

Operation

The project would not result in increased motor vehicle trips. Further, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SDAB is steadily decreasing. Based on these considerations, the proposed project would result in no impact to air quality regarding potential CO hotspots during operation.

Toxic Air Contaminants

Construction

The project would result in a short-term increase in toxic air contaminants (TAC) emissions related to construction, specifically diesel particulate matter (DPM). The SDAPCD guidance on health risk assessment (HRA) does not specifically address short-term impacts from construction; however, the California Office of Environmental Health Hazard Assessment (OEHHA) does recommend assessing short-term risk when construction exceeds two months. Additionally, there are existing sensitive receptors nearby (existing residences) and the students themselves would also represent on-site sensitive receptors. The nearest off-site residences are located within 115 feet of the soccer field that will have its natural turf replaced with synthetic turf and within 650 feet east of the football stadium. Accordingly, a construction HRA was prepared to evaluate potential impacts on sensitive receptors proximate to the project site and on-site students. The HRA is based on the methodologies prescribed in the OEHHA document, Air Toxics Hot Spots Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidelines) (OEHHA 2015). To implement the OEHHA Guidelines based on project information, the SDAPCD has developed a three-tiered approach where each successive tier is progressively more refined, with fewer conservative assumptions. The SDAPCD document, Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments (SDAPCD 2022b), provides guidance with which to perform HRAs within the SDAB.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SDAPCD recommends a carcinogenic (cancer) risk threshold of 10 in one million. Additionally, some TACs increase non-cancer health risk due to long-term (chronic) exposures. The Chronic Hazard Index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. The SDAPCD recommends a Chronic Hazard Index significance threshold of one (project increment).

The exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure level has been established for

DPM; therefore, acute impacts of DPM are not addressed in this assessment. The HRA for the project evaluated the risk to existing off-site residents and on-site receptors from diesel emissions from exhaust from on-site construction equipment and diesel haul and vendor trucks.

Table 3.3-4 summarizes the results of the HRA for proposed project construction, and detailed results are provided in Appendix B.

Table 3.3-4. Construction Activity Health Risk Assessment Results Unmitigated

Impact Parameter	UTME (m)	UTMN (m)	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk - Residential	480811.74	3665449.8	Per Million	0.22	10.0	Less than Significant
HIC - Residential	480811.74	3665449.8	Not Applicable	0.001	1.0	Less than Significant
Maximum Individual Cancer Risk - Student	480906.86	3665644.95	Per Million	0.08	10.0	Less than Significant
HIC - Student	480906.86	3665644.95	Not Applicable	0.004	1.0	Less than Significant

Source: Appendix B.
Notes: UTME = Universal Transverse Mercator East; m = meters; UTMN = Universal Transverse Mercator North; CEQA = California Environmental Quality Act; HIC = Chronic Hazard Index.

As shown in Table 3.3-4, unmitigated project construction activities would generate a maximum individual cancer risk of 0.22 in one million for the most exposed off-site resident and 0.08 in one million for on-site receptors. Both values are well below the significance threshold of 10 in one million. The Chronic Hazard Index from unmitigated construction emissions would be 0.001 for the maximally exposed off-site resident and 0.004 for the maximally exposed on-site receptors, which are both below the significance threshold of 1.0. Therefore, health risk impacts from project construction would be less than significant.

Operation

No TAC emissions and corresponding health risk are anticipated after construction. The project would not include heavy industrial uses, or other land uses typically associated with stationary sources of TAC emissions. Additionally, the project would not be located next to a major stationary TAC source or high-volume roadway. As such, the project would neither result in substantial TAC emissions that may affect nearby receptors nor be exposed to nearby sources of TAC emissions, and the project would have no impact.

Valley Fever Exposure

Construction

Coccidioidomycosis, more commonly known as “valley fever,” is an infection caused by inhalation of the spores of the *Coccidioides immitis* fungus, which grows in the soils of the southwestern United States.

When fungal spores are present, any activity that disturbs the soil, such as digging, grading, or other earth-moving operations, can cause the spores to become airborne and thereby increase the risk of exposure. The ecologic factors that appear to be most conducive to survival and replication of the spores are high summer temperatures, mild winters, sparse rainfall, and alkaline sandy soils.

From 2019-2023, San Diego County experienced an incidence rate of coccidioidomycosis of 13.6 per 100,000 people (County of San Diego 2024), well below the statewide average of 20.8 per 100,000 people during the same period (CDPH 2025). Additionally, within San Diego the incidence rate of coccidioidomycosis is not equally distributed among zip codes. The project site is not within a zip code that experiences a high incidence of coccidioidomycosis (County of San Diego 2024). Valley fever is not highly endemic to the County, and within the County, the incidence rate in the project site is below the County average and the statewide average. Further, construction of the project would comply with SDAPCD Rule 55, which limits the amount of fugitive dust and any potential airborne fungal spores generated during construction. Strategies the project would implement to comply with SDAPCD Rule 55 and control dust include watering two times per day and limiting speed on unpaved roads to 15 miles per hour. Based on the preceding, it is not anticipated that earth-moving activities during project construction would result in exposure of nearby sensitive receptors to valley fever. Therefore, the project would have a less than significant impact with respect to valley fever exposure for sensitive receptors.

Operation

As discussed above, valley fever is not highly endemic to the County. The primary source of valley fever is from the spores that would become airborne in fugitive dust. Once construction is complete, the project would not result in new sources of fugitive dust and, therefore, there would be no impact regarding valley fever.

Health Impacts of Criteria Air Pollutants

The project's construction and operational emissions would not exceed SDAPCD thresholds for any criteria air pollutant, and all resulting air quality impacts would be less than significant. VOC and NO_x emissions, both precursors to O_3 would be minimal and would not meaningfully contribute to regional O_3 formation, particularly given the seasonal and photochemical complexity of ozone generation. Emissions of particulate matter (PM_{10} and $PM_{2.5}$) would also remain below applicable thresholds and would not contribute to exceedances of state or federal standards or hinder the region's attainment efforts. Similarly, NO_2 and NO_x emissions would be minimal and well below levels associated with exceedances of air quality standards or related health effects. CO concentrations would not create localized hotspots or result in significant impacts. Overall, unmitigated construction and operational emissions would not cause or contribute to violations of the NAAQS or CAAQS, would not obstruct regional attainment goals, and would not generate significant health effects.

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

Less than Significant Impact. Based on available information, the project is not anticipated to result in other emissions that have not been addressed under Sections 3.3(b) and 3.3(c) above. As such, this impact analysis is focused on the potential for an odor impact to occur. The occurrence and severity of potential

odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be considered less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project does not propose and would not engage in any of these activities or other potential activities that would generate operational odors. Therefore, impacts related to odors are determined to be less than significant.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

Lighting

Existing habitat to the east of the project site associated with San Marcos Creek is currently exposed to lighting from sporting events at the SMHS campus, cars on La Casita Drive and Discovery Street, street lighting, and lights from the residential uses in the immediate area. Note that the creek is buffered from the campus practice fields and proposed field lights by existing on-campus tennis courts. The proposed project would install new field lighting at existing practice fields to allow for high school athletics practices after dark until 10:00 p.m., as further discussed below and in Section 3.1, Aesthetics. Artificial lighting at night has been documented to affect the behavior or physiology of many wildlife species (Longcore and Rich 2004; Gaston et al. 2013), which can translate to reduced survival and reproduction (Dominoni et al. 2020). Artificial lighting can impact wildlife by interfering with circadian rhythms, disrupting foraging activity and movement patterns, interfering with bird navigation, or singing, and altering the development of eggs, larvae, or juveniles. Current research suggests the effects of LEDs (light-emitting diode) on terrestrial wildlife arise from the intensity and spectrum of the light, not the LED itself (Longcore 2023). Wildlife vision (photopic and scotopic) and sensitivity to light spectrum varies by taxa among vertebrates so no one threshold can be set when calculating lighting impacts for a whole biological community (Longcore 2023). In addition, multiple units of measurement for light are encountered across the sciences, and many have little biological relevance (Hölker et al. 2021). There are no known peer reviewed studies that provide specific qualitative thresholds for light impacts to species that may be present in the area. Therefore, this impact analysis provides a qualitative analysis of the indirect effects of night lighting on wildlife.

In general, most groups of wildlife are sensitive to shorter wavelengths than longer wavelengths and warmer color temperatures of 3,000 kelvins (K)[1] are recommended when possible (Longcore 2023; Alaasam et al. 2018). The proposed project is currently proposing LEDs of 5,700 K, which is similar to bright

[1] Kelvin is used in lighting to measure the color temperature of a light bulb. The higher the Kelvin rating (expressed in K), the whiter the light will be. The lower the K rating, the warmer in color the light will be.

daylight/direct sun conditions than warm light temperatures. However, the proposed lights will be on for only a few hours beyond sunset when the practice fields are in use until 10:00 p.m.

In general, research supports the following steps in project design and planning to alleviate any potential adverse effects of lighting: 1) reduce intensity (or glare), 2) control spill, 3) reduce duration, and 4) control light spectrum to avoid shorter wavelengths. Additionally, the most important approach to reducing the effects of night lighting on wildlife is to reduce the amount of light reaching sensitive receptors, not to change its spectrum; as if light levels are low enough, no adverse impacts are found (Longcore 2023). This can be achieved by first reducing intensity, controlling direction and duration, and only then looking to spectrum to reduce remaining impacts (Longcore 2023).

As described in Section 2, Project Description, the proposed project would install a modern LED system featuring improved light quality, increased mounting heights with reduced light trespass into adjacent areas, and additional shielding designed to concentrate lighting on the playing surfaces not in the existing habitat nearly 400 feet to the east of the project site. Proposed project vertical light spill near the habitat to the east is estimated in Section 3.1, Aesthetics (see Figures 5 and 6) and Appendix A to be 0.0 footcandles. Due to distance between lighting sources and habitat, installation of hoods, and downward direction of field lights, lighting glare (i.e., maximum intensity) would not significantly affect wildlife behavior or adversely affect wildlife populations over time because wildlife that have remained within the urban-wildlife interface in the project site vicinity are habituated to the nighttime lighting baseline conditions. While the light spectrum of proposed lights would be higher (5,700 K [Appendix A]) than recommended for most wildlife (3,000 K), the duration would be limited because lights would be turned off soon after field use, and intensity (glare) and vertical spill would not significantly affect wildlife behavior or adversely affect wildlife populations, as previously described. Therefore, there would be no significant adverse impacts to wildlife species in the vicinity of the project site as a result of the change in lighting with the proposed project and the qualitative analysis of potential impacts from night lighting (dusk to 10 p.m.) does not further discuss the light spectrum of the proposed project lights.

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. Special-status species include those listed as endangered or threatened under the federal Endangered Species Act or California Endangered Species Act, species otherwise given certain designations by the California Department of Fish and Wildlife, and plant species listed as rare by the California Native Plant Society.

The areas to be disturbed by the proposed project are within the boundary of an existing developed high school. According to Figure 4-1, Vegetation Communities, and Figure 4-3, Open Space Areas, of the Conservation and Open Space Element of the City's General Plan, the SMHS campus is mapped as Urban/Developed land and does not contain, nor is surrounded, by sensitive plant species or open space (City of San Marcos 2012). The SMHS campus is situated near mapped open space (golf course land and San Marcos Creek to the east of campus are mapped as General Plan Open Space) (see Figure 4-3 in City of San Marcos 2012); however, as the project would neither directly effect a special-status species or result in a substantial modification to habitat of a special-status species, substantial adverse effects would not occur. The areas of disturbance associated with the proposed project are developed and support frequent

activities and as such, suitable breeding or foraging habitat does not occur within the campus boundaries. Therefore, impacts would be less than significant.

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?

Less than Significant Impact. No riparian habitat or other natural communities considered sensitive by CDFW are present on the project site. There are also no riparian lands mapped on site (USFWS 2026). The areas to be disturbed by the proposed project are within the boundary of an existing developed high school that does not contain any sensitive natural community or riparian habitat. Accordingly, impacts would be less than significant.

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 also no riparian lands or wetlands mapped on site (USFWS 2026). The areas to be disturbed by the proposed project are within the boundary of an existing developed high school that does not contain any riparian or wetland habitat. No direct impacts associated with the removal, filling, or hydrological interruption of wetlands would occur.

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?

Less than Significant Impact. According to Figure 4-2, Wildlife Corridor and Linkage, of the City's General Plan, there are no wildlife corridors or linkages within the campus (City of San Marcos 2012). While the General Plan notes that wildlife movement occurs along riparian creeks and drainage corridors including along San Marcos Creek that runs to the immediate east of the SMHS campus, the areas to be disturbed by the proposed project are within the boundary of an existing developed high school. Furthermore, and as detailed above in Section 3.1 and Appendix A, proposed project lighting associated with nighttime use of the practice fields would be 0.0 footcandles at the creek corridor. Due to distance between lighting sources and habitat, installation of hoods, and downward direction of field lights, lighting glare (i.e., maximum intensity) would not significantly affect wildlife behavior or movement. Wildlife that have remained within the urban-wildlife interface in the project site vicinity are habituated to the nighttime lighting baseline conditions. In addition, the proposed project would make improvements to the existing campus that does not provide connection for wildlife populations. The proposed project would not remove any trees, which can be used by migratory birds. The project would introduce new lighting sources to the area however; as previously discussed, there would be no significant adverse impacts to wildlife species in the vicinity of the project site as a result of the change in lighting. Therefore, impacts would be less than significant.

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

Less than Significant Impact. The proposed project would not require removal of any trees and not conflict with the provisions of local policies seeking the protection of biological resources including General Plan Policies COS-1.1,COS-1.2, or COS-1.3. Impacts would be less than significant.

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?

Less than Significant Impact. The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. At the time of preparation of this Initial Study/MND, the North County Multiple Species Conservation Plan had yet to be formally adopted (County of San Diego 2026). Furthermore, the project site does not support natural communities and land cover types covered by the City of San Marcos Subarea Plan to the San Diego Multiple Habitat Conservation Program (note that the City of San Marcos Subarea Plan has not been formally adopted by the City and the City has not signed an implementing agreement) (CDFW 2026). Therefore, impacts would be less than significant.

3.5 Cultural Resources

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

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

Less than Significant Impact. Pursuant to Section 15064.5, "historic resources" are 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.

