June 2021 | Focused Final Environmental Impact Report
State Clearinghouse No. 2020029070

DEL MAR HEIGHTS SCHOOL REBUILD FOCUSED FINAL ENVIRONMENTAL IMPACT REPORT

CEQA FINDINGS OF FACT REGARDING THE FOCUSED FINAL ENVIRONMENTAL IMPACT REPORT

for Del Mar Union School District

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I. INTRODUCTION

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. This document provides the findings required by CEQA.

The project was analyzed in an Initial Study/Mitigated Negative Declaration, which was released for a 30-day public review period, which began February 20, 2020, and closed on March 30, 2020. All issues analyzed in the Initial Study/Mitigated Negative Declaration were found to be less than significant, or less than significant with mitigation incorporated. On May 12, 2020, the District adopted a Mitigated Negative Declaration and approved the project.

The approvals were challenged (Save the Field v. Del Mar Union School District, Case No. 37-2020-00020207-CU-TT-CTL) and the court ruled that three issues required further assessment: 1) Assess the potential impact to Southern Maritime Chapparal habitat and any endangered plant species caused by proposed modification to stormwater outfall pipes, 2) Assess the potential impact of construction noise on adjacent residential sensitive receptors; 3) Assess the potential impact caused by the proposed new stairs and ADA ramp at the southern tip of the campus.

The third issue of potential traffic impacts caused by the proposed new stairs and ADA ramp was resolved by the Board's removal of these components from the project at its meeting on January 19, 2021. At its meeting on February 24, 2021, the Board vacated the findings on the biological resources and construction noise cited above, vacated the approval of the project, and directed staff to reevaluate the biological and construction noise impacts and recirculate this analysis in a Focused Environmental Impact Report.

A Focused Draft Environmental Impact Report was prepared to address potential impacts on the two issues identified above: 1) Southern Maritime Chapparal habitat and any endangered plant species caused by proposed modification to stormwater outfall pipes, and 2) construction noise on adjacent residential sensitive receptors. The Focused Draft EIR was circulated for a 45-day public review between April 28, 2021 and June 11, 2021. A Focused Final EIR was prepared that contains comments received on the Focused Draft EIR, responses to the individual comments, revisions to the Focused Draft EIR including any clarifications based on the comments and the responses to the comments.

This document provides the findings required by CEQA for approval of the proposed project.

A. Statutory Requirements for Findings

The CEQA (Pub. Res. Code §§ 21000, *et seq.*) and the State CEQA Guidelines (Guidelines) (14 Ca. Code Regs §§ 15000, *et seq.*) promulgated thereunder, require the environmental impacts of a project be examined before a project is approved. Specifically, regarding findings, Guidelines Section 15091 provides:

> (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
>
> 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
>
> 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
>
> 3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.
>
> (b) The findings required by subsection (a) shall be supported by substantial evidence in the record.
>
> (c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.
>
> (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
>
> (e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The "changes or alterations" referred to in Section 15091(a)(1) above, that are required in, or incorporated into, the project which mitigate or avoid the significant environmental effects of the project, may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.

(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

(e) Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.

Regarding a Statement of Overriding Considerations, Guidelines Section 15093 provides:

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

B. Certification

Having received, reviewed, and considered the EIR for the Del Mar Heights School Rebuild Project State Clearinghouse No. 2020029070, as well as other information in the record of proceedings on this matter, the Del Mar Union School District Board of Trustees (Board of Trustees) adopts the following Findings, in its capacity as the legislative body for the Del Mar Union School District (District), which is the CEQA Lead Agency. The Findings set forth the environmental and other bases for current and subsequent discretionary actions to be undertaken by the District and responsible agencies for the implementation of the proposed project.

In addition, the Board of Trustees hereby make findings pursuant to and in accordance with Section 21081 of the California Public Resources Code and State CEQA Guidelines Sections 15090 and 15091 and hereby certifies that:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the final EIR.

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

C. Project Environmental Report and Discretionary Actions

The Focused Final EIR addresses the direct, indirect, and cumulative environmental effects of construction and operation activities associated with the proposed project. The Focused Final EIR provides the environmental information necessary for the District to make a final decision on the requested discretionary actions for all phases of this project. The Focused Final EIR was also intended to support discretionary reviews and decisions by other responsible agencies. Discretionary actions to be considered by the District may include, but are not limited to, the following:

- Certify that the Focused Final EIR for the proposed project has been completed in compliance with CEQA, and reflects the independent judgement and analysis of the District; find that the Board of Trustees has reviewed and considered the information contained in the Focused Final EIR prior to approving the project; adopt the Mitigation Monitoring and Reporting Program, finding that the Mitigation Monitoring and Reporting Program is adequately designed to ensure compliance with the mitigation measures during project implementation; and determine that the significant adverse effects of the project either have been reduced to an acceptable level, or are outweighed by the specific overriding considerations of the project as outlined in the CEQA Findings of Fact, as set forth herein.

- Approve the proposed project and related discretionary actions needed for project construction and operation.

II. PROCEDURAL COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT

The District published a Draft EIR on April 28, 2021. A Focused Final EIR was prepared in June 2021 in compliance with CEQA requirements. The Focused Final EIR has been prepared in accordance with CEQA and the CEQA Guidelines, as amended. As authorized in State CEQA Guidelines Section 15084(d)(2), the District retained a consultant to assist with the preparation of the environmental documents. District staff from multiple departments, representing the Lead Agency, have directed, reviewed, and modified where appropriate all material prepared by the consultant. The Focused Final EIR reflects the District's independent analysis and judgement. The key milestones associated with the preparation of the Focused EIR are summarized below. As presented below, an extensive public involvement and agency notification effort was conducted to solicit input on the scope and content of the Focused EIR and to solicit comments on the results of the environmental analysis presented in the Focused Draft EIR.

A. Public Notification and Outreach

In conformance with CEQA, the State CEQA Guidelines, the District conducted an extensive environmental review of the proposed project.

- Completion of a Notice of Intent (NOI) on February 20, 2020 for the Initial Study/Mitigated Negative Declaration. The public review period extended from February 20, 2020 to March 30, 2020. The NOI was posted on the District website, at Del Mar Heights School and at the District office on February 20, 2020. The NOI was posted at the San Diego County Clerk's office on February 20, 2020. Copies of the NOI were mailed to interested persons and organizations.

The Focused Draft EIR was made available for a 45-day public review period beginning April 28, 2021 and ending June 11, 2021. The scope of the Focused Draft EIR was determined based on the court ruling (Save the Field v. Del Mar Union School District, Case No. 37-2020-00020207-CU-TT-CTL), where the court ruled that three issues required further assessment: 1) Assess the potential impact to Southern Maritime Chapparal habitat and any endangered plant species caused by proposed modification to stormwater outfall pipes, 2) Assess the potential impact of construction noise on adjacent residential sensitive receptors; 3) Assess the potential impact caused by the proposed new stairs and ADA ramp at the southern tip of the campus. The Notice of Availability (NOA) for the Draft EIR was sent to interested persons and organizations, sent to the State Clearinghouse in Sacramento for distribution to state agencies, and posted at the District's website. The Notice of Availability of the Draft EIR was published in The Daily Transcript on April 28, 2021. The 45-day public review period ran from April 28, 2021 to June 11, 2021.

- Preparation of a Focused Final EIR, including the responses to comments to the Focused Draft EIR, was released on June 18, 2021 for a 10-day agency review period prior to certification of the Final EIR.

In summary, the District conducted all required noticing and scoping for the proposed project in accordance with Section 15083 of the CEQA Guidelines, and conducted the public review for the Focused EIR, which exceeded the requirements of Section 15087 of the CEQA Guidelines.

B. Focused Final Environmental Impact Report and Board of Trustees Proceedings

The District prepared a Final Focused EIR, including Responses to Comments to the Focused Draft EIR. The Focused Final EIR/Response to Comments contains comments on the Focused Draft EIR, responses to those comments, revisions to the Draft EIR, and appended documents. Comments were received from two public agencies and 54 individuals.

None of the comment letters resulted in the need to change the conclusions of the environmental analysis in the Focused Draft EIR.

The Focused Final EIR found that prior to mitigation, implementation of the proposed project will result in potentially significant impacts to Noise, as stated below. However, with the implementation of mitigation measures, impacts would be less than significant.

The public can view searchable agendas for scheduled Board of Trustees meetings and access agenda-related District information and services directly on the following website: https://www.dmusd.org.

The Focused Final EIR document will be posted for viewing and download with the previously posted Focused Draft EIR prior to the District's consideration of the Focused Final EIR and project recommendations on the District's website.

June 30, 2021 has been set for consideration of the Focused Final EIR and the project by the Board of Trustees. Notice of the meeting was provided consistent with the Brown Act (Government Code Sections 54950 et seq.). The Board of Trustees will take public comments on the proposed project, decide whether to certify the EIR, approve the project, approve a Statement of Facts and Finding, approve the Mitigation Monitoring and Reporting Program and approve filing of a Notice of Determination.