Based on review of the National Register of Historic Places, there are no listed historic resources within 1 mile of the SMHS campus (NPS 2026). Established in the early 1960s, the SMHS campus is not listed as a historical resource in either the National Register of Historic Places or by the California State Parks Office of Historic Preservation (NPS 2026; OHP 2026). In addition to the initial 1960s era disturbance of the approximately 45-acre site to establish the school, the SMHS campus underwent a substantial reconstruction and expansion in 2012 wherein much of the original campus buildings were demolished and replaced with a rebuilt high school (San Marcos Unified School District 2011). The proposed project would not demolish any structures and would not otherwise effect any intact aged structures that could potentially meet the criteria listed above for historic resource eligibility. Because there are no known structures or features on the SMHS campus that would be considered "historically significant" and project components would not alter or otherwise effect a resource or feature eligible for historic resource listing (i.e., the scope of the project is generally limited to the install of field lights on an existing practice field and resurfacing of existing athletic fields), impacts associated with a substantial adverse change in the significance of a historical resource would be less than significant.

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

Less than Significant with Mitigation Incorporated. The installation of field lights and resurfacing of athletic field surfacing is proposed in previously developed areas of the SMHS campus. For example, field lights are proposed to be installed on an existing practice field that was previously disturbed during initial development of the SMHS campus and was extensively graded to support the placement of temporary classrooms during construction of classroom/administration buildings (and subsequent development of athletic facilities). Similarly, proposed resurfacing work at and near the existing SMHS football stadium would occur where established athletic facilities are located and support similar synthetic materials.

According to the EIR prepared for the campus Reconstruction and Expansion Project (San Marcos Unified School District 2011), ground disturbance associated with the project included depths of up to 9 feet in select areas and a significant portion of the campus was graded. In addition, and to accommodate the placement of temporary/modular classroom buildings during demolition of existing permanent buildings and construction of new classroom and administration buildings, the southern portion of the campus weas extensively graded and covered with asphalt (San Marcos Unified School District 2014). In support of the reconstruction and expansion project, a geotechnical evaluation inclusive of subsurface explorations in the form of 46 exploratory borings was completed by Ninyo & Moore (see Appendix E to the EIR for the San Marcos High School Reconstruction and Expansion Project; San Marcos Unified School District 2011). In regard to the practice field location where permanent field lights are proposed by the District, the nearest borings occurred to the east at the site of the existing tennis courts. The boring depth was 16 feet 2 inches and boring logs indicated layers of fill and sand between 0 and 6 feet deep, with the Santiago Formation encountered between depths of 6 and 15 feet, and the Santiago Peak Volcanics formation encountered beyond depth of 15 feet (San Marcos Unified School District 2011). The EIR further detailed that an isolate

archaeological artifact (a stone flake chipped off a larger piece of stone during shaping of the larger stone into a tool) was recorded on the west bank of San Marcos Creek along the southeast site boundary of the SMHS campus and two other cultural resources or artifacts are recorded within 0.5 miles of the project site. Lastly, the EIR concluded that due to the number of artifacts and resources within 0.5 miles of the campus/project site, there was potential for archaeological artifacts and/or resources to be buried on site (San Marcos Unified School District 2011).

As proposed, work would occur in areas that have been subject to past disturbance and ground-disturbing activities associated with the project would generally (with the exception of embedment of foundations for the four new permanent field lights) not extend deeper than past disturbance associated with construction of the 2011 reconstruction and expansion project. Due to proposed depths, proposed lighting pole excavation and foundation work could extend beyond previous disturbance (and layers of fill and sand identified in nearby geotechnical borings completed for the 2011 reconstruction and expansion project) associated with initial and more recent campus development, the potential for encountering archaeological resources during lighting pole excavation work cannot be entirely avoided or discounted. However, if any buried, unknown resources are unearthed during ground-disturbing activities associated with the project, a stop-work would be issued to ensure that an archaeological evaluation may take place to avoid adverse impacts to archaeological resources.

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

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

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

Less than Significant Impact. The project is proposed on an existing high school campus that was previously disturbed during prior development and buildout of the school. Due to previous disturbance, the potential for construction activities to encounter or impact human remains is limited. In the event that human remains are inadvertently encountered during construction activities, such resources would be treated in accordance with state and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately

notified of the discovery. No further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined, within 2 working days of notification of the discovery if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the NAHC within 24 hours. The NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant must then complete their inspection within 48 hours of being granted access to the site. The most likely descendant would then determine, in consultation with the property owner, the disposition of the human remains. Compliance with these regulations would ensure that impacts to human remains resulting from the project would be less than significant.

3.6 Energy

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

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?

Less than Significant Impact. The project would result in an increase in energy consumption during construction and operation, which are addressed separately below.

Construction Emissions

Electricity Usage

Temporary electric power for as-necessary lighting and electronic equipment, such as computers inside temporary construction trailers, would be provided by San Diego Gas and Electric. The electricity used for such activities would be temporary, would be substantially less than that required for project operation and would therefore have a negligible contribution to the project's overall energy consumption.

Natural Gas Usage

Natural gas is not expected to be required during project construction. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the subsection "Petroleum Usage," below.

Any minor amounts of natural gas that may be consumed because of project construction would be temporary and negligible and would not have an adverse effect; therefore, impacts would be less than significant.

Petroleum Usage

Petroleum would be consumed throughout construction of the project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, and vehicle miles traveled associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty construction equipment associated with construction activities and haul trucks are assumed to use diesel fuel. Construction workers would travel to and from the project site throughout the duration of construction (approximately 3 months). It is assumed that construction workers would travel to and from the project site in gasoline-powered vehicles.

Heavy-duty construction equipment of several types would be used during project construction. CalEEMod was used to estimate construction equipment usage; results are included in Appendix B. The estimated diesel fuel usage from construction equipment, haul trucks, and vendor trucks is estimated at 7,307 gallons of diesel fuel. The total fuel usage associated with worker vehicles is estimated at 729 gallons of gasoline. Project construction would not require ongoing or permanent commitment of petroleum resources for this purpose. Therefore, the petroleum demand during short-term construction would be less than significant.

Operational Emissions

The proposed project would not generate additional vehicle trips. The project would require energy for landscape maintenance and the operation of new field lighting. Landscape maintenance equipment is assumed to be gasoline-powered, and field lighting would use electricity. Operational energy use was estimated using CalEEMod (see Appendix B), which indicates that landscape activities would consume approximately 536 gallons of gasoline per year, and field lighting would use approximately 21,865 kilowatt-hours of electricity annually, based on 4 hours of use, four times per week, for 52 weeks. The project's energy demands are not considered intensive and would be comparable to those of similar recreational facilities. Additionally, compliance with applicable Title 24 energy efficiency standards would ensure that energy use is not wasteful, inefficient, or unnecessary. Therefore, operational energy impacts would be less than significant.

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

Less than Significant Impact. The project would be subject to and would comply with, at a minimum, the California Building Energy Efficiency Standards (24 CCR, Part 6). Part 6 of Title 24 establishes energy efficiency standards for residential and nonresidential buildings constructed in California to reduce energy demand and consumption. The proposed project would also be subject to Part 11 of Title 24, also known as the CALGreen building standards. These were adopted into the City's building design criteria. The proposed project would be built and operated in accordance with all existing, applicable regulations at the time of construction. For these reasons stated, the proposed project would result in a less than significant impact associated with the potential to conflict with energy standards and regulations.

3.7 Geology and Soils

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

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.

Less than Significant Impact. There are no Alquist-Priolo fault zones on or adjacent to the SMHS campus (DOC 2026c). Furthermore, the proposed athletic improvements would be installed in accordance with the applicable California Building Code (CBC) and Division of the State Architect (DSA) criteria for seismic safety which would reduce the potential for seismic-related impacts. Therefore, impacts would be less than significant.

ii) Strong seismic ground shaking?

Less than Significant Impact. According to the California Geological Survey, there are no fault zones traversing the SMHS campus or surrounding area (DOC 2026c). Furthermore, the proposed athletic improvements would be installed in accordance with the applicable CBC and DSA criteria for seismic safety which would reduce the potential seismic-related impacts including those associated with strong seismic ground shaking. Therefore, impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. According to the California Geological Survey, the SMHS campus is not in a mapped Liquefaction Zone (DOC 2026c). Furthermore, and based on City mapping, the SMHS campus and surrounding areas are within a Low Susceptibility area for landslides and liquefaction (City of San Marcos 2012).

iv) Landslides?

Less than Significant Impact. The SMHS campus and adjacent areas are relatively flat and include no unusual geographic features or slopes. Furthermore, and based on City mapping, the SMHS campus and surrounding areas are within a Low Susceptibility area for landslides and liquefaction (see Figure 6-1, Geologic Hazards – Soil Slippage Susceptibility [Landslides/Liquefaction] in City of San Marcos 2012). The proposed athletic improvements would be installed in accordance with the applicable CBC and DSA criteria for seismic safety and safety impacts related to landslides would be less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. The existing SMHS campus is developed with school buildings, surface parking lots, athletic facilities and fields, and landscaping. As proposed, the project would require removal and/or demolition of softscape and hardscape areas to accommodate replacement field surfaces, drill holes for the installation of light poles, and utility trenching for the extension of electrical and other utilities. As the project is proposed on a developed campus and ground disturbance would be limited, substantial soil erosion and the loss of topsoil would not occur during project construction. Furthermore, the proposed project would comply with the requirements of the CBC and DSA, and implement best management practices (BMPs), to reduce erosion. Impacts would be less than significant.

c) 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?

Less than Significant Impact. As previously discussed in Impacts 3.7a.iii 3.7a.iv, above, potential impacts associated with liquefaction and landslides would be less than significant due to the SMHS campus being located within a Low Susceptibility area for liquefaction and landslides. Furthermore, the proposed project would comply with the applicable requirements of the CBC and DSA.

Regarding potential impacts associated with lateral spreading (a geotechnical phenomenon characterized by the lateral movement of ground surfaces, often triggered by soil liquefaction during seismic events, leading to significant structural damage), the SMHS campus is located atop relatively flat topography. Therefore, impacts from lateral spreading would be less than significant.

The principal causes of geotechnical subsidence and related collapse include groundwater extraction and mining activities. The City of San Marcos and the SMHS campus are not in areas of recorded subsidence due to groundwater pumping, peat loss, or oil extraction (USGS 2026). The proposed project would also be constructed in compliance with the applicable CBC and DSA requirements. Therefore, potential impacts related to subsidence and collapsible soil would be less than significant.

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?

Less than Significant Impact. According to the Natural Resources Conservation Service Web Soil Survey (USDA 2026b), the soils underlying the SMHS campus are primarily Las Flores-Urban land complex – loamy fine sand, which is moderately well drained (and presents relatively low potential for swelling and shrinking). Moreover, the proposed project would be constructed in compliance with the applicable CBC and DSA requirements. As such, potential impacts related to expansive soils would be less than significant.

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

No Impact. The proposed project would not use any septic tanks or alternative wastewater disposal system. Accordingly, no impact would occur.

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

Less than Significant Impact with Mitigation Incorporated. Paleontological resources or fossils are the remains of ancient plants and animals that can provide scientifically significant information about the history of life on earth. Paleontological "sensitivity" is defined as the potential for a geologic unit to produce scientifically significant fossils. The sensitivity is determined by rock type, history of the geologic unit in producing significant fossils, and fossil localities that are recorded from that unit.

According to surficial geological mapping at a 1:100,000 scale by Kennedy and Tan and the San Diego Natural History Museum (SDNHM or museum) paleontological records search results (SDNHM 2026), the campus is underlain by late Pleistocene to Holocene (less than approximately 129,000 years ago) young

alluvial flood plain deposits (map unit Qya) and the middle Eocene (approximately 49 to 40 million years ago) Santiago Formation (map unit Tsa). The Santiago Formation bedrock underlies the proposed project site and is likely shallowly underlying the young alluvial flood plain deposits per the SDNHM paleontological records search results (SDNHM 2026).

An expedited paleontological records search was requested from the SDNHM on February 11, 2026, and the results were received on February 17, 2026. The museum confirmed published geological mapping for the area and reported that they have 18 fossil localities from the Santiago Formation within a 1-mile radius of the proposed project site, with six of the localities occurring within the proposed project site boundaries. The six fossil localities reported within the proposed project site boundaries were discovered during construction of SMHS (SDNHM 2026). Taxa from these six localities were not disclosed, but of the 18 total fossil localities, they together yielded trace fossil as well as fossilized plants, marine invertebrates, and vertebrates (SDNHM 2026). The Santiago Formation has high paleontological sensitivity or potential (County of San Diego 2009; Deméré and Walsh 1993), and the SDNHM recommended the implementation of a complete paleontological mitigation program if ground-disturbing activities have the potential to impact previously undisturbed portions of the Santiago Formation.

According to the EIR prepared for the campus Reconstruction and Expansion Project (San Marcos Unified School District 2011), ground disturbance across the project extended up to 9 feet in depth in select areas, with a significant portion of the campus having been previously graded. In addition, and to accommodate the placement of temporary/modular classroom buildings during demolition of existing permanent buildings and construction of new classroom and administration buildings, the southern portion of the campus was extensively graded and covered with asphalt (San Marcos Unified School District 2013). In support of the reconstruction and expansion project, a geotechnical evaluation, which included 46 subsurface exploratory borings, was completed by Ninyo & Moore (see Appendix E to the EIR for the San Marcos High School Reconstruction and Expansion Project; San Marcos Unified School District 2011). Regarding the practice field location where permanent field lights are proposed by the San Marcos Unified School District, the nearest borings occurred to the east at the site of the existing tennis courts. The boring depths and observed geological units are presented below:

- Boring number B-36, which is the closest borehole to the proposed project site (approximately 500 feet to the east-northeast), extended to a depth of 16.5 feet below the ground surface (bgs) and encountered clayey sand fill to a depth of 6 feet bgs, alluvium from 6 to 14 feet bgs, followed by the Santiago Formation from 14 feet to the bottom of the borehole at 16.5 feet bgs (San Marcos Unified School District 2011).
- Boring number B-40 extended to a depth of 20 feet bgs and indicated silty sand fill between 0 and 8 feet deep, alluvium from 8 to 14 feet, followed by the Santiago Formation from 14 to the bottom of the borehole at 20 feet bgs (San Marcos Unified School District 2011).
- Boring number B-41 extended to a depth of 16.2 feet bgs and indicated silty to clayey sand fill to a depth of 6 feet bgs, strongly cemented Santiago Formation from 6 to 15 feet bgs, followed by the indurated metavolcanic rocks of the Santiago Peak Volcanics to the bottom of the borehole at 16.2 feet bgs (San Marcos Unified School District 2011).
- Just to the east of the football field, boring number B-43 extended to a depth of 16 feet bgs and indicated asphalt, concrete, and fill to a depth of just over 4 feet bgs, followed by strongly cemented

Santiago Formation silty sandstone to 16 feet bgs where the boring was terminated (San Marcos Unified School District 2011).

- Just to the east of the football field, boring number B-45 extended to a depth of 16 feet bgs and indicated asphalt and concrete to a depth of 3 inches bgs, sandy clay topsoil and colluvium to a depth of 6 feet bgs, followed by moderately to strongly cemented, Santiago Formation silty sandstone to 26 feet bgs where the boring was terminated (San Marcos Unified School District 2011).
- Just to the east of the football field, boring number B-46 extended to a depth of 16.5 feet bgs and indicated asphalt, concrete, and fill to a depth of 4 feet bgs, sandy clay topsoil and colluvium to a depth of 9 feet bgs, followed by weakly to moderately cemented, Santiago Formation silty sandstone to 16.5 feet bgs where the boring was terminated (San Marcos Unified School District 2011).

It should be noted that these boreholes were drilled along the edge of mapped axial channel deposits (alluvium in the geotechnical report) and reflect the subsurface geology in that specific area of the campus. The possibility that the proposed project site was graded and the sediments moved to the area of the tennis courts as fill cannot be ruled out.

Six Santiago Formation fossil localities were identified from within the campus boundaries and an additional twelve from within a 1-mile radius of the campus as a result of the desktop geological and paleontological review. In addition, the proposed project site is not anticipated to be underlain by a unique geological feature. The Santiago Formation has high paleontological resource sensitivity or potential throughout its stratigraphic extent if not previously disturbed, and the young alluvial flood plain deposits have low paleontological resource sensitivity or potential at shallow depths but have the potential to be shallowly underlain by the Santiago Formation in this area. Based on the paleontological records search results, geological map review, and the geotechnical report for the Reconstruction and Expansion Project (San Marcos Unified School District 2011), areas of the proposed project site underlain by the Santiago Formation have high paleontological potential. Planned improvements to the football field require minimal ground disturbance and are not expected to impact the Santiago Formation. However, planned improvements to the southern portion of the campus entail larger amounts of ground disturbance that could impact the Santiago Formation. In the event that intact paleontological resources are discovered on the proposed project site, ground-disturbing activities associated with construction of the proposed project, such as grading and large diameter (2 feet or greater) drilling during site preparation and trenching for utilities, have the potential to destroy a unique paleontological resource or site. The potential for proposed project activities to damage paleontological resources during construction would result in a potentially significant impact. MM GEO-1, presented below, would reduce potentially significant impacts to a less than significant level.

MM GEO-1 Prior to commencement of any grading activity on site, the project applicant shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) 2010 guidelines to prepare a Paleontological Resources Monitoring Plan (PRMP) for the project. The PRMP shall be consistent with the SVP (2010) guidelines and outline requirements for preconstruction meeting attendance and worker environmental awareness training; where paleontological monitoring is required below the level of fill and/or disturbed sediments, within undisturbed Santiago Formation deposits based on construction plans and/or

geotechnical reports; and, procedures for adequate paleontological monitoring and discoveries treatment, including paleontological methods (including sediment sampling for microinvertebrate and microvertebrate fossils), reporting, and collections management. The PRMP shall also include a statement that any fossil lab or curation costs (if necessary, due to fossil recovery) are the responsibility of the project applicant.

3.8 Greenhouse Gas Emissions

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

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. There are currently no established thresholds for assessing whether the GHG emissions of a project, such as the project, would be considered a cumulatively considerable contribution to global climate change; however, all reasonable efforts should be made to minimize a project's contribution to global climate change. In addition, while GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2010), GHG emissions impacts must also be evaluated on a project-level under CEQA.

The analysis in this section is based on the assumptions and methodology included as Appendix B to this Initial Study.

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

Or

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

Less than Significant Impact. The City adopted its Final Climate Action Plan (CAP) on December 8, 2020. The City's CAP meets the requirements under Section 15183.5 of the CEQA Guidelines as a qualified plan for the reduction of GHG emissions for use in cumulative impact analysis pertaining to development projects. The CAP relies on a screening threshold and a CAP Consistency Checklist to determine whether a project's emissions would be consistent with GHG emissions estimated within the City's CAP. Projects that are consistent with the City's CAP, as determined through the CAP Consistency Checklist, would result in a

less than significant cumulative impact regarding GHG emissions. If a project is not consistent with the City's CAP, as determined through the CAP Consistency Checklist, potentially significant cumulative GHG impacts would occur.

In accordance with CEQA Guidelines 15183.5, the project's consistency with the CAP is the sole basis for determining the significance of the project's GHG-related impacts on the environment. Nevertheless, in accordance with CEQA Guidelines Section 15064.4, GHG emissions resulting from construction and operation of the project were quantitatively estimated for informational purposes.

The City's CAP established a GHG screening threshold of 500 metric tons (MT) of carbon dioxide equivalent (CO_2e) per year for new development projects to determine if a project would need to demonstrate consistency with the CAP through the Checklist. Projects that are projected to emit fewer than 500 MT CO_2e annually would not make a considerable contribution to the cumulative impact of climate change and would not need to provide additional analysis to demonstrate consistency with the CAP.

Construction and Operational GHG Emissions

Construction of the project would result in GHG emissions, which are primarily associated with the use of off-road construction equipment, haul trucks, on-road vendor trucks, and worker vehicles. The assumptions used to estimate criteria air pollutant impacts are also relevant for the estimation of construction-related GHG emissions. Details of the assumptions are included in Appendix B. Table 3.8-1 provides a summary of the project's estimated GHG construction emissions.

Table 3.8-1. Estimated Annual Construction Greenhouse Gas Emissions - Unmitigated

Year	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
2026	81.00	<0.01	<0.01	0.03	82.52
Amortized Construction Emissions Over 30 years					2.75

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R=refrigerants, CO_2e = carbon dioxide equivalent.
The values shown are the annual emissions reflect CalEEMod "mitigated" output.
Totals may not add due to rounding.
See Appendix B for complete results.

As shown in Table 3.8-1, the estimated total GHG emissions during construction would be approximately 83 MT CO_2e over the construction period. Estimated project-generated construction emissions amortized over 30 years would be approximately 3 MT CO_2e per year. As with project-generated construction criteria air pollutant emissions, GHG emissions generated during construction of the project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Amortized construction emissions were added to operational emissions of the project for this assessment.

As discussed in Section 3.3 Air Quality, the project would not involve an increase in students or capacity increasing activities that would generate additional motor vehicle trips. The project also does not include any stationary sources. Some landscaping equipment may be used for maintenance of the site and CalEEMod defaults have been included in the estimates. Additionally, the project would result in an increase

in energy use from electricity to power the new field lights. Table 3.8-2 provides a summary of the project's operational GHG emissions for the first full year of operation, which would be 2027.

Table 3.8-2. Estimated Annual Operational Greenhouse Gas Emissions – Unmitigated

Emission Source	CO_2	CH_4	N_2O	R	CO_2e
	metric tons per year				
2027 Annual	5.15	<0.01	<0.01	0.00	5.19
				Amortized 30-Year Construction Emissions	*2.75*
				Project Operations + Amortized Construction Total	**7.94**
				CAP GHG Screening Threshold	**500**
				Exceed Threshold?	**No**

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R=refrigerants; CO_2e = carbon dioxide equivalent
See Appendix B for complete results.

As shown in Table 3.8-2, the project's operational emissions would not exceed 500 MT CO_2e, as such the project is presumed to not make a considerable contribution to the cumulative impact of climate change, and no additional analysis is required to demonstrate consistency with the CAP.

Consistency with Senate Bill 32, Assembly Bill 1279, and Executive Order S-3-05

Executive Order (EO) S-3-05 identified the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050. Senate Bill (SB) 32 establishes a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030. Assembly Bill (AB) 1279 establishes a policy of the state to achieve net zero GHG emissions no later than 2045 and for statewide anthropogenic GHG emissions to be reduced to at least 85% below 1990 levels by 2045.

The City's CAP outlines the measures for the City to achieve its share of state GHG reductions. The City's GHG reduction targets are consistent with the CARB's recommendations for community-wide targets. As discussed in the CAP, by meeting the 2030 target, the City will meet the 2030 state goal identified in SB 32 and maintain a trajectory to meet its proportional share of the 2050 target identified in EO S-3-05. Regarding, AB 1279, it is important to note that the state's carbon neutrality goal does not preclude any individual project from emitting GHG emissions. AB 1279 codifies EO B-55-18, however, its enactment was linked to the concurrent enactment of SB 905, which requires CARB to create a Carbon Capture, Removal, Utilization, and Storage Program that, fundamentally, will sequester carbon emitted by other projects. Therefore, the state's carbon neutrality goal does not preclude all individual projects from emitting GHG emissions.

As discussed above, the project is exempt from a consistency analysis because its emissions would not make a meaningful contribution to cumulative climate change impacts. Therefore, the project is considered consistent with state GHG reduction goals and ongoing progress toward carbon neutrality.

Consistency with SANDAG RTP/SCS

At the regional level, the SANDAG's Regional Transportation Plan (RTP)/ Sustainable Communities Strategy (SCS) has been adopted for the purpose of reducing GHG emissions attributable to passenger vehicles in the San Diego region. In October 2015, SANDAG adopted its Regional Plan, which was subsequently updated in 2021. The RTP/SCS is not directly applicable to the project because the underlying purpose of the RTP/SCS is to provide direction and guidance on future regional growth (i.e., the location of new residential and nonresidential land uses) and transportation patterns throughout the City and greater San Diego County, as stipulated under Senate Bill 375. CARB has recognized that the approved RTP/SCS is consistent with Senate Bill 375. The SANDAG Regional Plan is generally consistent with the local government plans. Since the project is within the scope of development that was anticipated in the General Plan, it would not result in growth that would conflict with the Regional Plan, additionally the project would not add any new vehicle trips.

Conclusion

The project's operational emissions, combined with amortized construction emissions, would remain below the 500 MT CO_2e per year screening threshold. Therefore, no additional consistency analysis with the CAP is required and the project would not result in a considerable contribution to cumulative climate change impacts. Even without amortizing construction emissions, the total construction plus operational emissions would still fall below the screening level. Because the project would not meaningfully contribute to cumulative climate change impacts, it is also presumed not to conflict with the Scoping Plan or the RTP/SCS. Accordingly, the project would result in a less than significant impact related to GHG emissions and potential conflicts with applicable GHG reduction plans.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
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?	☐	☐	☒	☐

a) 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. While construction of the project would require the use of hazardous materials (e.g., oils, lubricants, solvents), these materials would be used, transported and stored in compliance with all applicable local, state, and federal regulations. As under existing conditions, the District would use and store hazardous materials to maintain the SMHS campus including athletic facilities. As such, impacts would be less than significant.

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?

Less than Significant Impact. The use, transport, and storage of hazardous materials during construction of the project would be required to comply with all applicable regulations. The proposed athletic field improvements would occur in existing developed areas and would not place students or the public any closer to existing hazardous conditions or materials. The use of hazardous materials during construction and operation of the proposed project is not anticipated to result in the release of hazardous materials (as previously mentioned, the use, storage, and transport of such materials would comply with all applicable regulations). Accordingly, impacts would be less than significant.

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

Less than Significant Impact. The project is proposed on the campus of an existing school (SMHS) and the SMHS campus is located within approximately 200 feet of an existing public charter school, High Tech High North County. As proposed and similar to most construction projects, the project would require the use of hazardous materials to construct and maintain the proposed improvements. However, the proposed project would not emit excessive hazardous emissions or involve substantial handling of hazardous materials, substances, or wastes. Construction of the project has a relatively brief two-month timeframe (May -July 2026) and the substantial handling of hazardous materials, substances, and waste would not be necessary to operation or maintain on-campus athletic facilities. During the operational phase of the project, there is a potential exposure risk to chemicals associated with synthetic turf materials including lead, flame retardants, PVC vinyl, microplastics, and per- and poly-fluoroalkyl (PFAS) substances. In a 2008 literature review the San Francisco Recreation and Parks Department Task Force evaluated the potential health risks associated with synthetic turf and determined that the benefits outweighed the turf's environmental and health hazards (SFRPD 2008). The report did not find "unacceptable or imminent risk that warranted a moratorium on synthetic turf installation." However, that study did not consider the rising concern of PFAS, which the San Francisco Environment Department is currently, as of February 2026, further evaluating to determine potential health risks (SFED 2026). The City of Palo Alto also evaluated potential health risks and has discovered that the synthetic turf industry is responding to rising concerns related to PFAS by developing reduced or PFAS-free products and use of organic infill materials which can reduce the content of microplastics and PFAS compounds (City of Palo Alto 2025). Therefore, even though there is a lack of sufficient data to conclude on potential health risks from all synthetic turf materials, precautionary industry measures and current available science would indicate that impacts would be less than significant

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

Less than Significant Impact. Government Code Section 65962.5 requires compiling lists of the following types of hazardous materials sites: hazardous waste facilities, hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders, public drinking water wells containing detectable levels of organic contaminants, underground storage tanks with reported unauthorized releases, and solid waste disposal facilities from which hazardous waste has migrated. Four environmental lists, Geotracker (State Water Resources Control Board), EnviroStor (Department of Toxic Substances Control), EnviroMapper (U.S. Environmental Protection Agency), Solid Waste Information System (California Department of Resource Recovery and Recycling) were searched for hazardous materials sites on the project site. The SMHS campus is not listed on the Geotracker, EnviroMapper, or Solid Waste Information System databases (SWRCB 2026; EPA 2026; CalRecycle 2026). The SMHS campus is however shown on the EnviroStor database as having past activity associated with past agricultural programs/uses with a "No Further Action" issued on May 5, 2011 (DTSC 2026).

As the proposed project is located on a developed high school campus and no active hazardous materials sites occur within the project boundaries, implementation of the project would not create a significant hazard to the public or environment. Impacts would be less than significant.

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

No Impact. The nearest airport to the campus is McClellan-Palomar Airport approximately 3.5 miles west of the SMHS campus. According to Figure 6-5, McClellan-Palomar Airport Areas of Influence, of the San Marcos General Plan Safety Element, the majority of the City, including the SMHS campus, is within Review Area 2 (City of San Marcos 2012). Due to the distance of the airport and the SMHS campus, the limited duration of construction, and the presence of existing field lights on the SMHS campus, the proposed project would not interfere with inbound or outbound flights of any airport. Implementation of the proposed project would not result in safety hazards or excessive noise impacts for people residing or working in the project area. Accordingly, no impact would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The proposed project would occur within the existing SMHS high school boundary, and operation of the proposed project would not impair or interfere with any existing emergency response or evacuation plan. All construction staging would be within the boundaries of the campus, and no off-site roadway or lane closure are anticipated. Therefore, impacts would be less than significant.