C. Record of Proceedings

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project consists of the following documents and other evidence, at a minimum:

- The NOI, NOA, and all other public notices issued by the District in conjunction with the proposed project.
- The Focused Draft EIR and Focused Final EIR for the proposed project.
- All written comments submitted by agencies or members of the public during the public review comment period on the Focused Draft EIR.
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the Focused Draft EIR.
- The Mitigation Monitoring and Reporting Program.
- The reports and technical memoranda included or referenced in the Focused Final EIR.

- All documents, studies, EIRs, or other materials incorporated by reference in the Focused Draft EIR and Focused Final EIR.

- The Initial Study/Mitigated Negative Declaration (February 2020) and the Responses to Comment on the MND (May 2020)

- The Resolutions adopted by the District in connection with the proposed project, and all documents incorporated by reference therein, including comments received after the close of the comment period and responses thereto.

- Matters of common knowledge to the District, including but not limited to federal, state, and local laws and regulations.

- Any documents expressly cited in these Findings.

- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e).

D. Custodian and Location of Records

The documents and other materials that constitute the administrative record for the District's actions related to the proposed project are at the Del Mar Union School District – Capital Programs and Technology, 11232 El Camino Real, San Diego, California 92130. The District's Capital Programs and Technology Department is the custodian of the administrative record for the proposed project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request of the Capital Programs and Technology Department. Additionally, the documents are available online under the Measure MM on the District's website at: https://www.dmusd.org. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

E. Project Location

The approximately 10.85-acre project site encompasses the Del Mar Heights School property at 13555 Boquita Drive in the City of San Diego. The project site consists of Assessor's Parcel Number (APN) 301-0500-700 and is in Del Mar Heights, a 760-lot subdivision in the Torrey Pines community. The project site is surrounded by Boquita Drive to the north, Mira Montana Drive to the east, and open space canyonlands to the south and west of the project site. The subdivision of Del Mar Heights in the City of San Diego is surrounded by the City of Del Mar to the west and the City of San Diego to the north, east, and south, and is approximately 0.30-mile west of Interstate 5 (I-5). The project site is southeast of Canyon Crest Open Space Park, east and north of Torrey Pines State Natural Reserve, and the City of San Diego's Multi-Habitat Planning Area (MHPA) is to the west and south of the site.

F. Project Objectives

Objectives for the Del Mar Heights School Rebuild project will aid decision makers in their review of the project and associated environmental impacts:

1. Modernize and renovate the campus to address issues identified in the Facilities Master Plan.

2. Provide a safe and up-to-date campus to enhance and facilitate students' learning environment.

3. Improve circulation and reduce offsite congestion by increasing onsite parking and drop-off/pick-up zones.

4. Provide the general public with updated recreational amenities, including an amphitheater, stand-alone green spaces, and a decomposed granite path.

G. Project Description

Del Mar Union School District plans to fully redesign and reconstruct the Del Mar Heights School. The capacity will be reduced by one classroom (approximately 24 students) from the existing 22 regular classrooms to 21 regular classrooms, buildings will be limited to one story with low slope roofs, and access to the school will remain via Boquita Drive. The District plans to seek matching state funds, which will trigger the need for California Department of Education and Department of Toxic Substances Control approvals in addition to the CEQA process. Construction of the proposed project would occur over an approximately 8.4-acre area.

III. CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS

A. Format

Section 15091 of the CEQA Guidelines requires that a Lead Agency make a finding for each significant effect for the project. This section summarizes the significant environmental impacts of the proposed project, describes how these impacts are to be mitigated, and discusses various alternatives to the proposed project, which were developed to reduce the remaining significant environmental impacts. All impacts are considered potentially significant prior to mitigation unless otherwise stated in the findings.

This remainder of this section is divided into the following subsections:

Section B, Findings on "No Impact" and "Less Than Significant Impacts," presents environmental issues, as identified in Chapter 5 of the Focused Draft EIR, which would result in no impact or less than significant impacts.

Section C, Findings on Impacts Mitigated to Less Than Significant, presents significant impacts of the proposed project that were identified in Chapter 5 of the Focused Draft EIR, the mitigation measures identified in the Mitigation Monitoring Program, and the rationales for the findings.

Section IV, Alternatives to the Proposed Project, presents alternatives to the proposed project and evaluates them in relation to the findings set forth in Section 15091(a)(3) of the State CEQA Guidelines, which allows a public agency to approve a project that would result in one or more significant environmental effects if the project alternatives are found to be infeasible because of specific economic, social, or other considerations.

Section V, Statement of Overriding Considerations, indicates that there are no significant and unavoidable impacts of the proposed project, and therefore, a Statement of Overriding Considerations is not warranted.

Section VI, Findings on Responses to Comments on the Focused Draft EIR and Revisions to the Focused Final EIR, presents the District's findings on the response to comments and revisions to Focused Final EIR, and decision on whether a recirculated Focused Draft EIR is necessary.

B. Findings on "No Impact" and "Less Than Significant Impacts"

The District determined that the proposed project would have no impact or less than significant impacts, including direct, indirect, and cumulative impacts, for the environmental issues summarized below. The rationale for the conclusion that no significant impact would occur in each of the issue areas is based on the environmental evaluation in the listed topical EIR sections in Chapter 5 of the Focused Draft EIR.

CEQA Guidelines Section 15901 states that an EIR may not be certified for a project that has one or more significant environmental effects unless one of three possible findings is made for each significance effect. Since the following environmental issue areas were determined to have no impact or a less than significant impact, no findings for these issues are required.

Biological Resources

Impact 5.1-1: Development of the proposed project would not impact the sensitive southern maritime chaparral, Torrey pine, wart-stemmed ceanothus, Nutshell's scrub oak, Del Mar manzanita, and short-leaved dudleya. [Threshold B-1]

The project would directly impact less than 0.01 acre of sensitive southern maritime chaparral during repair of the southern outfall. This impact would be temporary and would be below the level of significance. Additionally, impacts from Brush Management Zones 1 and 2 would not result in significant impacts to sensitive biological resources.

No special status plant or animal species occur or are expected to occur within the project impact footprint. As such, there would be no significant impact to special status plant or animal species. Finally, the project would comply with applicable MBTA and California Fish and Game Code avian nesting season restrictions; therefore, there would be no significant nesting bird impacts.

With the inclusion of the proposed project's design features to avoid impacts to biological resources, such as no lighting adjacent to the MHPA and the planting of native vegetation at the outfalls to improve slope stability, impacts would be less than significant, and no mitigation measures are required.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact relating to biological resources. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

C. Findings on Significant Environmental Impacts that can be reduced to a Less Than Significant Level

The following summary describes impacts of the proposed project that, without mitigation, would result in significant adverse impacts. Upon implementation of the mitigation measures provided in the Focused Draft EIR, these impacts would be considered less than significant.

Noise

Impact 5.2-1: Construction activities would result in temporary noise increases in the vicinity of the proposed project. [Threshold N-1]

Construction Vehicles

The transport of workers and materials to and from the construction site would increase noise levels along site access roadways. Individual vehicles may create momentary noise of up to 85 dBA L_{max} at 50 feet; however, these occurrences would be infrequent and short-lived.

Worker and vendor trips would total a maximum of 283 daily trips during the overlapping activity phases of building construction, paving, and architectural coating. The student trips would be eliminated during construction, and worker and vendor trips would be less than existing trips associated with students (student enrollment at Del Mar Heights School for the 2018-2019 academic year was 495). Impacts would be less than significant.

Construction Equipment

Noise levels from project-related construction activities were conservatively calculated from the point or multiple points closest to nearby sensitive receptors and compared with the significance threshold of 75 dBA $Le_{q(12\text{-}hr)}$ at the sensitive receptor property line. Building and asphalt demolition was modeled conservatively assuming that building demolition at four of the closest points to sensitive receptors could occur at the same times as asphalt demolition, and noise levels could reach up to 91.2 dBA L_{eq} at Receptor 2, which would exceed the threshold of 75 dBA L_{eq} (see Figure 5.2-3, *Building and Asphalt Demolition Noise Contours [Unmitigated],* of the Focused Draft EIR).