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

Less than Significant Impact. The SMHS campus and immediate surrounding area is within a Local Responsibility Area and according to Figure 6-4, Fire Hazards Severity Zones, of the City of San Marcos General Plan, is not in a Very High Fire Hazard Severity Zone (VHFHSZ) (City of San Marcos 2012; CAL FIRE 2026) and the proposed project would not change the existing boundaries of the campus such that students or facilities would be placed closer to wildfires (or closer to very high or high fire hazard severity zones). As the campus is in an urbanized area and outside of a VHFHSZ, wildfire impacts would be less than significant.

3.10 Hydrology and Water Quality

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

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction

Less than Significant Impact. Construction of the project would include earthwork activities that could potentially result in erosion and sedimentation, which could subsequently degrade downstream receiving waters and violate water quality standards. Stormwater runoff during the construction phase may contain silt and debris, resulting in a short-term increase in the sediment load of the municipal storm drain system. Substances such as oils, fuels, paints, and solvents may be inadvertently spilled on the project site and subsequently conveyed via stormwater to nearby drainages, watersheds, and groundwater.

For stormwater discharges associated with construction activity in the State of California, the State Water Resources Control Board (SWRCB) has adopted the *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Construction General Permit) (Order WQ 2022-0057-DWQ) to avoid and minimize water quality impacts attributable to such activities. The Construction General Permit applies to all projects in which construction activity disturbs one acre or more of soil. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling and excavation. The Construction General Permit requires the development and implementation of a stormwater pollution prevention plan (SWPPP), which would include and specify water quality BMPs designed to prevent pollutants from contacting stormwater and keep all products of erosion from moving off site into receiving waters. Routine inspection of all BMPs is required under the provisions of the Construction General Permit, and the SWPPP must be prepared and implemented by qualified individuals as defined by the SWRCB.

Because land disturbance for project construction activities would exceed one acre, the District would be required to obtain coverage under the Construction General Permit issued by the SWRCB prior to the start of construction within the project site. Specifically, the Construction General Permit requires that the following be kept on site at all times: (i) a copy of the Notice of Intent to Comply with Terms of the General Permit to Discharge Water Associated with Construction Activity; (ii) a waste discharge identification number issued by the SWRCB; (iii) a SWPPP and Monitoring Program Plan for the construction activity requiring the construction permit; and (iv) records of all inspections, compliance and non-compliance reports, evidence of self-inspection, and good housekeeping practices.

The SWPPP requires the construction contractor to implement water quality BMPs to ensure that water quality standards are met, and that stormwater runoff from the construction work areas do not cause degradation of water quality in receiving water bodies. The SWPPP must describe the type, location, and function of stormwater BMPs to be implemented, and must demonstrate that the combination of BMPs selected are adequate to meet the discharge prohibitions, effluent standards, and receiving water limitations contained in Construction General Permit.

As such, through compliance with the Construction General Permit, the project would not adversely affect water quality. Therefore, short-term construction impacts associated with water quality would be less than significant.

Operation

Once constructed, stormwater runoff from the project could contribute pollutants to off-site discharges if not managed appropriately. However, the proposed project does not include any substantive changes in stormwater runoff. The project characteristics consist primarily of replacement of existing artificial turf with new artificial turf and rubberized surfacing. Some additional new impervious surfaces (concrete area for the shot put area) would be introduced however compared to the study area this would represent a negligible increase in impervious surfaces and runoff would easily be drained by the surrounding pervious area.

The replacement of the existing artificial turf field areas with new artificial turf and rubberized surfaces as well as the addition of another artificial turf area could incrementally increase the potential sources of microplastics and per- and poly-fluoroalkyl (PFAS) substances. The presence of these potential sources of contaminants are not well studied but could potentially leach into groundwater and adversely affect water quality. Reportedly, the synthetic turf industry is responding to rising concerns related to PFAS through introduction of reduced or PFAS-free products and use of organic infill materials which can reduce the release of microplastics and PFAS compounds (City of Palo Alto 2025). According to a study by the New Jersey Department of Environmental Protection, the leachate potential of PFAS from synthetic turf is limited (City of Palo Alto 2025). Santa Clara County also conducted a literature review and determined that while PFAS in synthetic turf represents a potential risk to the environment, the extent of the risk is uncertain (City of Palo Alto 2025).

Stormwater quality within the San Diego Region (of which the project site is a part) is managed by the San Diego Regional Water Quality Control Board (RWQCB), which administers the *NPDES Permit and Waste Discharge Requirements for the San Diego Region* (Municipal Separate Storm Sewer System [MS4] Permit). The MS4 Permit includes the City of San Marcos among the co-permittees that are subject to waste discharge requirements under the permit. The MS4 Permit requires co-permittees to implement a development planning program to address stormwater pollution. For the City of San Marcos, stormwater pollution control is contained within the City's Municipal Code 14.15 Storm Water Management and Discharge Control. These programs require project applicants for certain types of projects to implement a Water Quality Management Plan (WQMP) throughout the operational life of each project. The purpose of a WQMP is to reduce the discharge of pollutants in stormwater and to eliminate increases in pre-existing runoff rates and volumes by outlining BMPs, which must be incorporated into the design plans of new development and redevelopment.

Per the MS4 Permit, the proposed project must include drainage control features in the project design to ensure that water quality in any off-site discharges is protected. The project would be required to manage and treat stormwater flows to the maximum extent practicable to control pollutants, pollutant loads, and runoff volume emanating from the project site by: (1) minimizing the impervious surface area and implementing source control measures, (2) controlling runoff from impervious surfaces using structural BMPs (e.g., infiltration, bioretention, and/or rainfall harvest and reuse), and (3) ensuring all structural BMPs are monitored and maintained for the life of the project.

In summary, project grading and construction would be completed in accordance with an NPDES-mandated SWPPP, which would include standard BMPs to reduce potential off-site water quality impacts related to erosion and incidental spills of petroleum products and hazardous substances from equipment. Storm

water runoff during project operations would be managed through a mixture of strategies that would be designed to remove pollutants from on-site runoff prior to discharge into the storm drain system to the maximum extent practicable, as required by MS4 and as would be demonstrated in the project-specific WQMP. The potential risk of PFAS leachate could be minimized by the use of more modern synthetic turf materials that are designed to reduce PFAS concentrations Therefore, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality and water quality impacts would be less than significant.

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?

Less than Significant Impact. The City's water supplies are provided by Vallecitos Water District (VWD) which is a member agency of the San Diego Water Authority (SDWA) and imports or purchases 100% of its potable water supply from SDWA and the Claude "Bud" Lewis Desalination Plant in the City of Carlsbad (VWD 2021). Through their SDCWA contract, VWD also pays for raw water treatment at Olivenhain Municipal Water District's David C. McCollom Water Treatment Plant. Local groundwater supplies have historically not been used by VWD due to uncertain quantity and relatively poor quality (VWD 2021).

The proposed project would replace an existing artificial turf field and also convert an existing turf field with an artificial turf field which would overall result in a reduction in water demand.

As noted above, the proposed improvements at the project site would not include any substantive changes to impervious surfaces. As a result, there would be negligible changes to groundwater recharge associated with the proposed project. Therefore, following construction, the project would have a reduced water demand compared to existing conditions where the water supply is not even sourced by local groundwater, and there would be negligible changes to groundwater recharge. As a result, the potential impact related to groundwater supplies, groundwater recharge and sustainable groundwater management of the groundwater basin would be less than significant.

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

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

Less than Significant Impact. The project site is relatively close to San Marcos Creek but would not alter or change the course of the creek. Project construction would involve some earth-disturbing activities, including grading, that could expose on-site soils to erosion and surface water runoff. However, inclusion of project BMPs would reduce erosion and siltation from the project site occurring from construction activities. In addition, the project site is located within a developed area. As such, the development of the project would not cause a significant change to surface bodies of water in a manner that could cause siltation or erosion. In addition, as discussed above in a), construction of the project would include drainage control features in accordance with MS4 Permit requirements which would reduce the potential for any erosion or siltation as demonstrated in the project-specific WQMP. Therefore, impacts would be less than significant.

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

Less than Significant Impact. As discussed in the response to a) above, the project would not result in any substantive increase in new impervious surfaces on the project site. As such, stormwater runoff would be directed to catch basins on site in accordance with drainage control requirements which would include measures for volume control. Further, the project would comply with existing local, state, and federal regulations related to drainage and runoff. As such, the project would not result in flooding on or off site. Therefore, impacts associated with altering the existing drainage pattern and flooding would be less than significant.

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

Less than Significant Impact. As previously discussed in response to a) above, the project would not substantively increase the area of impervious surfaces on the project site. Thus, the project would not substantively increase the amount of runoff water entering the stormwater drainage systems. All proposed improvements are subject to applicable stormwater regulatory requirements including the City's Municipal stormwater code. As a result, the project's contribution to runoff water is not expected to exceed the capacity or existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. However, should excess flows occur, runoff water would then be routed to the public storm drain system.

Additionally, as discussed in a), project construction would be completed in accordance with an NPDES-mandated SWPPP, which would include standard BMPs to reduce potential off-site water quality impacts. Surface water runoff during project operations would be managed through the treatment BMP that would be designed to remove pollutants from on-site runoff prior to discharge into the storm drain system to the maximum extent practicable, as required by MS4 and as required in a project-specific WQMP**.** Therefore, impacts would be less than significant.

iv) Impede or redirect flood flows?

Less than Significant Impact. The project site is not located within a Federal Emergency Management Agency 100-year flood hazard zone, although there is a 100-year flood zone mapped immediately adjacent to the project site associated with Upper San Marcos Creek (FEMA 2026). However, the proposed improvements do not have substantive above ground profiles and would not impede or redirect flood flows even in the event of a flood. Therefore, there would be a less than significant impact associated with impeding or redirecting flood flows.

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

Less than Significant Impact. The project would not likely be susceptible to flood hazards, tsunami, or seiche. As noted above, the project site is outside of a 100-year flood zone. The project site is also almost 7 miles inland from the coast and as a result outside of any tsunami hazard zone. Seiche wave hazards are generally associated with oscillation of enclosed bodies of water typically caused by ground shaking

associated with a seismic event. While the project site boundary is located within 500 feet of an enclosed body of water, Lake San Marcos, the risk is likely low due to the distance to the proposed improvements combined with the characteristics of the proposed improvements that are unlikely to become substantively damaged even if seiche waves would reach them. Therefore, less than significant impacts associated with seiche, tsunami, or flooding would occur.

e) ***Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

Less than Significant Impact. The project site is located within the jurisdiction of the San Diego RWQCB. As discussed above in a), the project would comply with all regional and local regulations related to water quality control of site runoff which is consistent with the policies and objectives of the San Diego RWQCB Basin Plan. The project is not located within an identified groundwater basin or subbasin that is being managed by a sustainable groundwater management plan and the proposed project is replacing sports fields and associated improvements at an existing school. In addition, groundwater is not a local source of water supply. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

3.11 Land Use and Planning

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

a) ***Would the project physically divide an established community?***

No Impact. The proposed project would occur on an existing high school campus and implementation of the project would not physically divide an established community. Therefore, no impact would occur.

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 would occur on an existing high school campus within an urbanized area. No land use changes would occur or would be required to implement the project as proposed. The proposed project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.

3.12 Mineral Resources

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

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

No Impact. The proposed project would occur on an existing high school campus within an urbanized area. The proposed project does not include the extraction of mineral resources. The SMHS campus is within an area mapped by the Department of Conservation Mineral Land Classification Map as MRZ-4 (areas where there is not enough information available to determine the presence or absence of mineral deposits), and implementation of the proposed project would not result in the loss of availability of a known mineral resource. No impact would occur.

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 SMHS campus is within an area mapped by the Department of Conservation Mineral Land Classification Map as MRZ-4 (areas where there is not enough information available to determine the presence or absence of mineral deposits). Furthermore, the General Plan's Conservation and Open Space Element does not identify any active mines or quarries in the City (City of San Marcos 2012). The proposed project would occur on the existing SMHS campus that is surrounded by urban development. Implementation of the proposed project would not result in the loss of availability of a known mineral resource and accordingly, no impact would occur.

3.13 Noise

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

This section is based on technical analysis conducted by Dudek, including quantitative predictions of noise emissions based on assumptions developed in consultation with the project design engineers. The results of the noise prediction modeling are provided as Appendix C, Noise Modeling Inputs and Outputs, to this MND.

Existing Setting

The SMHS campus is bordered to the north by San Marcos Boulevard, and further north by commercial uses and a healthcare center/skilled nursing facility (Brookdale Senior Living). Discovery Street, San Marcos Creek, single-family residences and the Links at Lakehouse golf course are on the east. On the south, the campus is bordered by La Casita Drive which is lined with single-family residences. The western boundary of the campus is bordered by a small automotive repair shop and single-family residences (La Bonita Drive parallels a portion of the campus' western boundary). Nearby properties are designated for Commercial (C), Specific Plan Area (SPA), Open Space (OS), Low-Density Residential (LDR) and Medium-Density Residential (MDR) use; and are zoned Commercial, Senior Residential (SR), and Open Space.

Represented by short-term (ST) and long-term (LT) locations ST1, ST2, ST3, ST4, LT1, and LT2 in Table 3.13-1, the existing outdoor ambient sound environment of the project location was sampled during a field survey conducted on January 13 and 14, 2026 (see Figure 9, Baseline Outdoor Ambient Sound Level Measurements). These ambient noise monitor locations are intended to be representative of the existing single-family residences and noise-sensitive land uses (NSLUs) adjoining the project area. ST measurements were 15 minutes in duration, whereas LT measurements were collected over a 24-hour

period. Collected sample sound pressure level measurements at these locations, along with documented investigator observations regarding perceived or witnessed acoustical contributors to this baseline or pre-project noise environment, also appear in Table 3.13-1. Photographs, tagged survey positions, instrument details, and 24-hour noise measurement data plots can be found in Appendix C.

Table 3.13-1. Measured Samples of Existing Outdoor Ambient Sound Level

Survey Position	Location	Time	Daytime L_{eq} (dBA)	Daytime L_{90} (dBA)	Notes (Perceived Sound Sources)
ST1	South of existing SMHS soccer fields along La Casita Drive	9:40 a.m.– 9:55 a.m., 1/13/26	47	40	Birds, Distant Conversations, Distant Aircraft, Distant Landscape Noise
ST2	North of SMHS main stadium along San Marcos Boulevard	10:52 a.m.– 11:07 a.m., 1/13/26	74	59	Traffic on San Marcos Boulevard, Birds, Distant Conversations
ST3	East of SMHS campus along San Pablo Drive	10:28 a.m.– 10:43 a.m., 1/13/26	55	47	Traffic on San Pablo Drive, Distant Aircraft, Distant Conversations
ST4	West of SMHS baseball fields along La Bonita Drive	10:00 a.m.– 10:15 a.m., 1/13/26	54	48	Traffic on La Bonita Drive, Birds, School Bells
LT1	Adjacent to ST1	10:00 a.m. – 10:00 a.m., 1/13/26 - 1/14/26	52	41	Traffic, Birds, Distant Conversations, Rustling Leaves
LT2	Adjacent to ST2	10:00 a.m. – 10:00 a.m., 1/13/26 - 1/14/26	71	58	Traffic on San Marcos Boulevard, Birds, Distant Conversations

Source: Appendix C.
Notes: Daytime = 7:00 a.m. to 10:00 p.m.; L_{eq} = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels; L_{max} = maximum sound level during the measurement interval; L_{90} = sound level exceeded 90% of the time.

The measured daytime (7:00 a.m. to 10:00 p.m.) outdoor energy-equivalent sound level (L_{eq}) values appearing in Table 3.13-1 range from 47 to 74 A-weighted decibels (dBA) and are consistent with expectations for the environment based on the distance to (or from) roadways like San Marcos Boulevard. Measured sound levels were highest at LT2/ST2 due to the proximity to San Marcos Boulevard, and sound levels were lower at LT1/ST1, ST3, and ST4 due to their location along low-traffic roadways in residential neighborhoods.

Regulatory Setting and Thresholds of Significance

City of San Marcos Municipal Code

The City of San Marcos Municipal Code Chapter 10.24: Noise (City of San Marcos 2017) addresses construction noise. Erection and demolition of buildings is exempt between 7:00 a.m. and 6:00 p.m. Monday through Friday and on Saturdays from 8:00 a.m. to 5:00 p.m. The Municipal Codes does not set noise limits

on construction activities. Commonly, the City has utilized the County of San Diego's Noise Ordinance construction noise limit of 75 dBA (8-hour average) as received by occupied residential properties.

Chapter 20.300 (Site Planning and General Development Standards) of the City's Municipal Code includes noise regulations in the form of noise standards by zone (Section 20.300.070, Performance Standards). It should be noted that Municipal Code noise standards typically pertain to stationary (i.e., non-transportation-related) noise sources. The relevant portions of these noise standards are provided below:

1 Noise shall be measured with a sound-level meter that meets the standards of the American National Standards Institute (ANSI) (Section S1.4-1979, Type 1 or Type 2). Noise levels shall be measured in decibels at the property line of the receptor property, and at least five (5) feet above the ground and ten (10) feet from the nearest structure or wall. The unit of measure shall be designated as an A-weighted decibel (dBA) Leq standard. A calibration check shall be made of the instrument at the time any noise measurement is made (Ord. No. 2017-1446, 7-25-2017)

2 No person shall create or allow the creation of exterior noise that causes the noise level to exceed the noise standards established by Table 20.300-4 (shown herein as Table 3.13-2). Increases in exterior noise levels listed in Table 20.300-4 are permitted but depend on cumulative duration of the increase within the measured hour. For instance, a 5 dB increase is allowed for up to fifteen (15) minutes within the hour, but a 10 dB increase above the limit is allowed for only up to 5 cumulative minutes within that hour.

Table 3.13-2. Measured Samples of Existing Outdoor Ambient Sound Level

Zone	Applicable Limit (decibels)	Time Period
Single-Family Residential (A, R-1, R-2) [1, 2]	60 50	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.
Multifamily Residential (R-3) [1, 2]	65 55	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.
Commercial (C, O-P, SR) [3]	65 55	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.
Industrial	65 60	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.

Source: City of San Marcos 2017 (Table 20.300-4).
Notes:

1 For single-family detached dwelling units, the "exterior noise level" is defined as the noise level measured at an outdoor living area that adjoins and is on the same lot as the dwelling and that contains at least the following minimum net lot area: (i) for lots less than 4,000 square feet in area, the exterior area shall include 400 square feet; (ii) for lots between 4,000 square feet to 10 acres in area, the exterior area shall include 10% of the lot area; (iii) for lots over 10 acres in area, the exterior area shall include 1 acre.

2 For all other residential land uses, "exterior noise level" is defined as noise measured at exterior areas that are provided for private or group usable open space purposes. "Private Usable Open Space" is defined as usable open space intended for use of occupants of one dwelling unit, normally including yards, decks, and balconies. When the noise limit for Private Usable Open Space cannot be met, then a Group Usable Open Space that meets the exterior noise level standard shall be provided. "Group Usable Open Space" is defined as usable open space intended for common use by occupants of a development, either privately owned and maintained or dedicated to a public agency, normally including swimming pools, recreation courts, patios, open landscaped areas, and greenbelts with pedestrian walkways and equestrian and bicycle trails, but not including off-street parking and loading areas or driveways.

3 For nonresidential noise-sensitive land uses, exterior noise level is defined as noise measured at the exterior area provided for public use.

City of San Marcos General Plan

The Noise Element of the City of San Marcos General Plan (City of San Marcos 2012) establishes target maximum noise levels in the City. Table 7-3 in the City's Noise Element depicts "acceptable," "conditionally acceptable," and "unacceptable" transportation-related exterior noise levels for the indicated land use designations.

The project's consistency with applicable General Plan goals and policies is discussed in Section 3.11, Land Use and Planning, and the project would be consistent with the applicable goals and policies.

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

Less than Significant Impact.

Construction

Construction of the project would result in the temporary generation of noise at the project site. Construction would involve the use of heavy equipment and machinery, such as excavators, loaders, cranes, temporary generators, scrapers, and other equipment. Construction would generate levels of noise that can vary from hour to hour and day to day depending on the equipment in use, the operations being performed, and the distance between the source and receptor. Typically, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 3.13-3 provides a list of the sound levels generated by various powered equipment that could be associated with construction of the project, measured at a distance of 50 feet using a "slow" response time constant (1 second). Sound source information was obtained from the Noise Source Database developed under National Cooperative Highway Research Program 25-49 (NCHRP 25-49), Development of a Highway Construction Noise Prediction Model (NASEM 2022).

Table 3.13-3. Sound Levels of Typical Construction Equipment

Equipment	Maximum Sound Level (dBA L_{max}) at 50 feet from Source	Equivalent Sound Level (dBA L_{eq}) at 50 feet from Source
Air Compressor	67	66
Aerial Lift (Man Lift)	73	72
Backhoe	84	76
Compactor (Plate)	75	N/A
Compactor (Roller)	83	N/A
Concrete Mixer	82	81
Concrete Saw	88	85
Crane, Mobile	76	74
Dozer	86	80
Forklift	88	N/A

Table 3.13-3. Sound Levels of Typical Construction Equipment

Equipment	Maximum Sound Level (dBA L_{max}) at 50 feet from Source	Equivalent Sound Level (dBA L_{eq}) at 50 feet from Source
Generator	68	67
Grader	79	N/A
Horizontal Bore Drill	88	87
Loader	81	72
Paving - Asphalt	83	N/A
Paving - Concrete	88	85
Pump	74	73
Scraper	92	N/A
Flatbed Truck	74	N/A
Welding Machine	72	71

Source: NASEM 2022.
Notes: dBA = A-weighted decibel; L_{max} = maximum instantaneous noise level. N/A = Equipment without average (Leq) noise levels are non-stationary and best represented only by maximum instantaneous noise level (L_{max}).

Aggregate noise emission from construction activities, broken down by phase, was predicted at the following NSLUs: 1) Brookdale Senior Living, approximately 180 feet north of the SMHS main stadium; 2) single-family residences along San Pablo Court, approximately 655 feet east of the SMHS main stadium; 3) single-family residences along La Casita Drive, approximately 120 feet south of the SMHS soccer fields; and 4) single-family residences along La Bonita Drive, approximately 750 feet west of the SMHS soccer fields. The construction activities that are expected to occur, grouped by phase, are shown in Table 2-1 (refer to Section 2.4, Project Construction and Phasing).

Using the roster from Table 2-1 as guidance for input parameters, and as detailed in the worksheets appearing in Appendix C, combined construction noise emission for each listed phase was predicted with a model that emulates an updated version of the Federal Highway Administration Roadway Construction Noise Model (RCNM) and utilizes its reference sound level data by equipment type (e.g., selected data from Table 3.13-3) (FHWA 2018). The predicted noise level exposures from the proposed construction activities are summarized in Table 3.13-4.

Table 3.13-4. On-Site Construction Noise Model Results Summary

Construction Phase	Construction Noise at Nearest NSLU[a]			
	Brookdale Senior Living (North, 180 feet)	San Pablo Ct Residences (East, 655 feet)	La Casita Dr Residences (South, 120 feet)	La Bonita Dr Residences (West. 750 feet)
Demolition[b]	71	55	70	54
Grading	65	50	65	48
On-Site Utilities	70	54	70	53
Paving	74	59	74	57
Architectural Coating	65	50	65	48

Notes: See Appendix C for complete results.
[a] Per Chapter 10.24: Noise of the City Municipal Code, the construction noise limit for equipment is 75 dBA L_{eq}, over 8-hours at the nearest occupied property.
[b] Predictive analysis assumes a concrete saw is used behind 4' x 8' plywood sheeting during construction.

As presented in Table 3.13-4, construction noise during all phases would not exceed 75 dBA 8-hour L_{eq} at the nearest NSLUs to the project in all four cardinal directions. Thus, construction noise is predicted to comply with Chapter 10.24 of the City Municipal Code. Estimated construction noise levels are predicted to reach up to 74 dBA L_{eq} over an 8-hour period at the nearest existing residences to the south along La Casita Drive and to the north at Brookdale Senior Living during Paving activities. Such levels would be between 22 to 27 dBA higher than existing outdoor ambient noise levels measured at LT1/ST1, which would be clearly noticeable and may result in annoyance to residents at times during construction; however, with construction limited to daytime hours (avoiding sleep disruption), given that construction would require not more than 2 months (refer to Table 2-1), and considering that interior noise levels would not reach greater than approximately 50 dBA (with windows and doors closed), this temporary increase over ambient noise levels should be tolerable. The 74 dBA 8-hour L_{eq} would only be up to 3 dBA higher than measured ambient noise at LT2/ST2 (Table 3.13-1). Construction noise levels at residences along San Pablo Court would be up to 4 dBA higher than the measured ambient noise levels at ST3, or 3 dBA higher than the measured ambient at ST4 (La Bonita Drive) during the Paving phase. Thus, project construction noise would be considered a less than significant impact.

Operation

Upon completion of construction, the project proposes replacing the existing synthetic turf, track, shot put areas, pole vault and long jump runways at the SMHS main football stadium with new, comparable synthetic surfaces, and would add permanent nighttime sports lighting to the multi-purpose field in the southern portion of the SMHS campus. As a result, usage of the main football stadium and new multi-purpose field would extend later into the evening but would feature similar noise-generating activities as before (e.g., soccer practice, football games, etc.). No activities are expected to occur during nighttime hours (10:00 p.m. to 7:00 a.m.).

Section 20.300.070, Performance Standards of the City's Municipal Code sets forth a 60 dBA $L_{eq(1\text{-}hr)}$ limit at single-family residences, or 65 dBA $L_{eq(1\text{-}hr)}$ at multifamily residences, during daytime hours, defined as 7:00 a.m. to 10:00 p.m. While activities at the main stadium and multi-purpose field are expected to extend into evening hours, these later times are still considered "daytime" and thus are still held to the same threshold at nearby NSLUs as before; additionally, no new noise-generating activities, electro-mechanical equipment, or additional traffic will be introduced upon the completion of project construction, and operational noise level are expected to comparable to existing levels.

However, Dudek has modeled the propagation of sound from a combination of anticipated sports activities at the main stadium and multi-purpose field using commercially available Datakustik CadnaA software, that has algorithms based on the International Organization of Standardization (ISO) Standard 9613-2, "Attenuation of Sound During Propagation Outdoors, Part 2: Engineering method for the prediction of sound pressure levels outdoors" (ISO 2024). The modeled scenario included the following operating assumptions for the anticipated noise sources sound power level (L_w) and model input parameters:

- 200-person crowd with "loud voices" at the main stadium (102 dBA L_w), and "Youth Soccer Practice" (89 dBA L_w) at the multi-purpose field, per Hayne et al. (2006) "Prediction of Crowd Noise;"
- 3-dimensional rendering of SMHS campus buildings adjacent to proposed field improvements;

- Reflection order of 1, ground absorption coefficient = 0.8 (i.e., reflective of a mix of soft, absorptive ground and hard, reflective surfaces), temperature of 68 degrees and 50% relative humidity; and
- Conservative consideration of topography on site and the surrounding area.

Table 3.13-5 presents the predicted operational noise levels at the nearest occupied NSLUs in each cardinal direction. Figure 10, Predicted Stationary Source Operation Noise from Proposed Project, presents color-coded bands of propagating project-only operational noise levels at each of the four receivers.

Table 3.13-5. Operational Noise Modeling Results

Modeled Receiver ID	Receiver Location	Operational Noise Levels (dBA $L_{eq(1\text{-}hour)}$)
R1	Brookdale Senior Living (North, 180 feet)	46
R2	San Pablo Ct Residences (East, 655 feet)	37
R3	La Casita Dr Residences (South, 120 feet)	38
R4	La Bonita Dr Residences (West. 750 feet)	30

Notes: See Appendix C for complete results.

[a] Per Section 20.300.070 of the City Municipal Code, the exterior noise limit for occupied NSLUs is 60 dBA $L_{eq(1\text{-}hr)}$ for single-family residences, or 6 dBA $L_{eq(1\text{-}hr)}$ for multifamily residences.

As shown in Table 3.13-5, predicted operational noise levels at the four modeled nearest NSLUs would comply with the City's exterior limit for multifamily residences (R1) of 65 dBA $L_{eq(1\text{-}hr)}$ and for single-family residences (R2—R4) of 60 dBA $L_{eq(1\text{-}hr)}$. Thus, long-term project operational noise would result in a less than significant impact.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact. Vibration is oscillatory movement of mass (typically a solid) over time. Depending on their distances to a sensitive receptor, operation of large bulldozers, graders, loaded dump trucks, or other heavy construction equipment and vehicles on a construction site have the potential to cause high vibration amplitudes.