Soil nailing at the base of the embankment to the east is proposed, and modeling assumed that soil nailing would occur at the same times as grading activity. Both activities were conservatively modeled at points closest to residences to the east (see Figures 5.2-4 through 5.2-7 of the Focused Draft EIR). During soil nailing and grading, construction noise levels could reach up to 78.2 dBA Leq at Receptor 18, which would exceed the threshold of 75 dBA Leq. An additional model run for grading was conducted at the south end of the construction site (see Figure 5.2-8, *Grading South Noise Contours [Unmitigated]* of the Focused Draft EIR), and construction noise levels could reach up to 77.8 dBA Leq at Receptor 20, which would exceed the threshold of 75 dBA Leq. During building construction (see Figure 5.2-9, *Building Construction Noise Contours [Unmitigated]* of the Focused Draft EIR), which was conservatively modeled assuming the simultaneous construction of four of the closest buildings to receptors, construction noise levels could reach up to 76.1 dBA Leq at Receptor 16, which would exceed the threshold of 75 dBA Leq. During paving activity (see Figure 5.2-10, *Paving Noise Contours [Unmitigated]* of the Focused Draft EIR), which was conservatively modeled at four simultaneous points closest to nearby receptors, construction noise levels could reach up to 72.7 dBA Leq at Receptor 3, which would not exceed the threshold of 75 dBA Leq. The construction noise modeling indicates that project construction has the potential to exceed the significance threshold of 75 dBA Leq. Therefore, this impact would be potentially significant.

Torrey Pines Extension State Park

The state park is adjacent to Del Mar Heights school property to the west and south. Users of Gully Trail would only be near the construction site for a relatively short time since there is no common outdoor use area, and hikers, for example, would not remain stationary. In addition, the City's CEQA Significance Determination Thresholds specifically apply to "property zoned residential" and "where temporary construction noise would substantially interfere with normal business communications, or affect sensitive receptors, such as day care facilities." Because the Torrey Pines Extension State Park is neither and users of the Gully Trail would not be exposed to excessive construction noise for a substantial period, this would be a less-than-significant impact.

Mitigation Measure:

The following mitigation measure was included in the Focused Draft EIR and the Focused Final EIR and are applicable to the proposed project.

N-1 The District shall incorporate the following practices into the construction documents to be implemented by the construction contractor during the entire construction phase of the project:

- The project sponsor and contractors shall prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan shall be included as part of the construction drawing set.
- At least 30 days prior to the start of construction activities, all off-site residents within 300 feet of the project site shall be notified of the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification shall include the telephone numbers of the District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint.
- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the District.
- During the entire active construction period, equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible.
- Require the contractor to use impact tools (e.g., jack hammers and hoe rams) that are hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- During the entire active construction period, stationary noise sources shall be located as far from sensitive receptors as possible, and they shall be muffled and

enclosed within temporary sheds, or insulation barriers or other measures shall be incorporated to the extent feasible.

- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.
- During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
- Temporary noise barriers will be constructed with solid material with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the temporary noise barrier and be lined on the construction side with an acoustical blanket, curtain, or equivalent absorptive material. The locations and heights (8 to 16 feet) of temporary noise barriers are shown in Figure 5.2-11. The District shall verify compliance with this measure prior to the start of major demolition or construction work. Temporary Noise Barrier 1 shall remain up during the building and asphalt demolition phase and the soil nailing and grading phase but will need to be removed during the building construction phase. Temporary Noise Barrier 2 shall remain up for the entire duration of demolition and construction. Temporary Noise Barrier 3 shall remain up for at least the duration of the building and asphalt demolition phase.

Finding:

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the Focused Draft EIR. These changes are identified in the form of the mitigation measure above. The District hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

Rationale for Finding

Mitigation Measure N-1 would incorporate practices into the construction documents which would reduce noise impacts and therefore result in a less than significant impact.

Impact 5.2-2: Construction activities could create excessive short-term groundborne vibration. [Threshold N-2]

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

As shown in Table 5.2-5, *Vibration Levels for Typical Construction Equipment,* of the Focused Draft EIR, typical construction equipment can generate vibration levels up to 0.21 in/sec PPV at 25 feet. Paving and grading activities could potentially occur at a distance of 15 feet from residential structures to the

north during the proposed parking lot expansion. These activities could include construction equipment such as vibratory rollers. Table 5.2-5 shows that vibration levels could exceed 0.2 in/sec PPV at 25 feet or less with use of a vibratory roller, resulting in a potentially significant impact.

Mitigation Measure:

The following mitigation measure was included in the Focused Draft EIR and the Focused Final EIR and are applicable to the proposed project.

N-2 If paving activity during construction is required within 25 feet of nearby residential structures, a static roller shall be used instead of a vibratory roller.

Finding:

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the Focused Draft EIR. These changes are identified in the form of the mitigation measure above. The District hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

Rationale for Finding

The use of a static roller through implementation of Mitigation Measure N-2 is predicted to generate vibration levels of approximately 0.11 in/sec PPV at a distance of 15 feet, which would not exceed the 0.2 in/sec PPV threshold, therefore reducing impacts to less than significant.

Impact: Impact caused by the new stairs and ADA ramp at the southern tip of the campus.

The proposed project would not increase student capacity at Del Mar Heights School and there would be no additional traffic as a result of the project. The expanded student loading zone and expanded parking lot area will reduce congestion in the neighborhood by moving the queue onto the campus. However, neighbors along Mira Montana Drive maintain that improving access to the campus via stairs and ADA ramp would cause additional traffic by making such access more convenient.

Finding

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as explained in the Focused Draft EIR. The Board of Trustees removed the stairs and ADA ramp, which were the reason for concern over possible increased traffic on Mira Montana Drive.

Rationale for Finding

Removal of the stairs and ADA ramp eliminates any potential that improved pedestrian access between Mira Montana Drive and the southern tip of the campus would encourage parents to drop-off or pick-up students at that location and increase traffic on Mira Montana Drive as a result.

D. Alternatives Considered and Rejected During the Scoping/Project Planning Process

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in the Focused Draft EIR.

1. Alternative Site

The project by design is intended for the Del Mar Heights School campus. Consequently, an alternative off-site location is not a feasible alternative and would not meet the project objectives. Because the project site is already developed as a school, constructing a new school on a different site would likely increase environmental impacts. For these reasons, this alternative was not considered.

2. Stormwater Conveyance Alternatives

There is no significant biological impact associated with repairing and revegetating the two stormwater outflows, as analyzed in Section 5.1 of the Focused Draft EIR. While there is no requirement to consider an alternative where there is no significant biological impact, various alternative ways to convey stormwater offsite, were explored as described below.

Relocation of Outfalls Alternative: If the biological resource survey had identified endangered plants or other sensitive resources and an impact was identified, an alternative might be to relocate the outfalls to a less sensitive location along the slope. However, other areas of the slopes, except for the existing outfalls, are vegetated and undisturbed, and therefore have more biological value than the existing disturbed outfalls. Therefore, moving the outfalls to another location along the slope would result in greater biological impacts compared to the proposed project. This alternative is rejected and is not reviewed further in this EIR.

Regrading Alternative: Another alternative might be to regrade the project site so that stormwater flows north towards Boquita Drive. This would redirect stormwater, and the need for the existing outfalls would be eliminated. The existing outfalls would still require limited repair and revegetation. This alternative would involve significant earth movement to change the natural flow of stormwater, which is now to the west and south. The regrading would also require the construction of retaining walls along the western and southern edges of the site. This would involve regrading of the entire project site and extensive earthmoving activities, including major construction in the Reserve, compared to the limited grading of the proposed project. The stormwater flows from Boquita Drive to the south through the project site and to an existing 18-inch reinforced concrete pipe (RCP), which proceeds down into the Reserve. If stormwater from the entire site is directed towards Boquita Drive, large stormwater structures would be required onsite and the existing piping from Boquita Drive into the Reserve and to the outfall area in the Reserve would need to be substantially upsized. This would cause extensive reconstruction and disturbance in the Reserve. Therefore, new impacts would result from this alternative, including increased construction noise, visual impacts from the retaining wall and change in ground elevation, air pollution, and inconsistency with the policies of the Local Coastal Program, such as ensuring no increase in peak runoff rate and preserving significant scenic resource areas. Further, this alternative is not necessary because the proposed project would not create a significant biological impact. This alternative is rejected and not addressed further in this EIR.

Stormwater Pumping Alternative: Another alternative might be to eliminate the need for the outflows by pumping the stormwater to Boquita Drive or Mira Montana Drive. The existing outfalls would still require repair and revegetation. Stormwater retention facilities would be required, and pump(s) would be installed to pump stormwater to either Boquita or Mira Montana Drive. However, as with the stormwater from the project site, stormwater from Boquita Drive and Mira Montana Drive also outlets to the Reserve. Boquita Drive flows south toward the project site, and an existing inlet captures stormwater at the school/residential property line and conveys it directly to the Reserve via RCP. Stormwater from Mira Montana Drive flows southerly and drains to the Reserve via RCP. Conveying campus stormwater to Boquita Drive or Mira Montana Drive would interfere with the natural flow of stormwater; it currently flows westerly and southerly and increasing flows to these locations would require expansion of conveyance facilities. Additionally, as indicated above, this would require extensive upsizing in the piping to the Reserve and the outfall, which would cause extensive reconstruction in the Reserve, and therefore, causing severe disturbance in the Reserve. Further, construction and operation of pumps would create noise, consume energy, air pollution, and maintenance issues for the school, therefore resulting in additional environmental impacts. This alternative could also create additional work on Mira Montana Drive. This alternative is not necessary because the proposed project would not create a significant biological impact. This alternative is rejected and is not addressed further in this EIR.

E. ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

The following alternatives were determined to represent a reasonable range of alternatives with the potential to feasibly attain most of the basic objectives of the project but avoid or substantially lessen any of the significant effects of the project.

1. No Project Alternative

Under the No Project Alternative, Del Mar Heights School would not be rebuilt, but minor fixes and updates would occur, including the replacement of the portable buildings, asbestos removal, and technology infrastructure. The students would return to a campus that still needs extensive replacement of plumbing, roofing, and HVAC system, and the stormwater outfall drainages would continue to deteriorate, resulting in further erosion and loss of habitat.

Under this alternative, the short drop-off/pick-up zone (for only about 15 cars) would remain unchanged, and the following conditions from long off-campus traffic queues would continue:

- Parking on both sides of Boquita Drive.
- Illegal parking and abandoned cars in the travel lanes.
- Illegal and hazardous vehicle U-turns.
- Cars blocking residential driveways.
- Constricted access for emergency vehicles, mail and trash truck.
- Bicyclists forced to ride in the middle of the road.
- Students walking in the canyon via Cordero Road to avoid Boquita Drive.

Biological Resources

There are two stormwater outfalls, on southern and western slopes of the campus. These outfalls are not working properly and are causing significant erosion within the sensitive Southern Maritime Chaparral. Stormwater drainage would be treated via three bioretention basins before exiting the outfalls and outfalls would be repaired and revegetated with a mix of native species under the proposed project, and the biological resources impacts, were found to be less than significant under the proposed project. Under the No Project Alternative, no repairs to these outfalls would occur, and erosion would continue to worsen. Therefore, without these improvements to the existing outfalls, this alternative would be environmentally inferior.

Noise

Under this Alternative the campus would remain in its current condition. The demolition of the existing campus and construction of new school buildings would not be required, which would eliminate the construction-related noise impacts. By eliminating the significant noise impact, this alternative would be environmentally superior.

Finding:

Under the No Project Alternative, Del Mar Heights School would not be rebuilt; the students would return to a campus that needs extensive replacement of plumbing, roofing, and HVAC system; and the stormwater outfall drainages would continue to deteriorate, resulting in further erosion and loss of habitat. No changes to the existing drop-off/pick-up zones would occur.

2. Campus Modernization Alternative

Under the Campus Modernization Alternative, the existing buildings would be modernized within the same footprint of the buildings, the portable buildings would be replaced, and the various school utilities and infrastructure (e.g., technology, plumbing, roofing, asbestos removal, and HVAC system) would be upgraded/updated. Site access would remain via Boquita Drive, and the 48-space parking lot and the short drop-off zone (for only about 15 cars) would be resurfaced but remain in place. Therefore, the existing long queues on Boquita Drive and hazardous traffic conditions, as mentioned in Section 7.4.1, above, would continue. Same as the proposed project, students would be relocated to interim schools during modernization. The existing physical education and recreation amenities would remain in place but undergo resurfacing. As with the proposed project, the stormwater outfalls would be repaired and revegetated.

Biological Resources

Under the Campus Modernization Alternative, the needed repairs to the stormwater outfalls would be completed and the slopes revegetated with a mix of native species. As documented in Section 5.1, *Biological Resources*, the proposed improvements to the outfalls would not create a significant biological impact; rather it would repair an existing problem and protect the Reserve from continuing harm.

This alternative is environmentally neutral as compared to the proposed project.

Noise

Modernization of the existing campus would eliminate the need to demolish the existing buildings, regrade the site, and construct new buildings. However, as there would likely need to be extensive saw cutting of the slabs and slab removal to install additional underground utilities and/or structural members to accommodate the modernization, there would still be increased construction noise, but less than under the project. As explained in Section 5.2, *Noise*, the noise impact associated with demolition and grading was found to be less than significant with mitigation. By eliminating these certain construction activities, especially the removal of building foundations, and limiting construction work to modernization of existing buildings and site facilities, the construction noise impact would be reduced.

This alternative would be environmentally superior to the proposed project because it would reduce construction noise, but it is not necessary to eliminate a significant, unavoidable impact.

Finding:

Under this Alternative, the campus would be rebuilt within the same footprint; the building foundations would not be removed. The K-6 school would continue to operate with an administration building, 22 classrooms, and 13 specialty classrooms, play structures, vegetable garden, turf play field, baseball fields, and a 48-space surface parking lot. The parking and drop-off areas would remain in the same area. Under this Alternative, students would be relocated to interim schools in the District during campus modernization, and the capacity of the school would be the same as the existing capacity.

IV. STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires decision makers to balance the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered "acceptable" (State CEQA Guidelines § 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate. Such reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (State CEQA Guidelines § 15093 [b]). The agency's statement is referred to as a Statement of Overriding Considerations.

A. Significant and Unavoidable Impacts

There were no significant and unavoidable adverse impacts identified in the EIR that would result from the implementation of the proposed project. As a result, adoption of a Statement of Overriding Considerations is not necessary.

B. Project Benefits

The proposed project would modernize the Del Mar Heights School campus, and the site would continue to operate as a school serving the surrounding community. The proposed project would:

1. Modernize and renovate the campus to address issues identified in the Facilities Master Plan.

2. Provide a safe and up-to-date campus to enhance and facilitate students' learning environment.

3. Improve circulation and reduce offsite congestion by increasing onsite parking and drop-off/pick-up zones.

4. Provide the general public with updated recreational amenities, including an amphitheater, stand-alone green spaces, and a decomposed granite path.

V. FINDINGS ON RESPONSES TO COMMENTS ON THE FOCUSED DRAFT EIR AND REVISIONS TO THE FOCUSED FINAL EIR

The Focused Final EIR contains response to comments, revisions, clarifications, and corrections to the Focused Draft EIR. The focus of the response to comments is on the disposition of significant environmental issues as raised in the comments, as specified by State CEQA Guidelines Section 15088(b). The District provided written responses to each comment made by a public agency and/or individual, as set forth in Section 2 of the Focused Final EIR, pursuant to State CEQA Guidelines Section 15088(b).

District staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the Focused Draft EIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Focused Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5 of the CEQA Guidelines.

VI. FINDINGS ON ENVIRONMENTAL ISSUES ADDRESSED IN MITIGATED NEGATIVE DECLARATION

The court ruled in Save the Field v. Del Mar Union School District that only three issues required additional review in a Focused EIR. The Board's action to remove the stairs and ADA ramp removed the transportation issue, which left two issues to be addressed in the Focused EIR. Those two issues are addressed above. The section below identifies the issues addressed in the MND, the level of environmental impact, any mitigation measures that were included and the impact level after mitigation is applied. All environmental impacts were either less than significant or mitigated to a less than significant level. Further, the court found these issues adequately addressed.

Aesthetics

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

Less Than Significant Impact. The project site is adjacent to open space canyonlands, to the west of the site, and the Pacific Ocean is 0.80 mile west of the site. The proposed developments onsite would be limited to one story with low slope roofs. The elevation of Mira Montana Drive is approximately 399 feet, and the highest elevation of where the proposed buildings would be located, on the eastern portion of the site, is approximately 387 feet – a difference of 12 feet. As shown in the visual simulations contained in the Initial Study/MND, views from Durango Drive, Mira Montana

Drive, Boquita Drive, and the Mira Montana trail head would be similar to existing conditions, in part, due to the existing landscaping, varying topography and elevations, and the proposed one-story buildings with low sloped roofs. As seen in the entry from the Boquita Drive visual simulation, the existing building to the east would be removed, thereby increasing views of the open space canyonlands and Pacific Ocean.

The view from Mira Montana Drive would not be obstructed upon project implementation due to the higher elevation at Mira Montana Drive and the one-story low-sloped roof of the proposed building. Similarly, as the proposed project would occur mostly within the existing disturbed footprint of the site's fence line, views from Durango Drive of the open space canyonlands and from the Mira Montana trail head of the Pacific Ocean and open space areas would be similar to existing conditions. Therefore, the proposed buildings and reconfiguration of the project site would not have a substantial effect on scenic vistas; impacts would be less than significant.

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

No Impact. The closest designated state scenic highway is State Route 75 (SR-75), over 18 miles southeast of the project site. Due to the distance and intervening structures, project development would not result in impacts to scenic resources within a designated state scenic highway. Therefore, no impact would occur.