For purposes of this impact assessment, a vibration velocity level of 0.2 inches per second (ips) peak particle velocity (PPV) is used as the standard for evaluating human annoyance (to perceived ground-borne vibration within an occupied structure) and for the potential risk of residential building damage due to "continuous" or frequently occurring ground-borne vibration events (Caltrans 2020).

Ground-borne vibration attenuates rapidly, even over short distances. The attenuation of ground-borne vibration as it propagates from source to receptor through intervening soils and rock can be estimated with expressions found in Federal Transit Administration (FTA) and the California Department of Transportation guidance. By way of example, for a roller operating as close as 120 feet to the nearest receiving sensitive land use during the Paving construction phase, the estimated vibration velocity level would be 0.02 ips per the equation as follows (FTA 2018):

$$PPV_{rcvr} = PPV_{ref} \times (25/D)^{1.5} = 0.020 \text{ ips PPV} = 0.21 \times (25/120)^{1.5}$$

In the above equation, PPV_{rcvr} is the predicted vibration velocity at the receiver position (i.e., residence), PPV_{ref} is the reference value at 25 feet from the vibration source (the roller), and D is the actual horizontal distance to the receiver from the source.

Based upon the identified distance between construction activities and the closest existing residential structures, predicted ground-borne vibration velocity PPV values associated with project construction are below the 0.2 ips PPV threshold for building occupant annoyance and building damage risk. Impacts during construction would be less than significant.

Once operational, the proposed project would not be expected to feature major producers of ground-borne vibration. For this reason, operational ground-borne vibration at off-site receptors would be considered less than significant.

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

No Impact. There are no private airstrips within the vicinity of the project site. The closest airport to the project site is McClellan-Palomar Airport, approximately 4 miles west of the site. According to the Comprehensive Land Use for McClellan-Palomar Airport (SDCRAA 2011) the project site is not located within a noise exposure contour and would therefore not expose people residing or working in the project area to excessive noise levels.

3.14 Population and Housing

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

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 not result in changes to student enrollment and would not change capacity of SMHS. The project would serve students living in the area and would not directly or indirectly induce unplanned population growth in the area. Thus, no impacts associated with population growth would occur.

b) ***Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

No Impact. The project entails improvements to existing campus athletic facilities would not require the relocation or construction of replacement housing. The project would also not displace people or housing. Therefore, no impact would occur.

3.15 Public Services

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

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. The San Marcos Fire Department (SMFD) provides fire and emergency medical services to the City of San Marcos, including SMHS. The nearest SMFD station to the campus is SMFD Fire Station 2 at 1250 Rancho Santa Fe Road, approximately 0.66 miles southwest of the campus. The proposed project encompasses improvements to the District's sports facilities and would not increase

enrollment or capacity at SMHS. Additionally, the proposed project would not modify any existing fire lanes at the school. The project site is currently served by SMFD, and the proposed project would accommodate the existing school students and athletics programming. Therefore, impacts would be less than significant.

Police protection?

Less than Significant Impact. The SMHS campus and the surrounding areas are already served by the existing San Diego County Sheriff Department's San Marcos Station at 182 Santar Place, approximately 2 miles northeast of the campus. The proposed project would not substantially increase the need for police protection service because the student enrollment and capacity would not increase. The proposed project would not require the San Diego County Sheriff Department to expand or build new facilities, and impacts would be less than significant.

Schools?

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

Parks?

No Impact. The proposed project entails improvements to existing on-campus athletic facilities and proposes, amongst other components, the installation of field lights at an existing, unlit practice field. The project would not induce growth or otherwise influence housing in the area to create additional demand for park space. No physical impacts to parks and recreation would occur.

Other public facilities?

No Impact. The proposed project would not result in impacts associated with the provision of other new or physically altered public facilities (e.g., libraries, hospitals, childcare, teen or senior centers). The proposed project would not induce population growth, and no impacts would occur.

3.16 Recreation

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

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

No Impact. Implementation of the proposed project would entail improvements to the existing athletics facilities on the SMHS campus. See Figure 4. The proposed project would accommodate the existing school programs and students already served by the District. The proposed project would not increase capacity or the number of people using existing parks and recreation facilities. No impact would occur.

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

Less than Significant Impact with Mitigation Incorporated. As required by CEQA, the potential physical effects of the project (which consists of the construction and operation of certain athletic field improvements on the SMHS campus) are disclosed in this Initial Study/MND. The District is proposing select improvements to athletic facilities at SMHS; the project does not require the construction or expansion of recreational facilities other than what is proposed by the project. As discussed throughout this document, construction and operation of the proposed project would not result in adverse physical effects on the environment with the implementation of mitigation measures. See Sections 3.4 and 3.18 for additional detail. With the implementation of mitigation measures, impacts would be less than significant and no other mitigation measures are required.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
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?	☐	☐	☒	☐

a) 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. The project proposes replacing existing synthetic turf at the SMHS football stadium with new synthetic turf surfaces and replacing existing synthetic track surface near the existing track with three sand volleyball courts. Additionally, the project proposes replacing an existing natural turf practice field area with new synthetic turf and installing permanent field lights (4) at the practice field. The project would not result in changes to student enrollment or staff or any activities that are currently occurring at SMHS.

Similar to existing conditions, SMHS and components of the proposed project would be accessed via San Marcos Boulevard. San Marcos Boulevard is classified as an Arterial in the City of San Marcos General Plan Existing Conditions Report (City of San Marcos 2021). San Marcos Boulevard is constructed with three lanes in the eastbound direction and two lanes in the westbound direction, a landscaped median, and a Class II bike lane. Near SMHS, Rancho Sante Fe Road is a north-south Arterial that also includes bike lanes. There are two travel lanes in each direction with a landscaped median on Rancho Santa Fe Road. On-street parking is prohibited along San Marcos Boulevard and Rancho Santa Fe Road. Discovery Street is classified as Major Arterial and is constructed as a two-lane roadway near SMHS. There is no vehicular or pedestrian access to SMHS from Discovery Street and Rancho Santa Fe Road.

The North County Transit District provides public transportation within the city and near SMHS. Bus service is provided by BREEZE Routes 445, 304 and 604 along San Marcos Boulevard and Rancho Santa Fe Road. The nearest bus stops for Route 445 are located at the intersections of Knight Realm and Discovery Street with San Marcos Boulevard in the eastbound and westbound directions. The nearest bus stops for Routes

304 and 604 are near the intersection of Ranch Santa Fe Road and San Marcos Boulevard in the northbound and southbound directions.

Both roadways (San Marcos Boulevard and Rancho Santa Fe Road) are constructed with paved sidewalks and provide connectivity with the adjoining areas that are generally built out. The intersections of San Marcos Boulevard with Rancho Santa Fe, Knights Realm and Discovery Street are signalized. The intersections have pedestrian phases and crosswalks that facilitate pedestrian movement near SMHS.

As described, the existing roadways, bicycle, transit, and pedestrian facilities would continue to serve the project and no change would occur. As such, the project would generate temporary construction trips in the short-term and no change would occur due to long-term operation. Furthermore, the project would not conflict with or impede implementation of a program, plan, or ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less than Significant Impact. The Governor's Office of Planning and Research (OPR) renamed as Land use and Climate Innovation (LCI) approved the addition of Section 15064.3, "Determining the Significance of Transportation Impacts" to the State's CEQA Guidelines, compliance with which has been required since July 1, 2020. The CEQA Guidelines state that "generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts" and define VMT as "the amount and distance of automobile travel attributable to a project." It should be noted that "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. OPR has clarified in the Technical Advisory and recent informational presentations that heavy-duty truck VMT is not required to be included in the estimation of a project's VMT. Other relevant considerations may include the effects of the project on transit and non-motorized traveled.

To aid in this transition, OPR released a Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) (OPR 2018). Based on the Technical Advisory, the City of San Marcos has also adopted VMT specific guidelines, screening criteria and thresholds as part of their Transportation Analysis Guidelines (City of San Marcos 2020). A project that meets at least one of the screening criteria established by the City in its transportation guidelines would be presumed to have a less than significant VMT impact due to project characteristics and/or location. A local serving school is screened out because it is a public facility that primarily serves the community and produces low VMT. Additionally, the proposed project includes improvements which would not increase student enrollment or school-related activities that are not already occurring at SMHS. As such, the project would screen out and VMT impacts can be presumed to be less than significant. Therefore, the proposed project would not conflict with Section CEQA Guidelines 15064.3 and impacts would be less than significant.

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)?

Less than Significant Impact. The project would not construct any new roadways or intersections or change the geometry of existing intersections near SMHS. Vehicular access to SMHS is from San Marcos Boulevard via the signalized intersection of Knights Realm and San Marcos Boulevard and a right-in only driveway

from San Marcos Boulevard. Parking is not allowed along San Marcos Boulevard and there is adequate sight distance at the main access driveway. Pedestrian and bike movements would not be modified by the proposed project. During construction and as a typical practice, the District would require the project contractor to follows best practices of delineating construction work and staging areas, using appropriate signage and maintaining on-site circulation. As such, nominal trips generated by construction activities for a short duration of time would not result in safety impacts to the roadways, during construction or operation of the project. The proposed project does not propose any incompatible uses. As such, the project would not increase hazards due to a design feature or incompatible uses and impacts would be less than significant.

d) Would the project result in inadequate emergency access?

Less than Significant Impact. Vehicular access to the project would be via the intersection of Knights Realm and San Marcos Boulevard and a right-in driveway from San Marcos Boulevard. During construction, the District would comply with all requirements for emergency access. Construction activities would occur on the project site and no lane closures in the public right-of-way are anticipated that would impact adopted emergency response plans. However, prior to commencing work, if needed, all applicable encroachment and/or traffic control permits would be obtained by the District or project's contractor to ensure that adequate emergency access is always maintained. As such, the proposed project would not result in inadequate emergency access and impact would be less than significant.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
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:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of 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.	☐	☒	☐	☐

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:

a) ***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)?***

Less than Significant Impact. As previously described in Section 3.5, Cultural Resources, above, the SMHS campus is not listed as a historical resource in either the National Register of Historic Places or by the California State Parks Office of Historic Preservation (NPS 2026; OHP 2026). The proposed project would not demolish any structures and would not otherwise affect any intact aged structures that could potentially meet the criteria listed above for historic resource eligibility. Because there are no known structures or features on the SMHS campus that would be considered "historically significant" and project components would not alter or otherwise affect a resource or feature eligible for historic resource listing (i.e., the scope of the project is generally limited to the install of field lights on an existing practice field and resurfacing of existing athletic fields), implementation of the proposed project would not impact tribal cultural resources pursuant to Public Resources Code Section 21074(a)(1).Thus, impacts to historical resources would be less than significant.

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

Less than Significant with Mitigation Incorporated. The District notified the Rincon Band of Luiseno Indians on February 6, 2026. The tribe responded asking for additional information in order to determine if AB 52 consultation would be needed. The tribe responded on February 6, 2026, requesting consultation. The District and the tribe consulted on February 9, 2026.

SMHS is not identified as historically significant in the California Register of Historic Resources or meets any of the criteria for listing in the National Register of Historic Places. The proposed project would require minimal ground-disturbing activities to install the lights and replace the field surfaces of the select on-campus athletic facilities at SMHS. As the campus has been previously developed and most ground-disturbing activities would occur within the artificial fill layer of the soil, construction activities of the project would not generally disturb native soils with potential to contain tribal cultural resources.

However and as stated above in Section 3.5, due to proposed depths proposed lighting pole excavation and foundation work could extend beyond previous disturbance (and layers of fill and sand identified in nearby geotechnical borings completed for the 2011 reconstruction and expansion project) associated with initial and more recent campus development. As such, the potential for encountering archaeological resources during lighting pole excavation work cannot be entirely avoided or discounted during this focus yet deeper depth excavation work. While the likelihood of discovering tribal cultural resources is anticipated to be generally limited to work associated with excavation for lighting pole foundations, the potential for discovering previously unidentified subsurface tribal cultural resources cannot be avoided entirely.

Therefore, Mitigation Measure (MM-) TCR-1 has been incorporated to reduce impacts to a less than significant level.

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

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

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

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

3.19 Utilities and Service Systems

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

a) ***Would the project require or result in the relocation or construction of new or expanded water, waste water 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 District is proposing improvements to select athletic facilities on the existing campus of SMHS. Specifically, the project would replace the existing synthetic turf, track, shot put areas, pole vault and long jump runways at the SMHS football stadium with new, comparable synthetic surfaces. Further, the existing natural turf multi-purpose field along the southern boundary of SMHS is proposed to be replaced with a synthetic turf field and shot put area (the installation of new, permanent, directional field lights [4] is also proposed). The proposed project would not increase the existing student capacity (improved athletic facilities would serve the existing student body) and would not generate additional water demand or wastewater. Accordingly, the campus demand for treated water and wastewater would not increase. The proposed project would not require the relocation or construction of

new or expanded water and wastewater treatment facilities and as such, impacts would be less than significant.

While the project proposes to replace an existing natural turf field with synthetic materials and would result in a minor increase in impervious surfaces on the SMHS campus (the new synthetic surface practice field would also feature a below grade drainage system to collect water and connect to the existing storm drain system on site), the majority of the campus and field surfaces would remain in their current state. Therefore, the amount of stormwater runoff would be similar to existing conditions. As implementation of the proposed project would not substantially increase the rate or amount of stormwater runoff at the SMHS campus, potential stormwater drainage impacts would be less than significant.

As previously stated, extension of existing electrical power serving the SMHS campus would be needed to operate the proposed practice field lights and other amenities. While activities on the practice field do not currently use field lights and electrical usage on the campus would increase due to the proposed near year-round use of the proposed field lights (see Section 2.3 for proposed seasonal usage), extension of existing electrical power/infrastructure to operate field lights on the SMHS campus would not in and of itself result in significant existing impacts. Potential impacts to aesthetics (nighttime views) and other environmental areas of interest associated with operation of field lights are examined throughout this document. As the proposed does not constitute major construction related to electrical infrastructure that could cause significant environmental effects, impacts would be less than significant.

While existing natural gas infrastructure is installed at the SMHS campus, construction and operation of the project would not be anticipated to require use of natural gas. As the proposed project would not require the construction of new or expanded natural gas facilities, no impact would occur.