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

Less Than Significant Impact. The project site is located in an urbanized portion of the City and is currently developed with an existing school. Surrounding uses include residential uses to the north, east, and south, and open space canyonlands to the west and south. The proposed project would not substantially change the existing character of the site. The proposed project would be compatible with the existing development pattern onsite and the character of the surrounding area. Building materials and colors would complement the existing development on adjacent properties. The proposed buildings would have a standing seam metal roof, composite wood planks, and smooth and textured fiber cement paneling, to reinforce the coastal appearance of the surroundings. Although the visual qualities of the project site during construction would not appear better than the existing condition of the property, the construction worksite would be temporary. The finished project would include landscaping, new buildings with siding, paint, and windows, and the exterior finishes of the proposed buildings would complement and blend in with the design of the surrounding structures and coastal neighborhood. Moreover, the locations of the buildings would result in a campus similar to the existing school and would not significantly change the aesthetic of the site. Therefore, although project implementation would alter the visual appearance of the site, the improvements would not substantially degrade the visual character and quality of the project site and surrounding area. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The exteriors of the proposed buildings would have non-reflective fiber cement paneling. Lighting in the proposed buildings and parking lots would also be similar to existing – motion-detected lighting for security and safety purposes, and interior building lighting. As the lights would be motion-activated, they would be off when these areas are unoccupied; the school is intended to primarily operate between dawn to dusk and does not include significant nighttime lighting. There would be no lighting at the field, which is adjacent to the MHPA. Lighting along the western boundary between the adjacent MHPA/preserve area, if any, would be minimal, directed inward toward the school, and shielded from the preserve.

The lights along the eastern parking lot and passenger loading zone are 20 feet in height. The elevation difference between the site and Mira Montana Drive is 25 feet at the north end and 10 feet at the south end. While the lights would extend above the elevation of Mira Montana by 10 feet at the south end, these lights would have shields focusing light down onto the campus. The differing grades between Mira Montana Drive, vegetated slope on the eastern portion of the site, and landscaping would reduce light and glare impacts. Additionally, light and glare levels caused by the proposed project would not be substantially greater than existing levels. Therefore, light and glare impacts would be less than significant.

Agriculture and Forestry Resources

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

No Impact. The project site has no agricultural or farm use on it, nor is there agricultural or farm use in its immediate proximity. No project-related farmland conversion impact would occur. The project site is fully developed and is not mapped as important farmland by the Division of Land Resource Protection. No impact would occur.

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

No Impact. The zoning designation for the project site is RS-1-3. The proposed project would not conflict with agricultural zoning or a Williamson Act contract as it is not zoned for agricultural use. Williamson Act contracts restrict the use of privately-owned land to agriculture and compatible open space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no Williamson Act contract in effect onsite. No impact would occur.

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

No Impact. Project development would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits" (California PRC § 12220[g]). Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including trees" (California PRC § 4526). The project site is zoned as RS-1-3. No Impact would occur.

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

No Impact. Vegetation onsite is limited to scattered ornamental trees and shrubs. Project construction would not result in the loss or conversion of forest land. Project development would not cause a loss of forest land. No impact would occur.

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

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

Air Quality

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

Less Than Significant Impact. The proposed project involves the redesign and reconstruction of Del Mar Heights School, which is not expected to increase in capacity. Thus, the proposed project would not affect the regional growth projections because the land use is consistent with the City of San Diego's underlying General Plan land use designation and would not require a general plan designation or zoning amendment. Furthermore, the proposed project would also not have the potential to substantially affect housing, employment, and population projections within the San Diego region, which is the basis of the San Diego Regional Air Quality Strategy (RAQS) projections. Therefore, the proposed project would not conflict or obstruct implementation of the RAQS and impacts are less than significant in this regard. No mitigation measures are required.

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

Less Than Significant Impact.

Short-Term Air Quality Impacts

Construction activities are anticipated to occur over an approximately 8.4-acre area. Construction would involve demolition of existing buildings, site preparation, grading, trenching, building

construction, asphalt paving, and architectural coating. Air pollutant emissions from project-related construction activities would not exceed the County's regional emissions thresholds. Therefore, air quality impacts from project-related construction activities would be less than significant.

Short-Term Interim Phase Air Quality Impacts

During construction of the school, approximately 236 students in kindergarten through 3rd grade that would attend Del Mar Heights School would be temporarily relocated to Del Mar Hills Academy, 0.8 miles away. Approximately 203 students from 4th through 6th grade would be temporarily relocated to Ocean Air School, 5.0 miles away. To accommodate these students, four portable classrooms would be added to Del Mar Hills Academy and one would be added to Ocean Air School, which would require minor site preparation and a total of 20 truck trips to install. The installation would result in a nominal increase in emissions that would be substantially less than emissions identified for the reconstruction of Del Mar Heights School. Relocation of these students would also result in a potential increase in VMT. This increase in air pollutant emissions and VMT would be temporary and nominal and would serve the local community by providing close options for school during reconstruction of Del Mar Heights School. Therefore, impacts to the regional air quality associated with the short-term relocation of students would not exceed the City's significance thresholds, and impacts would be less than significant.

Long-Term Operation-Related Impacts

Typical long-term air pollutant emissions generated by a land use would be generated by area sources (e.g., landscape fuel use, aerosols, and architectural coatings), mobile sources from vehicle trips, and energy use (natural gas) associated with the land use. As the proposed project only involves a redesign and reconstruction of the elementary school, it would not result in an increase in student capacity. Furthermore, the proposed buildings would, at minimum, be designed and built to meet current Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen). Thus, these buildings would be substantially more energy efficient than the existing buildings. Thus, operation of the proposed project would not result in an increase in emissions compared to existing conditions and would not exceed the SDAPCD regional significance thresholds. Therefore, impacts to the regional air quality associated with operation of the project would be less than significant.

a) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Localized Impacts
Onsite construction and operation of the proposed project would be substantially below the County's thresholds; and therefore, localized emissions are also less than significant.

CO Hotspots
Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact. The proposed project would not increase exposure at the project site from proximity to the surrounding roadways and freeways. Therefore, no significant impacts would occur, and no mitigation measures are required.

Health Risk
Both the San Diego Air Pollution Control District and the City of San Diego do not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. In addition, construction activities would not exceed the significance thresholds. For the reasons stated above, it is anticipated that construction emissions would not pose a threat to onsite and offsite receptors at or near the school, and project-related construction health impacts would be less than significant, and no mitigation measures are required.

Operation
The proposed project involves construction of new classroom facilities to replace the existing classroom buildings. In addition, it is within a residential community and is not within a quarter mile of any permitted or non-permitted facilities (e.g., warehousing). Furthermore, there are also no freeways or busy corridors within a quarter mile. Therefore, it is not anticipated that the onsite students and staff would be exposed to an actual or potential endangerment from surrounding emissions sources and carcinogenic and non-carcinogenic impacts would be less than significant. No mitigation measures are required.

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

Less Than Significant Impact. The project site would continue to operate as a school. Therefore, the project would not result in a change in land use that would generate odors. During construction activities, construction equipment exhaust, application of asphalt and architectural coatings would temporarily generate odors. However, any construction-related odor emissions would be low in concentration, temporary, and are not expected to affect a substantial number of people. Odors would not be objectionable and constitute a public nuisance. Impacts associated with construction-generated odors would be less than significant and no mitigation measures are required.

Biological Resources

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?

This impact is one of the issues that required additional analysis in the Focused Draft EIR. The findings related to this biological impact are provided in Section III C. The biological issues addressed below were adequately addressed in the MND and not included in the Focused Draft EIR.

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

No Impact. The project site is developed with an existing school. No riparian habitats were observed onsite that would be considered jurisdictional by regulatory agencies. As such, no impacts would occur.

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

No Impact. The project site is currently developed with an existing school. No wetland or drainage areas were observed on the project site that would be considered jurisdictional by regulatory agencies. Therefore, no impacts would occur to wetlands or drainage areas.

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

Less Than Significant Impact. The project site is adjacent to the City of San Diego's Multi-Habitat Planning Area (MHPA); however, all impacts would occur outside of the MHPA, within the existing school limits. Therefore, no permanent or temporary direct impacts to wildlife corridors would occur. Additionally, the project design includes measures specifically intended to avoid impacts to the adjacent MHPA. The ornamental landscaping onsite and the sensitive habitat located to the west and south of the project site have the potential to support nesting bird species. The project would comply with the MBTA bird nesting season restrictions and therefore would not result in impacts to nesting regulatory birds protected by the MBTA. Therefore, impacts would be less than significant.

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

No Impact. The proposed project would occur within the project site boundaries, which is District-owned property. No impact to City trees would result. Therefore, no impacts would occur.

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

No Impact. The project site is located adjacent to the City of San Diego's MHPA. All impacts would occur within the existing footprint of the school site, outside the MHPA. Therefore, no direct impacts would occur.

Cultural Resources

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

No Impact. The project site contains Del Mar School, which is not historically significant. Not impacts to historic resources will occur.

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

Less Than Significant Impact With Mitigation Incorporated. In the event that archeological resources are discovered, a halt-work condition would be implemented, and a qualified archaeologist would be retained to assess such findings. Implementation of Mitigation Measure CUL-1 would reduce impacts to archaeological resources to a less than significant level.

Mitigation Measure

CUL-1 Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Del Mar Union School District (Permittee) shall implement the City of San Diego's Archaeological Monitoring Program and verify that a qualified archaeological monitor and Native American monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological and/or tribal cultural resources as identified on the archaeological monitoring exhibit prepared by the Archaeological Principal Investigator. If archaeological resources are discovered during excavation and/or construction activities, construction shall stop within 25 feet of the find, and the qualified archaeologist shall be consulted to determine whether the resource requires further study. The archaeologist in consultation with the Native American monitor shall make recommendations to the District for the protection, avoidance of, or additional treatment of the discovered resources. Archaeological resources recovered shall be permanently curated with an appropriate local institution in accordance with industry standards, and a final monitoring report prepared and provided to the City of San Diego for review.

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

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

Energy

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

Less Than Significant Impact. Construction contractors are anticipated to minimize non-essential idling of construction equipment during construction in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9 (SCAQMD 2014). Such required practices would limit wasteful and unnecessary energy consumption. Therefore, overall, it is expected that construction energy usage associated with the proposed project would not be any more inefficient, wasteful, or unnecessary than similar projects and impacts would be less than significant with respect to construction-related energy demands.

The project would decrease transportation-related energy by increasing the drop-off zone on-campus and increasing on-campus parking spaces. Making the flow of traffic more efficient would decrease congestion and the excessive idling that now occurs. Therefore, operation of the proposed project is not anticipated to increase the demand for electricity, natural gas, and transportation energy compared to existing conditions and impacts would be less than significant.

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

No Impact. The proposed project would comply with the Building Energy Efficiency Standards and CALGreen. Therefore, implementation of the proposed project would not conflict or obstruct plans for renewable energy and energy efficiency.

Geology and Soils

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

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

Less Than Significant Impact. The project site is not in an Alquist-Priolo Earthquake Fault Zone and no fault traces are depicted on the site and the nearest faults are offshore. Therefore, impacts would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The project site is not on a known fault zone or within an earthquake fault zone. The Rose Canyon Fault is approximately 3 miles to the southwest and the Coronado Bank Fault is approximately 17 miles to the southwest. Therefore, impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is unlikely at the project site. Additionally, all structures would be built to adhere to the 2019 California Building Code (CBC) which provides minimum standards to protect property and public welfare by regulating design and construction to mitigate the effects of adverse soil conditions. Therefore, impacts would be less than significant.

iv) Landslides?

Less Than Significant Impact. The site has a low to moderate risk for landslides; the site is relatively level and is located on a terrace and no landslides have been mapped on the site. Furthermore, all structures on the site would comply with the 2019 CBC which provides minimum standards to protect property and public welfare by regulating design and construction to mitigate the effects of adverse soil conditions.

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

Less Than Significant Impact. The project site would implement structural and nonstructural best management practices before and during construction to control surface runoff and erosion to retain sediment on the project site. Once the proposed project is constructed, soil erosion would be controlled with improvements installed on the project site. Therefore, a less than significant impact would occur.

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

Less Than Significant Impact. Implementation of California Building Code (CBC) and other related construction standards apply seismic requirements and address certain grading activities. The CBC includes common engineering practices requiring special design and construction methods that reduce or eliminate potential expansive soils-related impacts. Compliance with CBC regulations would ensure adequate design and construction of building foundations to resist soil movement. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. All structures built onsite would adhere to the current CBC. Additionally, since the site would be part of a school site, the California Geological Survey and Division of the State Architect would ensure that the buildings are sufficiently mitigated for the condition. Therefore, the project site would not have less than significant impacts on exposing people or the proposed structures to adverse effects associated with expansive soils.

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

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

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

Less Than Significant Impact With Mitigation Incorporated. Due to the ground disturbance associated with construction, there is potential that natural landform beneath the site would be encountered during construction and that subsurface resources and/or paleontological resources would be discovered. Implementation of Mitigation Measure GEO-1 would ensure that if resources are discovered during ground disturbing activities that resources would be recovered in accordance with state and federal requirements. Implementation of Mitigation Measure GEO-1 would reduce impacts to paleontological resources to a less than significant level.

Mitigation Measures

GEO-1 Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Del Mar Union School District (Permittee) shall implement the City of San Diego's Paleontological Monitoring Program as described in Chapter 14, Article 2, Division 1 of the City of San Diego Municipal Code (Section 142.0151) Paleontological Resources Requirements for Grading Activities and the Land Development Manual - Appendix P - General Grading Guidelines For Paleontological Resources. The need for Paleontological monitoring shall be based on the results of a site specific paleontological records search as well as information regarding existing known soil conditions (native or formation) conducted by a qualified paleontologist. If paleontological resources are discovered during excavation and/or construction activities, construction shall stop within 25 feet of the find, and the qualified paleontologist shall determine the appropriate methodology for the salvage and recovery of fossil resources before construction activities can continue in the area. Any paleontological resources recovered shall be permanently curated with an appropriate institution, such as, but not limited to the San Diego Natural History Museum, in accordance with industry standards, and a final monitoring report prepared and provided to the City of San Diego for review.

Greenhouse Gas Emissions

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

Less Than Significant Impact. Because the project involves the redesign and reconstruction of the elementary school with no increase in student capacity, and the project would replace the existing classroom buildings with new, more energy efficient structures, overall operation of the proposed project would not result in an increase in emissions compared to existing conditions. Therefore, GHG emissions generated by the project are considered less than significant and no mitigation measures are required.

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

No Impact. The proposed project would construct replacement school facilities at the existing school and is consistent with the underlying General Plan land use designation. Furthermore, implementation of the proposed project would result in the reduction of up to 48 average daily trips compared to existing conditions. Thus, the proposed project would not interfere with SANDAG's ability to implement the regional strategies outlined in The Regional Plan. The proposed project would not have the potential to interfere with the State of California's or SANDAG's ability to achieve GHG reduction goals and strategies. Therefore, no impact would occur.

Hazards and Hazardous Materials

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

Less Than Significant Impact. Project construction would require small amounts of hazardous materials, including fuels, greases and other lubricants, and coatings such as paint. The handling, use, transport, and disposal of hazardous materials by the construction phase of the project would comply with existing regulations of several agencies–the EPA, Occupational Safety and Health Administration (OSHA), California Division of Occupational Safety and Health (Cal/OSHA), and the US Department of Transportation (DOT). With the exercise of normal safety practices, the project would not create substantial hazards to the public or the environment. Therefore, a less than significant impact would occur.

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

Less Than Significant Impact. According to the Phase I report, soil sampling, which was conducted to assess the presence of residual pesticides and lead, indicated that the residual pesticide and lead in the soil do not pose a human health risk. Therefore, impacts would be less than significant.

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

No Impact. There are no schools located within 0.25-mile of the project site. Furthermore, the project site would operate as an elementary school and would not emit hazardous emissions or handle hazardous materials or substances. Therefore, no impact would occur.

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

Less Than Significant Impact. According to the Phase I report, several databases were utilized to identify if the project was listed on these databases; the project site was listed on HAZNET as the school had materials containing polychlorinated biphenyls (PCBs), 0.17 tons of organic liquid, and 20.22 tons of asbestos containing waste transported off-site for proper disposal under manifest. The project site was not listed on EnviroStor or GeoTracker (DTSC 2019; SWRCB 2015). Therefore, impacts would be less than significant.

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

No Impact. The project site is not within two miles of a public use airport; the McClellan-Palomar Airport is approximately 12 miles to the north in the Carlsbad, CA. Therefore, no impacts would occur.

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

Less Than Significant Impact. The proposed project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project site and surrounding properties during construction and post-construction. The proposed project would improve parking and queuing onsite, thereby reducing congestion on the surrounding roadways, and would provide a 20-foot wide fire access lane around the entire campus. Additionally, both the City Fire Marshal and DSA would be required to approve fire access around the site. As part of the DSA process, a Fire and Life Safety Review would be conducted when DSA would review building construction and how occupants can safely exit the buildings in case of a fire. The proposed project would not result in inadequate emergency access, and impacts would be less than significant.

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

Less Than Significant Impact. The project site is in a very high fire hazard severity zone (VHFHSZ) (CAL FIRE). The proposed fire lane is 20 feet in width throughout its length and it eliminates the existing restricted access point. The fire lane includes hammerhead turnarounds and the hose length distances are in compliance with the 2019 California Fire Code. Further, the plan has been reviewed by the City of San Diego Fire Marshall.

The proposed buildings will all meet current building standards. The new buildings are noncombustible construction with the building envelope (walls, roofs, eaves, and soffits) designed to be ignition-resistant construction and glass will be tempered, per 2019 California Building Code, Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure. The existing portables are of combustible construction.