The proposed project would not generate increased demand for telecommunication infrastructure. No off-site construction or relocation of utilities is proposed to implement the proposed athletic field improvements and as such, impacts would be less than significant.

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?

No Impact. Implementation of the project would neither directly, nor indirectly, result in an increase to the existing student capacity at SMHS and as such, the project would not generate additional water demand. No impact to existing water supplies would occur.

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

No Impact. Implementation of the project would neither directly, nor indirectly, result in an increase to the existing student capacity at SMHS and as such, the project would not generate additional wastewater treatment demand. No impact to existing wastewater treatment would occur following implementation of the project.

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 debris associated with the removal of existing field surfaces. General construction waste would also be generated during the proposed two-month construction timeframe. In accordance with CALGreen Construction Wate Management Requirements (specifically, Section 5.408.1.1 that requires that at least 65% of the nonhazardous construction and demolition waste from nonresidential construction activities be recycled and/or salvaged for reuse), the proposed project would ensure that at least 65% of applicable nonhazardous construction and demolition waste would be appropriately recycled or salvaged for reuse. Accordingly, construction of the project would not harm the attainment of solid waste reduction goals in the City of San Marcos. In addition, implementation of the project would neither directly, nor indirectly, result in an increase to the existing student capacity at SMHS and as such, the project would not result in additional solid waste generation. Therefore, impacts would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. The project is required to comply with federal, state, and local management and reduction statutes and regulations related to solid waste including CALGreen Construction Wate Management Requirements and AB 939 (the Integrated Waste Management Act) that promotes recycling and waste reduction at the city and county level of government. Construction and operational generation of solid waste associated with the project would not conflict with applicable recycling mandate or waste diversion requirements and as such, impacts would be less than significant.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The SMHS campus and immediate surrounding area is within a Local Responsibility Area and is not in a VHFHSZ (City of San Marcos 2012; CAL FIRE 2026) and the proposed project would not change the existing boundaries of the campus such that students or facilities would be placed closer to wildfires (or closer to a very high or high fire hazard severity zone). The proposed project would not increase student capacity or other school programs that would affect the existing emergency response plan or emergency evacuation plan. As such, impacts would be less than significant.

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

Less than Significant Impact. The SMHS campus and immediate surrounding area is within a Local Responsibility Area and is not in a VHFHSZ (City of San Marcos 2012; CAL FIRE 2026). Furthermore, the proposed work area/athletic fields are developed as athletic fields, are flat, and proposed construction and operation would not exacerbate wildfire risk. As the proposed project would not result in increased exposure to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, impacts would be less than significant.

c) 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 SMHS campus and immediate surrounding area is within a Local Responsibility Area and is not in a VHFHSZ (City of San Marcos 2012; CAL FIRE 2026). The SMHS campus is served by existing roads and utilities and installation of field lights and required electrical lines/utilities

would not substantially increase fire risk that may result in temporary or ongoing impacts to the environment. Impacts would be less than significant.

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. The SMHS campus and immediate surrounding area is within a Local Responsibility Area and is not in a VHFHSZ (City of San Marcos 2012; CAL FIRE 2026). The proposed work areas are flat, development would have minimal impact on existing drainage patterns and runoff, and the campus is not within a mapped flood area pursuant to General Plan Figure 6-3. FEMA Flood Hazards and Reservoir/Dan Inundation Areas (City of San Marcos 2012). The implementation of proposed athletic field improvements on the SMHS campus would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. The work areas are flat and have been previously developed. Furthermore, work areas would be developed in accordance with BMPs and thus, impacts would be less than significant.

3.21 Mandatory Findings of Significance

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

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

Less than Significant Impact with Mitigation Incorporated. As discussed in Section 3.5, Cultural Resources, Section 3.7, Geology and Soils, and Section 3.18, Tribal Cultural Resources, implementation of Mitigation Measure AES-1, Mitigation Measure CUL-1, Mitigation Measure GEO-1, and Mitigation Measure TCR-1 would reduce impacts to light spill, cultural, paleontological, and tribal cultural resources, respectively, to less than significant. Therefore, impacts to quality of the environment, wildlife species, and California history or prehistory would be less than significant upon implementation of mitigation measures.

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

Less than Significant Impact. A cumulative impact could occur if the proposed project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. Because the proposed project would accommodate existing sports programs and practices within the District's (and SMHS) boundaries, construction would be short-term and activities would generally impact areas that have been subject to past disturbance associated with initial campus development and more recent reconstruction and expansion, and the proposed project would not increase SMHS capacity, impacts would not be cumulatively considerable. Therefore, impacts would be less than significant.

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

Less than Significant Impact. As discussed throughout this environmental document, the proposed project would comply with applicable local, state, and federal laws governing general welfare and environmental protection. Therefore, impacts of the proposed project on human beings, directly or indirectly, would be less than significant with mitigation incorporated.

4 References and Preparers

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4.2 List of Preparers

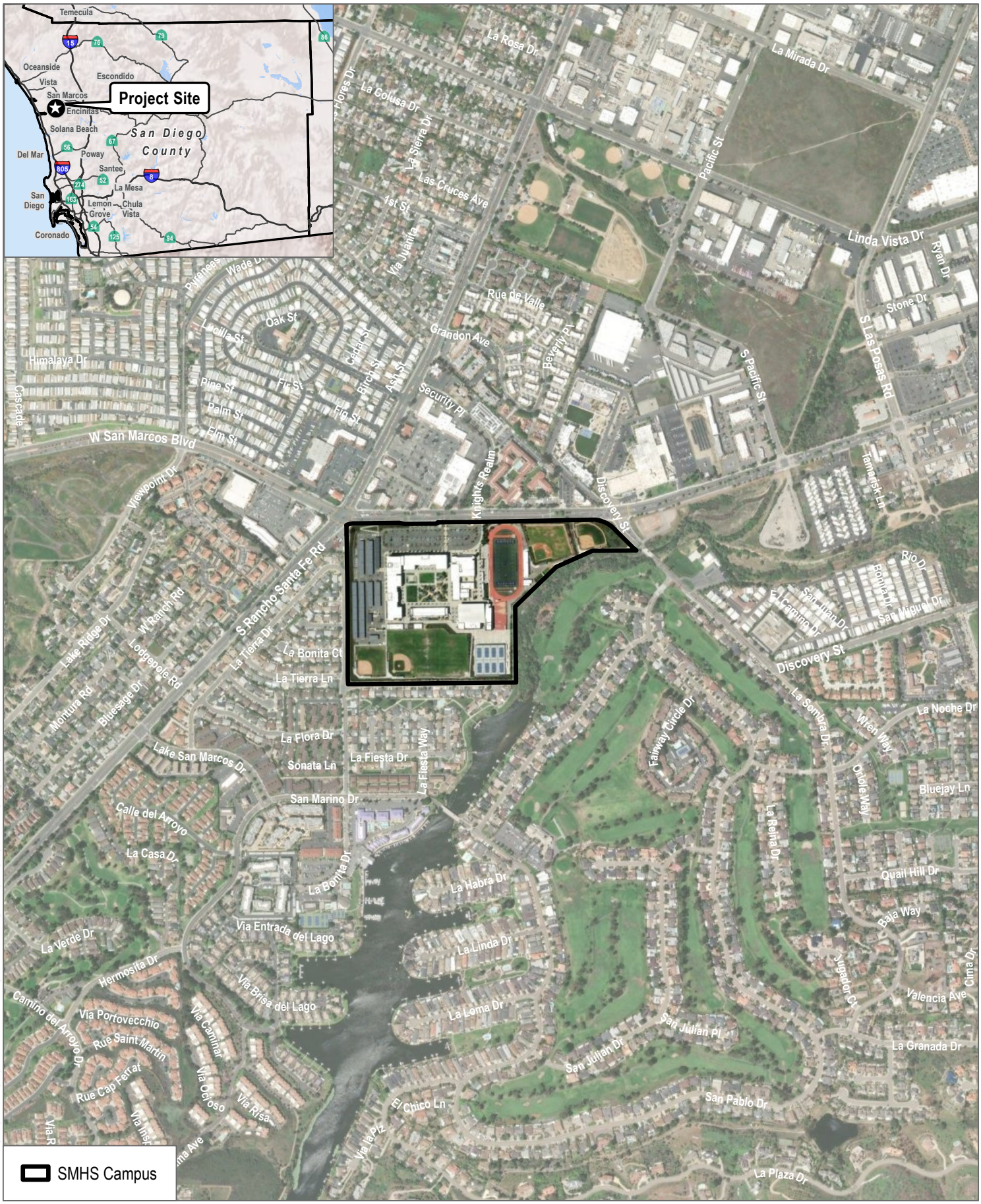
San Marcos Unified School District

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Diane DeBruyn, Accounting Technician
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Sabita Tewani, AICP, PTP, Senior Transportation Planner
Michael Williams, Paleontologist
Sarah Siren, Paleontologist
Jordan Conway, Geospatial Analyst

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SOURCE: USGS National Map 2026, Open Street Maps 2019

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0 500 1,000 Feet

FIGURE 1

Project Location

San Marcos High School Sitewide Athletic Improvements Project

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SOURCE: San Marcos City 2026, Open Street Maps 2019

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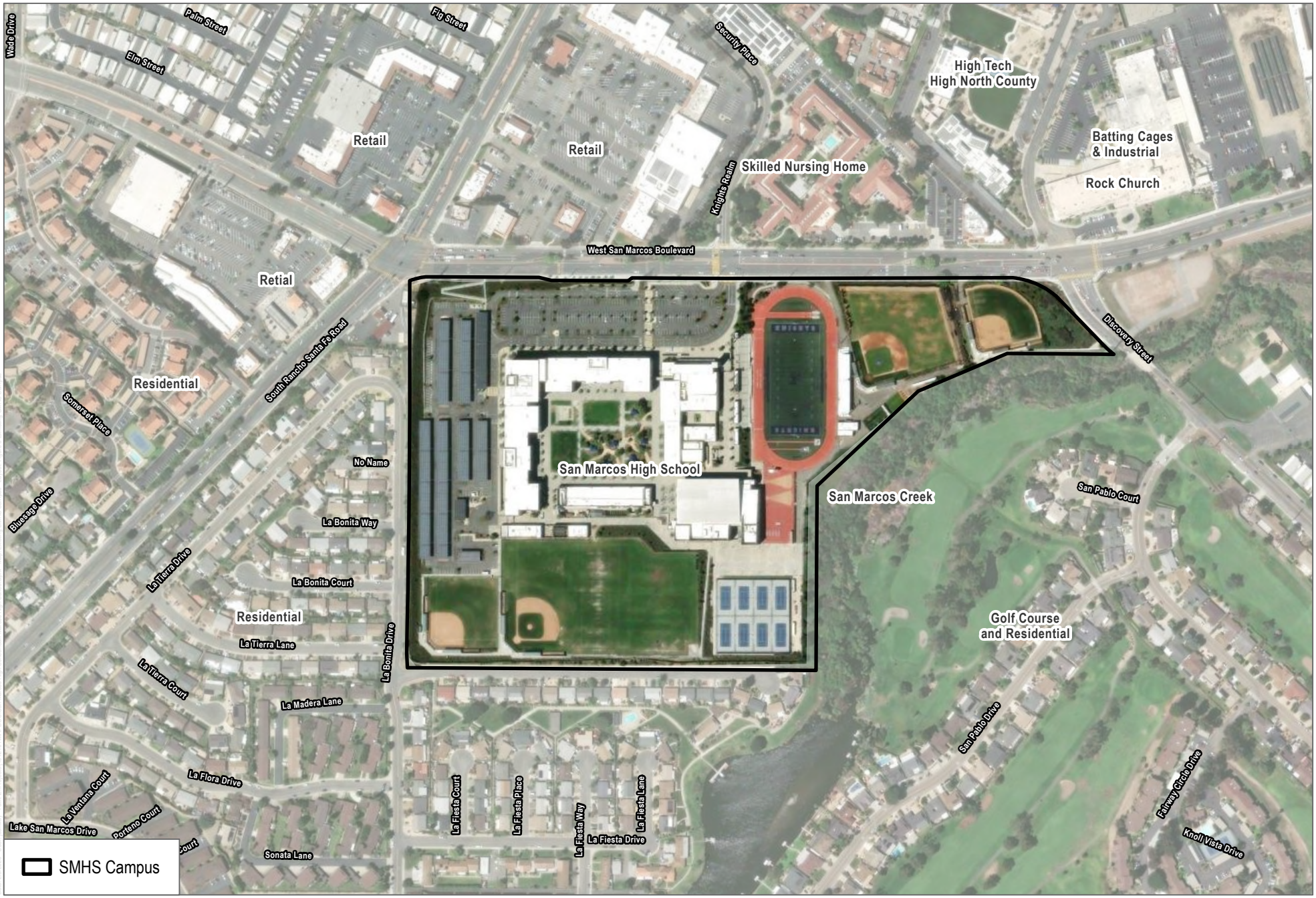
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FIGURE 2

General Plan Land Use and Zoning

San Marcos High School Sitewide Athletic Improvements Project

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SOURCE: ESRI 2026, SANDAG 2024, Open Street Maps 2019