The proposed project includes four fire hydrants to provide multiple fire defense locations around the campus, while the current campus has only one fire hydrant.

The proposed project would introduce fully sprinkled buildings to the campus. The existing campus are non-sprinkled buildings.

The slopes on the west and south sides (buffer area between the developed school campus and the Reserve) ranges from 2 feet to over 200 feet wide. This buffer area is currently maintained by the school district, in compliance with San Diego Fire-Rescue Department's city-wide Brush Management and Weed Abatement regulations. Additionally, door to door brush inspections, by uniformed Code Compliance Officer with the Fire-Rescue Department's Brush Management, are conducted for properties on canyon rim areas (located within the Wildland Urban Interface). This practice would not change with the proposed project. No additional brush management area would be required for the project. While the plan does not provide the full 100-foot defensible space along the entire perimeter of the site, the Government Code 51182 provides for exemption or variances. In this case, the District desires to be good stewards of the environment and avoid all intrusions into the Reserve. The numerous safety features justify the current design and the District has received pre-approval by the City of San Diego Fire Marshall. While the school site remains in a Very High Fire Hazard Severity

Zone, the proposed plan addresses these issues, improves upon the level of fire safety over the existing campus.

Hydrology and Water Quality

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

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

For site operations, structural BMPs, including swales and landscape planters, would reduce runoff. Therefore, a less than significant impact to water quality standards would occur. The proposed project would also be required to comply with applicable federal, state, and local regulations. Provided that the standard BMPs are implemented, the proposed project would not substantially degrade water quality. A less than significant impact would occur.

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

Less Than Significant Impact. The proposed project does not propose groundwater wells that would extract groundwater from an aquifer, nor would the proposed project affect recharge capabilities for the basin, as there are no wetlands onsite. Therefore, a less than significant would occur.

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

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

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

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

Less Than Significant Impact. The proposed project would not alter the course of a stream. Project implementation would increase impervious surfaces on site, however, the use of BMPs

and compliance with local, state, and federal regulations would ensure that drainage patterns and stormwater runoff are maintained. Therefore, a less than significant impact would occur.

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

Less Than Significant Impact. Project implementation would increase impervious surfaces onsite, however, the proposed BMPs would reduce impacts associated with impervious surfaces. The proposed project would be required to comply with local, state, and federal regulations pertaining to stormwater. Therefore, the proposed project would not exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The project site is developed with an existing school. The proposed project would take place within the footprint of the project site, which is within Zone X, Area of Minimal Flood Hazards (Flood Insurance Rate Map ID #06073C1328G and #06073C1309G)) (FEMA 2012). Since the likelihood of floods in the project area is low, the proposed project would have a less than significant impact on impeding or redirecting flood flows.

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

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

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

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

Land Use and Planning

a) Physically divide an established community?

No Impact. The project site is surrounded by residential uses and open space canyonlands. The proposed project consists of rebuilding school buildings within the fence line of the project site boundaries and would not divide an established community. Therefore, no impact would occur.

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

Less Than Significant Impact. The project site is currently zoned RS-1-3 and the existing land use designation is Institutional and Public and Semi-Public Facilities. Implementation of the proposed project would not change the zoning or land use designations of the site. The proposed project would not change the uses on site, and impacts would be less than significant.

Mineral Resources

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

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

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

No Impact. The City of San Diego Conservation Element indicates that extraction of mineral resources occurs in Mission Valley, and other areas such as Carroll Canyon and Mission Gorge, as well as within the Multiple Species Conservation Program subarea plan (San Diego 2008b). The project site currently operates as a school and no mining activities occur onsite. Therefore, the proposed project would not result in a loss of availability of a mining site, and no impact would occur.

Noise

c) 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?

Construction noise is one of the issues that required additional analysis in the Focused Draft EIR. The findings related to construction noise are provided in Section III C. The issues addressed below are limited to operational noise, which were adequately addressed in the MND.

Less Than Significant Impact.

Operational Noise – Traffic

The proposed project would not result in staff or student population increases. The proposed project would reduce the number of classrooms from 22 existing to 21 proposed. Currently, the school has one parking lot and entrance on the north via Boquita Drive. The proposed project would expand the parking lot and add a drop-off/pick-up lane along the east and southeast portion of the school. The new drop-off/pick-up lane would be parallel to Mira Montana Drive and would range approximately between 10 feet to 25 feet below Mira Montana Drive. The elevation range, of 10 feet to 25 feet, of the slope would act as a noise barrier to car idling and other vehicle related noises by obstructing line-

of-sight to residences on Mira Montana Drive. The new drop-off/pick-up lane would deter vehicles from using Mira Montana as a drop off area. Traffic noise would not significantly increase above existing conditions and impacts would be less than significant.

Operational Noise – Mechanical Equipment

The construction of new buildings would have mechanical HVAC systems. HVAC equipment would be new, and it is anticipated that the associated noise would be similar to existing HVAC equipment or quieter. For reference, typical HVAC noise is 72 dBA at 3 feet and the nearest sensitive receptors are residences approximately 150 feet to the east and north of proposed buildings. At that distance, HVAC noise levels would attenuate to 38 dBA or less. This would not exceed the municipal code exterior noise limits for single-family residences at any time of day or night. This impact would be less than significant.

Operational Noise – Recreation

These additions, reconfigurations, and eliminations could change the existing noise environment during outdoor student recreation activities. The new outdoor learning area on the northwest corner would not cause a significant noise increase or change in use from its existing kindergarten playground. The outdoor learning area would not have nighttime lighting and use would be limited to daylight hours. The southeast portion of the multi-use field that includes two ball fields and batting cages located on the south and southeast corner of the school would be eliminated and replaced by new educational buildings reducing recreational noise at nearby residences to the south and east off Mira Montana Drive. The multi-use field adjacent to Torrey Pines Extension would be reconfigured, causing no substantial change to the associated recreational noise. The proposed project's outdoor learning area and playfields plan would not result in a substantial noise increase from existing conditions and would, instead, result in a potential noise decrease in certain areas. Therefore, recreational noise would be less than significant.

Noise and Land Use Compatibility

The proposed project land use would not change and would remain a school use surrounded by residential uses and open space. The project would not generate new or additional trips. The land use compatibility of the noise environment at the proposed project site would remain acceptable.

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

No Impact. The proposed project is not located within the Airport Environs Overlay Zone (AEOZ) of the San Diego International Airport. The McClellan-Palomar Airport is approximately 12 miles to the north in the Carlsbad, CA and the nearest private and or military air strip is Miramar MCAS (Joe Foss Field) Airport, approximately 7 miles to the southeast. The project would not expose people working in the project area to excessive aircraft noise levels. There would be no impact.

Population and Housing

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

No Impact. The proposed project would not increase the capacity of Del Mar Heights School, however, the number of classrooms onsite would decrease by one. Therefore, the proposed project would not directly increase population growth in the area. No construction of homes or businesses is proposed, not extension of roads or other infrastructure. Project implementation would not induce population growth and not impact would occur.

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

No Impact. Project construction would be restricted to the existing Del Mar Heights School campus, and no housing would be displaced or replaced. No impact would occur.

Public Service

a) Fire protection?

Less Than Significant Impact. Although the proposed project would increase building square footage by approximately 18,000 square feet, the student capacity of the proposed project would remain unchanged, and the site would continue to operate as a school. Additionally, the improvement of the onsite parking and queuing would remove congestion in the adjacent neighborhood, and the addition of fire lanes around the site would thereby improve emergency vehicle access. Therefore, project implementation would not substantially affect the Department's response times or require expansion of fire protection services such that new or physically altered fire stations would be required. Impacts would be less than significant.

b) Police protection?

Less Than Significant Impact. Although the proposed project would increase building square footage by approximately 18,000 square feet, the student capacity of the proposed project would remain unchanged, and the site would continue to operate as a school. Furthermore, the improved parking onsite and queuing would remove congestion in the adjacent neighborhood, thereby reducing response times to the site. Therefore, project implementation would not warrant additional law enforcement facilities. Impacts to police protection services would be less than significant.

c) Schools?

No Impact. School service needs are related to the size of a residential population, geographic area served, and community characteristics. The proposed project would address the most critical physical needs of buildings and grounds at the campus through the rebuilding and reconfiguration of buildings onsite. Once constructed, the new school facilities would continue to serve the existing Del Mar Heights School program and students in the District attendance area. No negative impact on school facilities or services would occur.

d) Parks?

Less than Significant Impact. The proposed project would not generate a demand for park space, which is typically caused by population and/or employment growth. The proposed project would improve the Del Mar Heights School's recreational facilities that are available for community use. The proposed project would provide amenities that are not now available in the community, such an outdoor learning space in the northwest portion of the site, an open grass amphitheater area for larger group gatherings, a Canyon Rim path and sidewalk which would create a walking loop around the site, stair and ramp access to the trail head at the southern portion of the site which serves as a workout opportunity, and a smaller grass field area at the northwestern portion of the site for mid-sized games. Although the square footage of useable recreation space would decrease by 41,643 square feet, the enhanced recreational facilities and the increased use by students and the community would compensate for the reduction. The District recently completed a new baseball field for Little League Junior/Senior Baseball use. No significant impact would occur. Additionally, the reconfiguration of the site would improve student safety by separating public and school uses.

e) Other public facilities?

No Impact. The need for public services and facilities (e.g. libraries, hospitals, childcare, teen or senior centers) is typically caused by an existing school, it would not result in the need for new or expanded public facilities. No impact would occur to public facilities.

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?

Less Than Significant Impact. Similar to existing conditions, operation of Del Mar Heights School would not require students to use existing neighborhood or regional parks. The proposed project would enhance and update the school's outdoor recreational spaces. While the ballfield used by the older little league teams (90-base paths) would be eliminated, the new flat grass field includes space for two smaller fields used by younger baseball teams and the District recently completed a new baseball field for Little League Junior/Senior Baseball use. The activity level would be similar on the new fields as the existing, but a shift in use among age groups would occur. The field is also available for soccer play.

Additionally, an outdoor learning area would be created onsite, which would be used by both the school and the community. The student capacity would remain unchanged after project implementation and impacts to offsite recreational facilities as a result of the proposed project would not result in negative impacts.

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. The proposed project would not require construction of offsite recreational facilities. The proposed project includes the rebuilding and enhancing of recreational facilities at Del Mar Heights School. The environmental effects related to the whole project, including

the recreational facility improvements and additions, are discussed throughout this Initial Study. Impacts would be less than significant.

Transportation

The potential traffic impact associated with the stairs and ADA ramp is one of three issues requiring additional review. The finding for this impact is provided in Section III C. The following transportation issues were adequately addressed in the MND and not reviewed in the Focused Draft EIR.

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

Less Than Significant Impact. The proposed project would not increase the student capacity at Del Mar Heights School. Therefore, there would be no additional traffic as a result of the project. Additionally, there would be no change in traffic patterns as the entrance to the extended student loading zone would remain via Boquita Drive.

Pedestrian access to the project site would be via the existing sidewalks and internal walkways that would connect to the new student loading zone. Under the proposed project, the existing access driveway would remain the same and no closure to public sidewalk would be required.

There is no bicycle lane or facility along Boquita Drive and there are none within proximity of the project site. The closest bicycle lane is on Del Mar Heights Road. Project implementation would remain within the current fence line of the project site. Therefore, no impact to bicycle facilities are anticipated.

The closest bus stop for this route is approximately 0.6 mile west of the project site at the South Camino Del Mar and Del Mar Heights Road intersection. The project would not displace any existing or future bus stop or degrade transit service in the area.

Therefore, the proposed project would not result in a conflict with a program, plan, ordinance or policy addressing the alternate mode of transportation facilities. Impacts would be less than significant, and no mitigation measures are necessary.

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

No Impact. The project would not result in additional student capacity and number of staff, and therefore would not result in increased trips. In addition, the project would improve the flow of traffic within and near the campus, reduce congestion and vehicle idling, and create a safer environment for students to walk and bike to school.

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

No Impact. The proposed project would create a drop-off and pick-up zone centrally located at the eastern parking lot, and a turnaround at the southeastern portion of the site and extend the student loading zone from the entrance of the driveway to the southeastern portion of the site, which would reduce queues on streets. By increasing efficiency and flow for vehicles to enter and exit the school property, congestion on adjacent streets would be reduced, thereby creating a safer environment for students to walk and/or bike to campus.

Tribal Cultural Resources

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

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

No Impact. The project site contains Del Mar Heights School; the project site is not identified as a state or national historic resource. Construction of the proposed project would be within the footprint of the project site's fence line. Therefore, there would be no impacts to historical resources.

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

Less Than Significant Impact with Mitigation Incorporated. The Torrey Pines Community Plan identifies the Sorrento Valley/Los Peñasquitos Lagoon area as the site of the prehistoric Indian Village of Ystagua, which has archaeological remnants unique to the area. The project site is not located in the Sensitive Coastal Resource (SCR) zone or area subject to the Resource Protection Ordinance. Moreover, the project site is fully developed with no visible native ground surface exposed. Implementation of CUL-1 would ensure that if resources are discovered during ground disturbing activities that resources would be recovered in accordance with state and federal requirements. Implementation of Mitigation Measure CUL-1 would reduce impacts to archaeological resources to a less than significant level.

Utilities and Service Systems

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

Less Than Significant Impact. The proposed project involves the redesign and reconstruction of Del Mar Heights School, which is not expected to increase in capacity. The proposed project would remove all existing utilities onsite and provide new utilities from the existing points of connection to the proposed buildings. Therefore, as utilities would not be expanded or relocated, impacts would be less than significant.

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

Less Than Significant Impact. As student capacity at the school would remain unchanged, the water needs of the school are expected to be similar to existing conditions; therefore, the City's water supply is anticipated to be sufficient for the proposed project and impacts would be less than significant.

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

Less Than Significant Impact. The proposed project would not increase capacity at the school; therefore, it is anticipated that the wastewater facilities would continue to have adequate capacity to serve the proposed project. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The proposed improvements would not result in an increase in the student or staff populations, and therefore, generation of waste during operational activities would be similar to existing conditions. Project impacts on landfill capacity would be less than significant.

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

Less Than Significant Impact. Solid waste would be generated during construction and operation of the proposed project. The proposed project would comply with all applicable local, state, and federal statutes and regulations related to solid waste disposal. Therefore, impacts would be less than significant.

Wildfire

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

Less Than Significant Impact. The proposed project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project site and surrounding properties during construction and post-construction. The proposed project would improve parking and queuing onsite, thereby reducing congestion on the surrounding roadways, and would provide a 20-foot wide fire access lane around the entire campus. Additionally, both the City Fire Marshal and DSA would be required to approve fire access around the site. As part of the DSA process, a Fire and Life Safety Review would be conducted when DSA would review building construction and how occupants can safely exit the buildings in case of a fire. The proposed project would not result in inadequate emergency access, and impacts would be less than significant.

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

Less Than Significant Impact. The project site is in a very high fire hazard severity zone (VHFHSZ) (CAL FIRE). The proposed fire lane is 20 feet in width throughout its length and it eliminates the existing restricted access point. The fire lane includes hammerhead turnarounds and the hose length distances are in compliance with the 2019 California Fire Code. Further, the plan has been reviewed by the City of San Diego Fire Marshall.

The proposed buildings will all meet current building standards. The new buildings are noncombustible construction with the building envelope (walls, roofs, eaves, and soffits) designed to be ignition-resistant construction and glass will be tempered, per 2019 California Building Code, Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure. The existing portables are of combustible construction.

The proposed project includes four fire hydrants to provide multiple fire defense locations around the campus, while the current campus has only one fire hydrant.

The proposed project would introduce fully sprinkled buildings to the campus. The existing campus are non-sprinkled buildings.

The slopes on the west and south sides (buffer area between the developed school campus and the Reserve) ranges from 2 feet to over 200 feet wide. This buffer area is currently maintained by the school district, in compliance with San Diego Fire-Rescue Department's city-wide Brush Management and Weed Abatement regulations. Additionally, door to door brush inspections, by uniformed Code Compliance Officer with the Fire-Rescue Department's Brush Management, are conducted for properties on canyon rim areas (located within the Wildland Urban Interface). This practice would not change with the proposed project. No additional brush management area would be required for the project. While the plan does not provide the full 100-foot defensible space along the entire perimeter of the site, the Government Code 51182 provides for exemption or variances. In this case, the District desires to be good stewards of the environment and avoid all intrusions into the Reserve. The numerous safety features justify the current design and the District has received pre-approval by the City of San Diego Fire Marshall. While the school site remains in a Very High Fire Hazard Severity Zone, the proposed plan addresses these issues, improves upon the level of fire safety over the existing campus.

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

Less Than Significant Impact. Due to the reconfiguration of buildings onsite, the proposed project would require changes to the connections to utilities such as electricity, water, and sewer. The utilities would be installed to meet service requirements. The construction of infrastructure improvements for the project would not directly increase fire risk, and impacts would be less than significant.

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

Less Than Significant Impact. The project site is relatively flat. The project site is located in an area that is generally susceptible to landslides. Additionally, the project site is located within Flood Zone X – Area of Minimal Flood Hazard (Flood Insurance Rate Map ID #06073C1328G and #06073C1309G) (FEMA 2012). Construction activities related to the proposed project would be subject to compliance with the California Building Code (CBC) and would include best management practices (BMPs). Therefore, with implementation of BMPs and compliance with the CBC, impacts would be less than significant.