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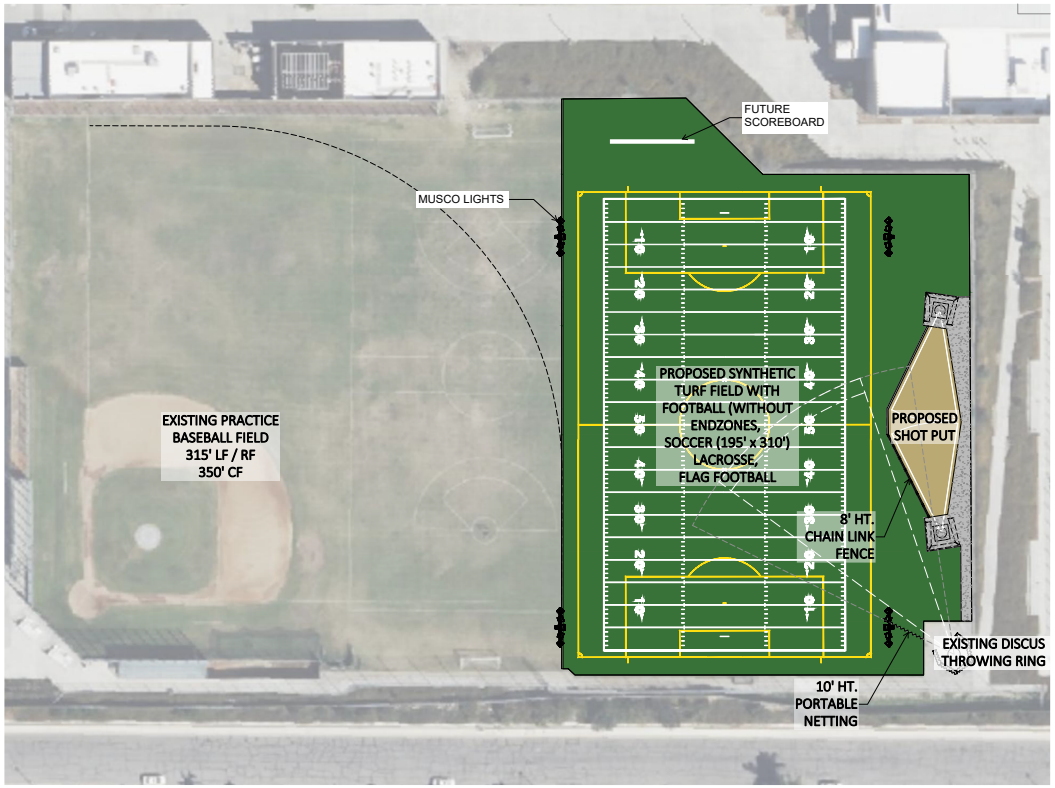
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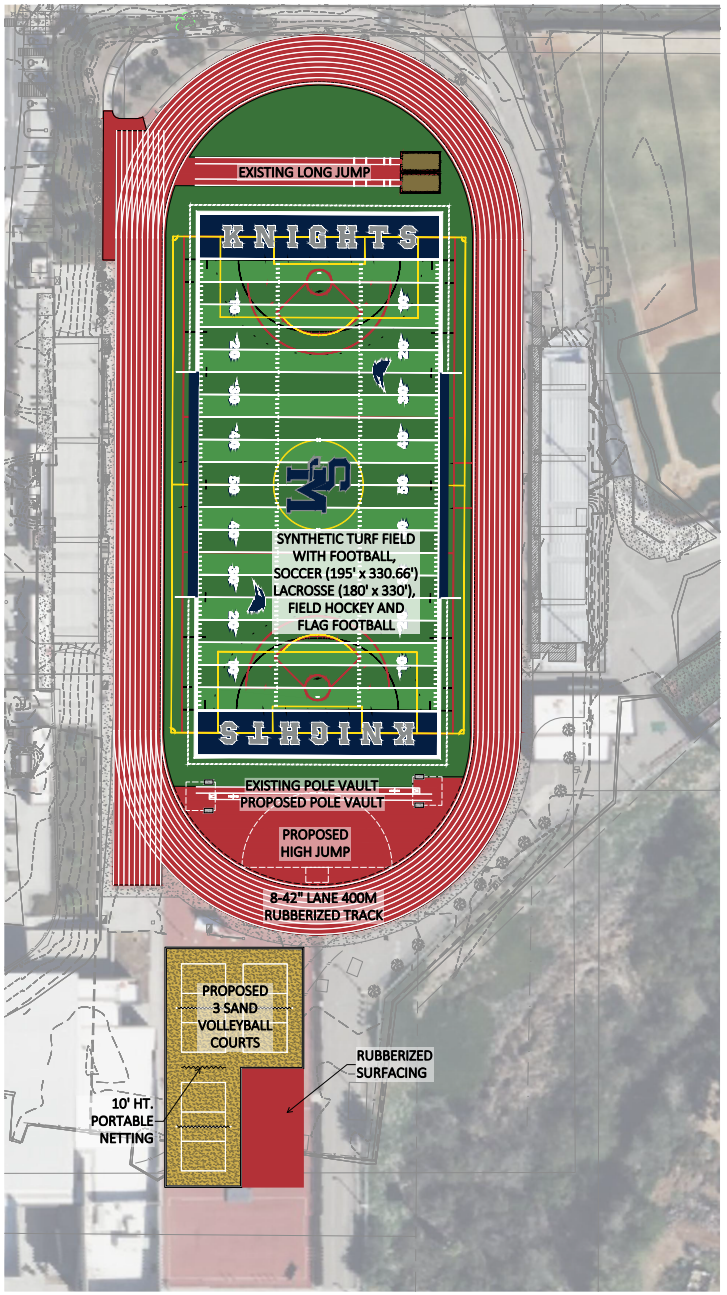
FIGURE 3

Existing SMHS Campus

San Marcos High School Sitewide Athletic Improvements Project

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SOURCE: Dudek 2026

FIGURE 4

Conceptual Layout Plan

San Marcos High School Sitewide Athletic Improvements Project

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Equipment List For Areas Shown

Structure				Fixtures				
QTY	STRUCTURE ID	SIZE	GRADE ELEVATION	ABOVE FIELD LEVEL	FIXTURE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
4	F1-F4	70'	-	70'	TLC-LED-1200	2	2	0
				70'	TLC-LED-1500	3	3	0
4	Totals					20	20	0

Above Field Level is height of fixtures above area shown



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

San Marcos High School Athletic Fields LED

San Marcos,CA

Grid Summary

Name:	Project Spill @ 3ft.
Spacing:	30.0'
Height:	3.0' above grade

Illumination Summary

INITIAL HORIZONTAL FOOTCANDLES

	Entire Grid
Scan Average:	0.1024
Maximum:	0.55
Minimum:	0.00
CU:	0.00
No. of Points:	39
FIXTURE INFORMATION	
Applied Circuits:	A
No. of Fixtures:	20
Total Load:	26.28 kW

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

Field Measurements: Individual field measurements may vary from computer-calculated predictions.

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

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

Path: Z:\Projects\19\42101\MAP\OC

SOURCE: Musco 2025

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FIGURE 5

Horizontal Spill Light Levels

San Marcos High School Sitewide Athletic Improvements Project

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Equipment List For Areas Shown

Structure				Fixtures				
QTY	STRUCTURE ID	SIZE	GRADE ELEVATION	ABOVE FIELD LEVEL	FIXTURE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
4	F1-F4	70'	-	70'	TLC-LED-1200	2	2	0
				70'	TLC-LED-1500	3	3	0
4	Totals					20	20	0

Above Field Level is height of fixtures above area shown



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

San Marcos High School Athletic Fields LED

San Marcos,CA

Grid Summary

Name:	**Project Spill @ 5ft.**
Spacing:	30.0'
Height:	5.0' above grade

Illumination Summary

INITIAL MAX VERTICAL FOOTCANDLES

	Entire Grid
Scan Average:	**0.1680**
Maximum:	0.93
Minimum:	0.00
CU:	0.00
No. of Points:	39
FIXTURE INFORMATION	
Applied Circuits:	A
No. of Fixtures:	**20**
Total Load:	26.28 kW

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

Field Measurements: Individual field measurements may vary from computer-calculated predictions.

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

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

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SOURCE: Musco 2025

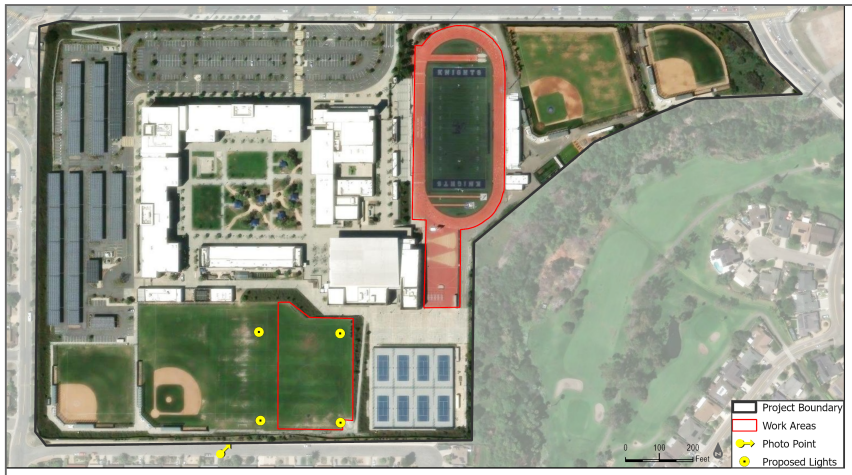
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FIGURE 6

Vertical Spill Light Levels

San Marcos High School Sitewide Athletic Improvements Project

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Existing Conditions



Proposed Conditions

SOURCE: Dudek 2026

FIGURE 7

Visual Simulation: Practice Field Lighting from La Casita Drive (Looking East)

San Marcos High School Sitewide Athletic Improvements Project

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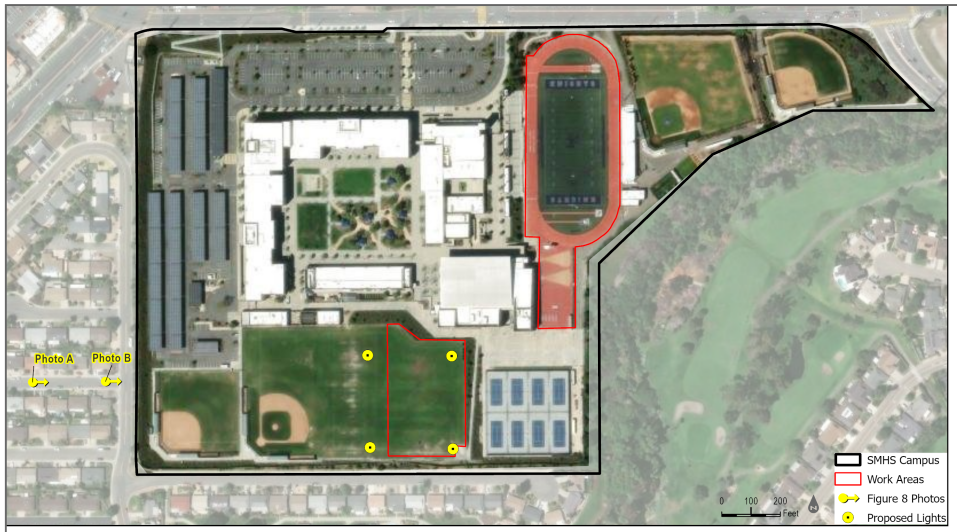




Photo A



Photo B

SOURCE: Dudek 2026

FIGURE 8

Existing Conditions: La Bonita Court (Looking East)

San Marcos High School Sitewide Athletic Improvements Project

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SOURCE: ESRI 2026, Open Street Maps 2019

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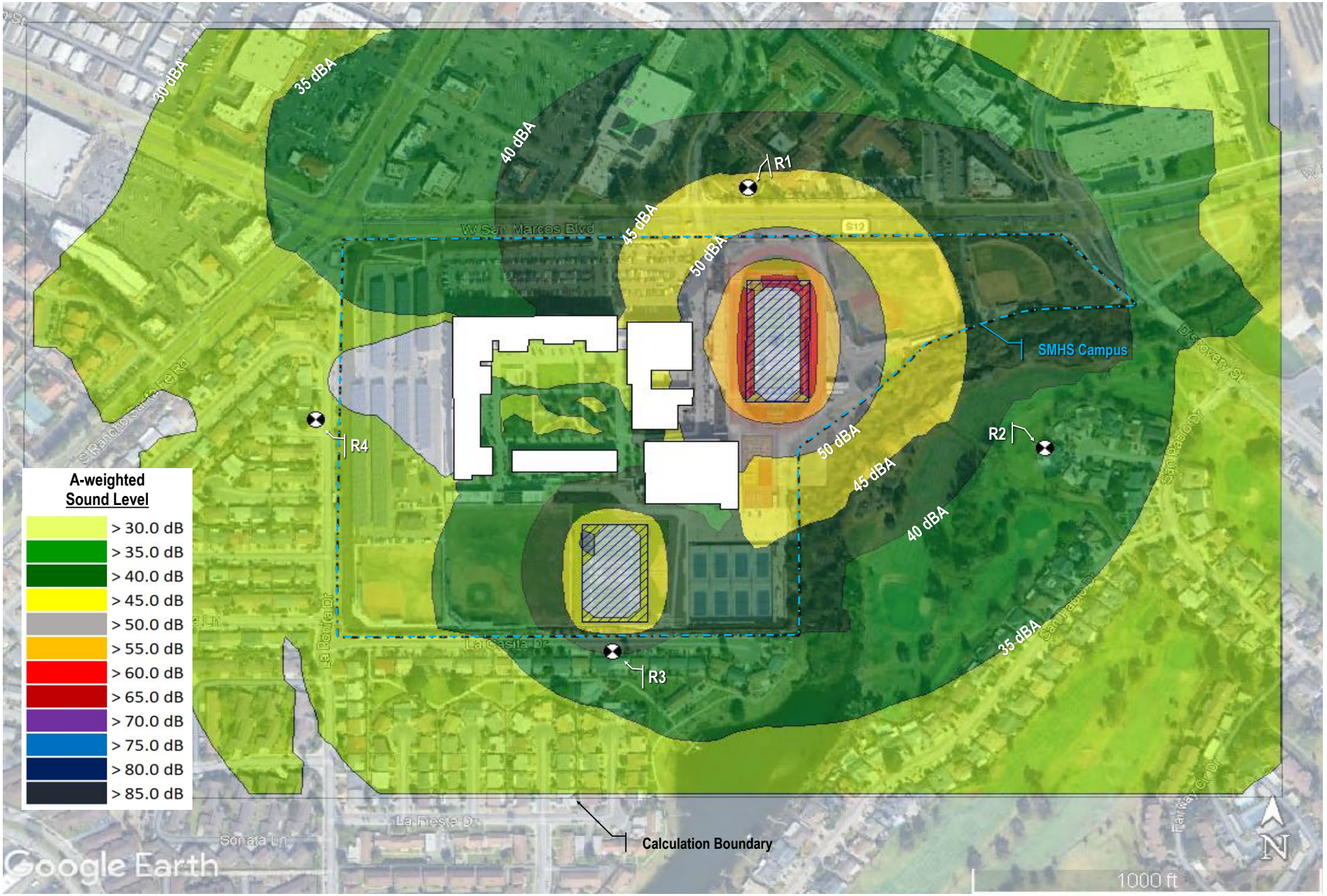
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FIGURE 9

Baseline Outdoor Ambient Sound Level Measurements

San Marcos High School Sitewide Athletic Improvements Project

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SOURCES: Google 2026; Dudek 2026

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0 167 334 Feet

FIGURE 10

Predicted Stationary Source Operation Noise from Proposed Project

San Marcos High School Sitewide Athletic Improvements Project

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